

## PRIVACY POLICY

This Privacy Policy was last modified on **September 28, 2020**.

Super Save Group, and their respective affiliates and associated entities (collectively “**Super Save**”, “**we**”, “**our**”, “**us**”) recognizes the importance of your right to privacy and wants you to be familiar with how we collect, use and disclose any personal information that individually identifies you and our commitment to meet our obligations under applicable Canadian privacy laws.

This Privacy Policy (“**Privacy Policy**”) explains how we collect, use, disclose and protect your personal information when you use our website [www.supersave.ca](http://www.supersave.ca), any sub-domains provided by Super Save, and any related mobile site (collectively the “**Site**”), during our intake process, during our contractual relationship with you, and while providing our services (the “**Services**”) to you. It also explains how you can contact us if you have questions about how we handle your information. We will only collect, use and disclose your personal information in accordance with this Privacy Policy.

By using our Services and supplying your personal information, you acknowledge that you have read and understood this Privacy Policy, and you agree and consent to the collection, use, disclosure and other processing of your personal information as outlined in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use our or Services or supply your personal information to us.

### **1. What Personal Information do we collect?**

Personal information means any information about an identifiable individual. Anonymous data means data that is not associated with or linked to any individual’s personal information or will not easily permit the identification of individuals (“**Anonymous Data**”). We do not consider personal information to include Anonymous Data.

We collect your personal information about you when you provide it to us or use our or Site or Services. We may also collect information about you from certain third parties in order for us to be able to provide and facilitate the Services to you. In most instances, you will decide what information you provide us. In certain instances, if you choose not to provide us with personal information, you may not be able to fully utilize our or Services. The types of personal information that we may collect include, but is not limited to:

- General contact and bio information such as your name, phone number, e-mail address, and home address
- Payment information when you pay for services
- IP address
- Employment information (if you are submitting a credit application) such as you occupation, position, title, and salary

In the event you make a payment to us directly, we shall process your payment through our internal accounts receivable department and keep your payment information on file if you ask us to. In the event you make a payment to us online, we do not control, process, or store any of your payment information. We use a third-party payment processor to manage all of the payments that take place through us, and any such purchases are facilitated through this third-party. Any payment transactions will be encrypted using a certified technology that the third-party processor has elected to use as part of their system.

## **2. Purposes for Collecting Your Personal Information**

We collect, use and disclose your personal information in order to provide you with our Services. We also collect, use and disclose your personal information to comply with legal and regulatory requirements and as otherwise may be permitted or required by applicable laws. We will only use the personal information that we collect for the purposes for which it was collected. We collect your personal information for the following purposes and in accordance with applicable laws:

- To present our Site and its contents to you;
- To provide you with our Services;
- To facilitate our contractual agreements;
- To facilitate payments;
- To provide ease of access of information between group members if you require multiple Services from us;
- To provide you with information, products, or Services that you request from us;
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it;
- To improve our Site, Services, marketing (in accordance with applicable laws), or customer relationships and experiences;
- To verify and confirm your identity;
- To establish and maintain commercial relations with you, including responding to your questions regarding our Services;
- To respond to questions that you send by email, through our Site, or via telephone;
- To customize the appearance of the Site displayed to you;
- To meet any legal or regulatory requirements.

## **3. When Do We Collect Personal Information?**

We may collect your personal information when you voluntarily provide it to us, by coming to a contractual agreement with us, and/or when using our Services. For example, we may ask you to provide personal information if you:

- Use our Site or Services;
- Correspond with us by email or phone;
- Otherwise participate in features of our Site and our Services that ask for or require your personal information.

#### **4. Limiting Collection of Personal Information**

We limit the collection of personal information to only the information that is necessary to fulfill the purposes identified in this Privacy Policy and to provide you with the Services. We will collect, use, and disclose your personal information only in accordance with this Privacy Policy.

