

1416607 Canada Inc. dba Telco Rewards (“Telco Rewards” or “we”) makes available shopping programs through [www.telcorewards.ca](http://www.telcorewards.ca) and related mobile and software applications (“Services”). This Privacy Policy describes how we collect, use, share, and protect information in connection with the websites, mobile websites, mobile applications, browser applications, and any other Services that refer or link to this Privacy Policy.

## **1. Collection of Information**

We collect, process, and use your information when you:

- Register for our Services or sign into an existing account
- Visit our website(s)
- Access our application(s)
- Connect to our Services using third-party accounts, such as your email, social media, or payment account(s)
- Contact us for support
- Participate in our shopping programs
- Purchase products through our Services
- Enter a sweepstakes, contest, promotion, survey, or poll

Further, we and our service providers automatically collect certain information about you through:

- Interaction with our Services
- Cookies and other tracking technologies
- Monitoring and analyzing trends, usage, and activities

The types of information you provide may include Personal Information. “Personal Information” means information that can be used to identify you (whether alone or in combination). The Personal Information you may provide to us includes:

- First and last name
- Email address
- Mailing, billing, and/or shipping address
- The product or service requested or purchased
- How you connect to our Services, such as your IP address, unique device identifiers, device or session IDs, and information regarding the network and connected hardware (e.g., computer or mobile device)
- Browsing, shopping, and purchase history
- Click-stream data (the page-by-page paths you take as you browse through our Services)

By signing into the Service through a third-party social networking service (“Social Networking Service”), such as Facebook or Google, you give us permission to access, store and use any information that you permit the Social Networking Service to share with us in accordance with the privacy settings applicable to your account with that Social Networking Service.

## **2. Use of Information We Collect**

#### Manage Your Account

If you provide us Personal Information, we may use it to: (i) process your registration with our Services, including verifying whether your email address is active and valid and enrolling you into our programs; (ii) facilitate and manage your purchase transactions; (iii) track your shopping, deliver you rewards or payments, and identify opportunities for rewards and/or offers; (iv) send you technical notices, updates, security alerts, and administrative messages; (v) provide you member services regarding your account and reply to your questions, comments and requests; and (vi) comply with legal and regulatory provisions in force and with the competent judicial authorities in each geographical jurisdiction that the Telco Rewards operates in. We may also use your information to assess security risk and prevent fraud.

#### Improve Services

We may process information through analyzing and monitoring usages and trends and performing statistical analyses to improve our Services and the websites, applications, marketing efforts, and the products and services of our affiliates to provide a better service to you in the future. We may also use this information to adapt Service content to be more likely to be of interest to you.

#### Provide Marketing Information

Telco Rewards may use information to provide you more personalized offers and/or special offers, discounts, and similar information. If you elect to receive marketing communications, Telco Rewards may send you newsletters, rewards, discounts, promotion codes, events, and general information about the service if you consent. To match your profile and interest, we may use your information to create a profile of your preferences and provide you content and features. We may use your information to provide you advertisements.

#### Administer Contests, Sweepstakes, and Promotions

From time to time, Telco Rewards may invite you to enter various contests, sweepstakes, surveys, or promotions. If you choose to participate in a contest or promotion, your Personal Information may be used to administer the contest, such as to determine your eligibility for the contest or to award a prize.

### **3. Sharing of Information**

#### Service Providers and Business Partners

We may share Personal Information with third-party service providers (which may include Telco Rewards affiliates) to operate our Services. Our third-party service providers (including Telco Rewards affiliates) may be located in the United States. We may share your Personal Information with our service providers that provide member support, process payments, and perform other business operations on our behalf, under our instructions and in compliance with appropriate technical and organizational security measures to protect your data. For example, we may partner with other companies to provide you support services, authentication services, prevent fraud on our Services,

administer our promotions, referral programs, sweepstakes, and surveys, perform analytics, maintain the accuracy of our databases, facilitate your travel reservations, fulfill your product purchases, and administer your rewards or payments. We will not sell your Personal Information or your payment information, but we may rent, sell, and share other information that cannot be used to identify you with merchant partners, third parties, or affiliates.

#### Protection of Rights and Other Legal Purposes

We may share the information we collect, including Personal Information, to the extent permitted by applicable law, (i) in response to subpoenas or other legal process or if in our good faith opinion such disclosure is required or permitted by law; (ii) at the request of governmental authorities conducting an investigation; (iii) to defend our terms and conditions or other policies applicable to our Services; and (iv) to protect the rights, property, life, health, security and safety of Telco Rewards or any third-party.

#### Business Transfers

We may share the information we collect, including Personal Information, with any third-party in connection with, or during negotiations of, any proposed or actual merger, purchase, sale (including a liquidation, realization, foreclosure, or repossession), or any other type of acquisition of all or any portion of Telco Rewards assets, conveyance or transfer of all or a portion of our business to another company.

