

# Privacy Policy

This Privacy Statement (the “Statement” or “Policy”) explains the privacy practices of Grow Media Group. (“Grow Media Group”, “we”, “us”, “our”) with respect to our collection, use, storage and disclosure of personally identifiable information about our Members, Prospective Members, Marketing Partners, Sales Partners, Users, and Web Site Visitors (“Personal Information”) and other information we gather in connection with your use of the websites, mobile applications, services, products, promotions, email, beacon technology, and software applications owned, managed or provided to you by us or on behalf of us by third parties (“Services”).

BY USING THE GROW MEDIA GROUP SERVICE, YOU AGREE TO OUR COLLECTION, USE, AND DISCLOSURE OF YOUR PERSONAL INFORMATION AND OTHER INFORMATION WE GATHER IN ACCORDANCE WITH THIS PRIVACY STATEMENT. IF YOU DO NOT AGREE WITH THIS STATEMENT, DISCONTINUE ALL USE OF THE GROW MEDIA GROUP SERVICE IMMEDIATELY.

## **1. Our Commitment to Privacy**

We are committed to protecting and respecting your privacy. This Privacy Statement provides you with details regarding: (1) why we collect personal information; (2) what we do with that information; (3) the steps that we take to ensure that access to that information is secure; (4) how you can access personal information pertaining to you; and (5) who you should contact if you have questions and concerns about our policies or practices.

Since we regularly review our policies and practices, your comments are always welcome. We reserve the right to change this Privacy Statement at any time. Please check back from time to time so you are aware of any changes or updates to the Policy. We will alert you that changes have been made by indicating at the top of the Privacy Statement the date that it was last updated. If you continue to access or use the Services after the changes are effective, you agree to be bound by the revised Policy.

## **2. What is Personal Information?**

Personal information means information that would identify a specific individual or information that can be directly associated with an individual.

Personal information does not include aggregate information from which individual identities have been removed.

### **3. Information We Collect**

We will collect both Personal Information and other information when you voluntarily provide it or use the Services. In connection with your use of the Services, we may collect and store information that you submit through the Services, as well as information about your use of and activities on the Services. This Policy does not apply to any unsolicited information that you provide, including, but not limited to, information posted to any public areas of the Service and any unsolicited submissions. All unsolicited information is non-confidential and we are free to reproduce, disclose and distribute it without limitation or attribution.

The Personal Information we collect may include, but is not limited to:

- Account and profile information such as name, email address, age, gender, location, and interests and other preferences
- Activity information on how you use the Services, such as offers viewed, saved, or redeemed, searches, connections to third party services such as Facebook or other social networks, the pages you visit from within the Services, the dates and times of your access to the services
- Location information provided from your web browser or mobile device while accessing the Services to facilitate recommendations and redemption of offers. You may decline to provide location information at any time using your web browser settings or mobile device's system settings. However you may be unable to use the Services if location information is disabled.
- Device and connection information such as device type and capabilities, referring URLs and sources, IP address, and Internet connection or mobile carrier information.
- Transaction data such as venue, offer, time and date, and location when you use or redeem offers or other parts of the Services.

### **4. How We Use The Information We Collect**

We use the information to process your requests, verify your eligibility to use the Services or a specific promotion or offer, provide you with the functionality of the Services, and to understand your needs and usage behaviour so that we can serve you better. Generally, we need to use your personal information for the following purposes:

- To confirm your membership status, past usage, and current location in order for you to receive certain promotions, offers, rewards, and other services that only members can enjoy;
- To understand our customers' needs and preferences, in order to tailor the service for individual customers, through both automated and manual processes;
- To correspond with us and to assist our front-line staff in providing tailored sales, support, or customer service;
- To comply with applicable regulations and laws;
- To meet regulatory or contractual requirements relating to the services and products provided to you;
- To improve the quality of the Service, and to generally manage our business.

### **5. When We Share The Information We Collect**

As outlined above, from time to time we engage unaffiliated third parties ("Suppliers") that provide services to help us with our business activities. These may include service and data hosting and monitoring and maintenance, payment processing, business analytics, application development, customer service and communications, or other services relating to the day-to-day operations of the Services. These third parties may have access to, or process Personal Information as part of providing those services. We limit the information provided to these services to that which is reasonably necessary for them to render their services to us and/or our members.

