# ThinkRad Studios Inc. Right2Vote Project Privacy Policy

Right2Vote is a project wholly owned and operated by ThinkRad Studios Inc. ("ThinkRad"). Right2Vote is non-partisan and is not affiliated with Elections Canada or any political party.

ThinkRad is committed to fair information practices in the course of its Right2Vote project. This privacy policy and agreement outlines the principles and guidelines by which ThinkRad operates to protect the personal information of Right2Vote website users in accordance with the *Personal Information Protection and Electronic Documents Act* ("<u>PIPEDA</u>").

Please read this privacy policy carefully to fully understand how we collect, share and protect your personal information.

### What is Personal Information?

Personal information is any information about an identifiable individual. Personal information includes any information that can be used to identify or contact you.

ThinkRad is responsible for all personal information under its control and has designated an individual accountable for ThinkRad's compliance with PIPEDA, although other individuals within ThinkRad may be responsible for the day-to-day collection and processing of personal information.

### **What Personal Information We Collect**

ThinkRad only collects personal information which you voluntarily disclose on the Right2Vote website.

ThinkRad collects information about how users interact with the Right2Vote website. This data may include items such as your country location, IP address, browser or device.

### Why We Collect Personal Information

ThinkRad collects personal information where it is necessary to provide services to the users of Right2Vote. Your personal information will be collected, used and disclosed only for the legitimate purposes identified and for which consent has been obtained.

Information about how you interact with the Right2Vote website will be aggregated and used to assess the effectiveness of the service and improve the Right2Vote website features.

## **Disclosure of Personal Information**

ThinkRad limits the disclosure of personal information to that which is necessary for the fulfillment of the purpose for which it was collected, except with the consent of the individual or as required by law. ThinkRad does not, and will not, sell or commercially distribute your personal information without your consent.

ThinkRad may use third party organizations or individuals to help us operate the Right2Vote site. We may share your information with these third parties only as necessary to perform the specific services, provided that you have given your consent. We will make reasonable efforts,

whether by contractual or other means, to protect the personal information that is being provided to the third party.

# **Future Changes in How We Use or Disclose Personal Information**

If ThinkRad proposes to use or disclose personal information for a purpose not previously identified, the new purpose will be identified prior to its new use. Unless the new purpose is required or permitted by law, your consent is required before the information can be used or disclosed for that purpose.

### **How We Safeguard Personal Information**

ThinkRad protects your personal information with security safeguards appropriate to the sensitivity of the information. ThinkRad will use best efforts to prevent against loss or theft, as well as unauthorized access, disclosure, coping, use, or modification of Right2Vote participants personal information.

Nonetheless, transmission of information on the Internet is never completely secure. Therefore, we cannot guarantee the security of data sent to us electronically. The transmission of any data is entirely at the users own risk.

#### Access to Your Personal information

On written request in the manner provided below, and subject to exemptions provided by law, ThinkRad will inform a Right2Vote participant of the existence, use and disclosure of their personal information and will provide access to that information. An individual is entitled to challenge the accuracy and completeness of the information and have it amended as appropriate.

## **Changes to this Privacy Policy**

Industry standards relating to personal information are subject to continual development. As a result, this means that from time to time, ThinkRad may make changes to their privacy policy.

ThinkRad will notify Right2Vote participants by email of any significant changes that require your consent to new use, collection or disclosure of your personal information. ThinkRad will not notify users of non-significant changes, however you may review this privacy policy at any time.

## **Comments, Questions and Complaints**

Should you have any comments, questions or complaints with respect to this privacy policy, please contact ThinkRad at:

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