#### **5. Consent, Use Disclosure and Retention of Personal Information**

Depending on the sensitivity of the personal information, your consent to our collection, use and disclosure of personal information may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction.

Your personal information will not be used without your consent for purposes other than those for which it was collected and to facilitate our Services, or in accordance with applicable laws. From time to time, we may wish to use personal information for new or additional purposes, in which case we will amend the Privacy Policy to include these new or additional purposes and will obtain your consent through your continued use of our Site or Services. If we make any material changes to how we use your personal information, we will notify you by email to the primary email address that you have provided us, and we may also post a notice on the Site home page.

We may generate Anonymous Data from personal information collected through the Site and Services by removing information that makes the data personally identifiable to an individual. Such Anonymous Data includes, but is not limited to, information we collect from your use of our Services. We may use this Anonymous Data and aggregated data for any reasonable purpose subject to applicable laws. We do not disclose this data to third parties.

We retain your personal information only for as long as we need it to fulfill the purposes for which it was collected and to comply with our legal obligations.

We may also use and disclose your personal information to service providers, data processors and other third parties ("**Third Parties**") under the following limited circumstances:

- To Third Parties that assist with our operations and facilitating our Site and Services including, without limitation, for customer services, our business operations, monitoring and analyzing Site activity, operating and maintaining the Site, or providing you with multiple Services. Such Third Parties may only use your personal information for the purposes described in this Privacy Policy.
- When necessary to protect (i) our safety, property or other rights; (ii) our representatives, customers and users of the Site and stakeholders; (iii) to conduct investigations of possible breaches of law, including, including to detect and prevent fraud;
- To identify, contract or bring legal action against someone who may be violating an agreement that they have with us;

- To investigate breaches of security safeguards or cooperate with government or regulatory authorities pursuant to a legal matter;
- On the sale of our business where personal information may be provided to third parties in connection with a prospective or completed business transaction, including a sale or merger (including transfers made as part of bankruptcy proceedings or insolvency) involving all or a part of Super Save or as a part of a corporate reorganization or stock sale or additional or other changes in corporate control;
- With your consent; or
- As otherwise required or permitted by law.

We may also, from time to time, as part of our due diligence process, collect personal information about you from telephone calls, application forms or contracts, face-to-face meetings, emails or other forms of communication, past dealings you may have had with us, credit reporting agencies, current or previous lenders or bankers or mutually known parties such as brokers or intermediaries. This allows us, and any credit bureau, service provider, person or organization to whom we may disclose your personal information, to verify your identity, understand your needs, assess your creditworthiness and financial status, take a security interest, obtain automatic bank withdrawals, comply with tax, regulatory, contractual and other legal requirements, and if required, to assist with enforcement and collection of the loan.

If we sell, merge or amalgamate some or all of our business with other entities, we may release the personal information we hold about you to the prospective investor, purchaser or assignee as part of the due diligence process, and when the transaction is completed.

## **6. Data Transfers**

Your personal information may be collected, used, processed, transferred, and retained in multiple countries including Canada and the United States which may be outside the region in which you are situated and may have different privacy or data protection legislation, and may therefore be subject to the laws of these countries. Additionally and as discussed above, we may also engage Third Parties to perform certain services on our behalf and to otherwise provide the Services. These Third Parties may store, process and transfer personal information on servers located outside of Canada in jurisdictions whose data protection laws may differ from those of Canada, such as the United States of America. As a result, personal information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to the laws in those jurisdictions. For example, information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries. Subject to applicable laws in such other jurisdictions, we will use reasonable efforts to ensure that appropriate protections are in place to require our Third Parties to maintain protections on personal information that are equivalent to those that apply in Canada.

## **7. Links to Other Sites**

Our Site may contain links to other sites that are independently owned and operated by third parties. These other sites may have their own privacy policies and are not governed by this Privacy Policy. We are not responsible for the privacy practices or the content of any sites owned and operated by any third parties. Other sites may collect and treat information collected differently, so we encourage you to carefully read and review the privacy policy of each site you visit.