We share aggregated and anonymous usage data (such as age range, gender, view and redemption data, and other automatically collected information that does not personally identify you) with third parties. These third parties may include marketing services or agencies, ad services, data exchanges, compliance obligations, or other businesses interested in acquiring demographic information, as well as the retailers and suppliers that currently, or may in the future, offer promotions, advertisements, or other services through the Services. Some Services may be co-branded and offered in conjunction with another company. If you register for or use such services, both Grow Media Group and the other company may receive information collected in conjunction with the co-branded services.

We will disclose personal information if a law, regulation, search warrant, subpoena or court order legally authorizes us or requires us to do so.

The Services provide the opportunity to share directly to popular social networking services, and may contain external links to unaffiliated third party

websites. Personal Information you share on these platforms or with these websites is subject to that third party's terms and privacy policy.

## **6. How long do we hold personal information?**

Personal information is retained only for so long as is necessary for the purpose set out above. When no longer required, we will destroy, erase, aggregate, or de-personalize the information. Legal requirements may necessitate our retaining some or all of the personal information we hold for a period of time that is longer than we might otherwise hold it.

## **7. Cookies, Pixels, and Tracking**

We and our Suppliers may use cookies, pixel tags, log files, local shared objects, and other technologies to collect certain information about your interactions with the Services. These technologies make the Services more useful by storing information about your preferences and helping to identify you for various purposes. It may be possible to disable some cookies and similar technologies through settings on your device or browser. This opt-out will apply only to the device or browser you are using when you elect to opt-out. If you opt-out of any of these technologies, the Services may not be able to function as expected.

Please note we do not change system behaviour in response to Do-Not-Track signals from your web browser.

## **8. Accuracy**

To ensure that the personal information you provided is accurate, complete and up to date, we urge you to provide us with updates regarding such information and to inform us of any errors affecting the personal information that we hold.

## **9. Security**

We utilizes industry standard methods to protect the Personal Information submitted to us. We will continue to keep in place security measures in an effort to protect the Personal Information held by us from unauthorized use, access, modification, disclosure, distribution, loss, or disposal. Access to Personal Information will be restricted to our authorized personnel who require the information in order to perform their duties properly. In addition, access will be limited to only that information that is strictly necessary for the performance of those duties.

## **10. International Data Transfer**

Our third party service providers may be based outside of Canada so their processing of your Personal Information will involve transferring data outside of Canada.

We will only transfer your data to countries that provide an adequate level of protection for personal data, and we will only use service providers that have adequate data protection and privacy policies in place.

Please note that privacy laws in such jurisdictions differ from Canadian privacy laws and that in some jurisdictions your Personal Information may be accessed by law enforcement authorities or the courts.

### **11. Links to Other Web Sites**

The Services may contain links to unaffiliated third party web sites. Except as discussed in this Policy, we do not share your Personal Information with them. We neither control nor endorse external sites and we are not responsible for the content of such sites or the Personal Information you share directly with them.

The Service may provide the opportunity for you to share your activities via social media services like Facebook and Twitter. The Personal Information you share on those platforms will be governed by the terms of use and privacy policy of the respective services.

### **12. Children**

The Services are not intended for children or youth under the age of majority. We have no intention of collecting Personal Information from children or youth who are under the age of majority. If you are under the age of majority, you are prohibited from using the Services as per our terms and conditions. Further, please do not provide Personal Information to us of any kind whatsoever. If a child provides us with Personal Information, a parent or guardian of that child may contact us to have this information deleted from our records.

### **13. Complaint Process**

If you are not completely satisfied with or wish to submit comments concerning this Privacy Statement or its application by us, we invite you to convey your concerns or suggestions to: Grow Media Group Marketing Ltd., 1-126 Main Street North, Dauphin, Manitoba, Canada R7N 1C2 Attention: Privacy Officer. We will reply as quickly as possible and inform you of the

steps, if any, that has been or will be taken in order to address the concern or implement the suggestion.

**Effective Date:** February 1st, 2020