### **4. Your Choices**

You may in some cases have the option to decline providing us information. However, your choice to not provide information may impact your use of certain features or services. You may unsubscribe or opt out of receiving marketing communications from us by using the unsubscribe link on the footer of our marketing emails, by logging into your account and updating your settings, or by using the Contact Us option through the Services. Upon request, we will provide you with information whether we hold any of your Personal Information. You may request that we delete any personal information we have collected from you or maintain about you by using the Contact Us option through the Services. If you request that we delete your personal information, we will do so except to the extent we determine that we need the information for a business purpose and have a legal right to maintain it, in which case we will inform you of that legal exception. We encourage you to maintain the accuracy of the information you submit to us, such as the information you provide us to register for your account. The Services may allow you to access, review, correct, update, and remove or make inaccessible Personal Information you have provided through your account settings. With respect to linked email accounts, you may unlink your email account from your Service account by updating or switching off the connection in your account settings within the Service. You may provide account updates and changes by logging into your account and changing settings or by using the Contact Us option through the Services. With respect to our mobile and other applications, you can prospectively stop all collection of information by the application by uninstalling the application. You may at any time opt out from further allowing us to have access to your location data by adjusting the permissions in your mobile device. We will make good-faith

efforts to make requested changes in our then-active databases as soon as reasonably practicable.

## **5. Retention**

We may retain information about you for as long as it is necessary to fulfill the purposes described herein. Some of your information may be retained in our systems even after you request your information to be deleted in order to comply with our obligations under applicable law, collect fees owed, resolve disputes, enforce our legal rights, otherwise use internally in a lawful manner that is reasonably aligned with the expectations of the consumer or compatible with the context in which the information was provided, and to undertake any investigations necessitated by the foregoing.

## **6. Data Security**

We have implemented technical and organizational measures to provide a level of security appropriate to the risk to the Personal Information that we process. These measures are aimed at preserving the ongoing integrity and protecting the confidentiality of users' Personal Information. We evaluate these measures on a regular basis to confirm that they continue to maintain and apply an appropriate level of security

## **7. Electronic Communications**

By signing up for an account, you may receive periodic emails from Telco Rewards. If you consented to receiving promotional email communications, you can opt out of receiving such communications from us at any time by (i) following the instructions provided in those communications; (ii) modifying your Email Preferences in the Account Settings of your account; or (iii) contacting us through the Services. Please note that even if you opt out of receiving promotional communications, we may continue to send you non-promotional emails and other types of communications, as permitted by law, such as service emails relating to our ongoing business relationship. Service emails contain service-related announcements that affect your account, such as product order confirmations, reward or payment updates, and responses to your comments and feedback submitted to us. Telco Rewards mobile applications, browser extensions, and websites may send you notifications, such as alerts, sounds, and icon badges. Push notifications or in-app messages may include both operational messages and promotional messages regarding products, services, and offers that may be of interest to you. When using mobile applications, push notifications and other mobile alerts can be configured in the settings of your mobile device. As with emails, even if you opt out of receiving promotional communications, we may continue to send you non-promotional push notifications, such as those about your use of the applications or our ongoing business relations.

## **8. Cookie Policy**

We and our partners use cookies and similar technologies to analyze trends, administer the website, track users' movements around the website, and gather demographic information about our user base. We use cookies for many purposes, including, without limitation, authentication, tracking user preferences or web pages visited while using our Services. You may control the use of cookies at the browser level. If you choose to disable cookies, it may limit your use of certain features or functions on the Service.

## **9. Analytics, Targeting, Tracking**

We, and third parties with which we partner, may also use cookies, pixels, and other technologies to automatically collect information about your use of the Services, such as your click-stream data, browsing history, IP address, web browser, pages viewed, time spent on pages, links clicked, and conversion information. Data collected from a browser or device may be used with another computer or device that is linked to the browser or device on which such data was collected (also known as cross-linking). We may also work with third parties to serve ads to you as part of a customized campaign on other websites or platforms. These third parties may also collect Personal Information about your online activities over time and across different websites when you use our Services to help predict your preferences and to display (and to enable other third parties to display) ads to be more likely to be of interest to you. Some third-party service providers that we engage (including third-party advertisers) may also place their own cookies on your browser. If you wish to opt-out of interest-based advertising, [click here](#). Note that this Privacy Policy covers only our use of cookies and does not include use of cookies by such third parties.

## **10. Third-Party Websites**

The Services contain hyperlinks to websites of merchants and retailers and other websites or locations that we do not control and are operated and controlled by third parties ("Third-Party Websites"). Our Privacy Policy does not apply to these Third-Party Websites and we make no representations regarding the policies or business practices of any such Third-Party Websites. We encourage you to review, and if necessary, adjust, your privacy settings on the applicable Third Party Websites.

## **11. Referral Programs**

Telco Rewards may offer features which allow you to inform an individual about our Services. If you choose to use our referral features, we will ask you for your referral's email address to send them an electronic communication inviting them to join our Services. You may also import contacts from your Google or other email account address book to invite them to become members of our website. We collect the username and password for the email account from which you wish to import your contacts and will only use your personal information for that purpose. Telco Rewards will store this information for the sole purpose of sending this email and tracking the success of our referral program. If you choose to participate in our referral programs, you represent and warrant that you have a personal relationship with your referral and that you are authorized to

share their information with Telco Rewards for the purpose of sending this communication to invite them to join the Services.

If you believe that one of your contacts has provided us with your Personal Information and you would like to request that it be removed from our database, please contact us at [admin@telcorewards.ca](mailto:admin@telcorewards.ca)