Any personal information posted, used or disclosed on a third party site or social media page (Facebook, LinkedIn, Twitter, Instagram, or the like) or other social networking page or site is subject to that website's privacy policy, and is not subject to this Privacy Policy.

## **8. Cookies, Web Beacons and Other Similar Technology**

As you interact with this Site and Services, we may use automatic data collection technology and services that record and collect information that identifies your computer, tracks your use of this Site and Services and collects certain other information about you and your surfing habits. These data collection technology and services allows us to store and manage user preferences, enable content, deliver targeted advertising and collect usage data and analytics to ensure the smooth functioning of our Site on your computer or device. These data collection technology may include cookies, web beacons and other similar devices on this Site and Services to enhance functionality and navigation for our visitors. Cookies and other tracking technologies are commonly used by websites and apps through which information is collected about your online activities.

A cookie is a small data file that is placed on your computer or other electronic device so that your device will "remember" information when you visit a site.

Web beacons and tags are small strings of code that are used in conjunction with a cookie and allow us to record activity on our Site. Internet tags, graphic tags and similar web beacon type functions allow us to count the number of users who have visited a particular web page or to access certain cookies.

We may use web beacons on this Site to count users and to recognize users by accessing our cookies. Being able to access our cookies allows us to personalize this Site and improve your experience at our Site. We may also include web beacons in HTML-formatted e-mail messages that we send to determine which e-mail messages were opened. Information tracked through these mechanisms includes, but is not limited to: (i) your IP address; (ii) the type of web browser and operating system being used; (iii) the pages of the Site a user visits; and (iv) other sites a user visited before visiting our Site. Web beacons may also be used to deliver interest-based advertising to you.

You can set your internet browser up so that you are notified when cookies are stored, you can decide in each individual case whether you want to accept cookies, or you can refuse to accept any cookies. However, if you do not accept cookies, you may be restricted in how you are able to use our Site. You can delete cookies that are already stored on your hard disk at any time. You will find more details on how to do this in the operating guide for your Internet browser program.

## **9. Third Party Analytics**

Our Site may use third party analytics services such as Google Analytics and Google Ad-Words, web analytics service of Google. Google Analytics uses cookies to analyze how you use our Site. The information generated by the cookie about your use of our Site (including your IP address) is sent to a Google server in the U.S. and stored there. Google will use this information to evaluate your use of our Site, compile reports on Site activity for our Site operators and to provide other site activity related internet services. Additionally, Google may transfer this information to a third-party when required by law or in the case of a third party processing information on Google's behalf. In no case will Google use your IP address in connection with any other information held by Google. You can set your internet browser to prohibit the installation of cookies, although we must point out that some features and functions of our Site will then be unusable. By using our Site, you consent to the processing of data about you collected by Google in the manner described and for the above-mentioned purpose. The consent for collection and storage of data can be withdrawn at any time in the future by clicking on the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. Given the debate concerning the use of analytical tools using full IP addresses, we wish to point out that our Site uses the "Anonymize IP" function of Google Analytics that works with a shortened form of IP addresses to avoid direct personal identification.

## **10. How We Protect Your Information**

We maintain reasonable technical, physical and organizational security safeguards to protect your personal information against loss, theft, and unauthorized access. Any personal information that you provide to us is exchanged on a secured server. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we are committed to protecting your personal information, we cannot ensure or warrant the security of any information you provide to us.

We take reasonable steps to verify your identity before granting you access to your information, however, you are solely responsible for maintaining the secrecy of your username, password and any other information. We also take reasonable steps to ensure that our employees are aware of the importance of maintaining the confidentiality of personal information and that unauthorized persons do not gain access to personal information that we have disposed of or destroyed.

## **11. Children Under 13**

We do not knowingly solicit, collect, or store any personally identifiable information from anyone under the age of 13. Children under the age of 13 are not allowed to create an account or otherwise use the Site or Services. In the event we learn that we collected personal information from a child under the age of 13, we will delete that information as quickly as possible. If parents or guardians believe that we have unintentionally collected their children's personal information, they may request the deletion of the information by contacting us at [legal@supersave.ca](mailto:legal@supersave.ca).

## **12. Individual Access and Accuracy of Personal Information**

You may request access to your personal information which we may hold by contacting us at the contact information set forth below, and we will respond within the time periods provided for under applicable laws. We will need to verify your identity before providing you with the personal information we hold about you. There is no cost for such access request unless you require copies of records. We may not be able to provide you with access to your personal information if the information cannot be separated from the personal information of others, cannot be disclosed for reasons of security or commercial confidentiality, or is protected by legal privilege. If we cannot provide you with access to your personal information, we will advise you of the reasons access is being denied, unless we are prohibited by law from doing so.

You may request to update and change your personal information at the contact information set forth below. We will endeavor to correct or complete any personal information which you advise us is inaccurate or incomplete. Where appropriate, the amended information will be transmitted to third parties having access to such information.

## **13. Electronic Communications**

When you use our Site or contract with Super Save to receive Services, or otherwise sign-up to receive information regarding our developments or related products and services, we collect your contact information such as your name, phone number, mailing addresses and email address. If you opt in to receiving our communications, we will use this information to send you communications based on your expressed interests by mail or email.

You will always have the opportunity to unsubscribe from receiving any of our e-mail or other communications at any time by contacting us at 604-533-4423 or by email at [it@supersave.ca](mailto:it@supersave.ca) and we will ensure that our e-mails include instructions on how to unsubscribe if you no longer wish to receive future e-mails from us. We provide an on-going opportunity to unsubscribe or opt-out of contact by us as described in the footer of all emails, or at 604-533-4423.

If you decide to unsubscribe, we will only contact you (i) for the purposes allowed under applicable law; (ii) to send you notices of changes to our Privacy Policy; or (iii) to receive Service related messages.

## **14. Changes to this Privacy Policy**

We reserve the right to change or replace this Privacy Policy at our sole discretion at any time. Please check back from time to time to ensure that you are aware of any updates or changes in this Privacy Policy. We will post the most current version on our Site and we will indicate at the top of this page the date this Privacy Policy was last revised. Your continued access or use of this Site or our Services after any such changes constitutes your acceptance of the Privacy Policy as revised. If we make any material changes to this Privacy Policy, we will notify you by email to the primary email address that you have provided us and we may also post a notice on the Site home page.

## **15. Your Consent to the Terms of this Privacy Policy**

By using our Site and/or Services and providing us with your personal information, you agree that Super Save may collect your personal information and you voluntarily consent to the collection, use, disclosure and transfer of your personal information in accordance with this Privacy Policy. If you do not agree with any terms of this Privacy Policy, please do not use our Site or our Services or provide us with any personal information. If you do not understand the nature, purpose and consequences of us collecting, using and disclosing your personal information, please do not use our Site or our Services or provide us with any personal information, and contact us at the contact information set forth below so that we can address your questions or concerns.

Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the purposes identified in this Privacy Policy at any time by contacting the email or telephone number below and providing reasonable prior written notice. If you refuse or withdraw your consent, you acknowledge that we may not be able to provide you or continue to provide you with certain services or information that may be of value to you. However, you may not be permitted to withdraw your consent to certain necessary collections, uses and disclosures of your personal information (for example, if Super Save needs to maintain reasonable business and transaction records).

## **16. How to Contact Us**

We welcome your feedback. If you have questions, comments or concerns about this Privacy Policy, or would like to do any of the following:

- See your personal information that you have already sent us so that you can correct, update or delete it from our files;
- Ask that we not send you electronic communications or otherwise contact you; or
- Report any violation of this Privacy Policy

Please contact us via email at [info@supersave.ca](mailto:info@supersave.ca) and we will endeavour to get back to you within a reasonable time.