



# The Campbell River Collection App Privacy Policy

We are strongly committed to letting you know how we will collect and use your Personal Information (as defined below). The policies below are applicable to Personal Information collected through the use of the Destination Campbell River Collection Apps (“App”). We have established this privacy policy (“**Privacy Policy**”) to let you know the kinds of personal information we may gather during your use of this App, why we gather your information, what we use your Personal Information for, when we might disclose your Personal Information, and how you can manage your Personal Information.

By using our App, you are accepting the practices described in our Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the App. We reserve the right to modify or amend the terms of our Privacy Policy from time to time without notice. Your continued use of our App following the posting of changes to these terms will mean you accept those changes. If we intend to apply the modifications or amendments to this Privacy Policy retroactively or to personal information already in our possession, we will provide you with notice of the modifications or amendments.

If you have any questions about this Privacy Policy or don't see your concerns addressed here, you should contact us by email at [campbellriver@destinationthink.com](mailto:campbellriver@destinationthink.com).

## What Information About Me Is Collected and Stored?

We collect two basic types of information from you in conjunction with your use of the App, personal information and non-personal information. “**Personal Information**” means any information related to an identifiable individual or that may be used to identify an individual. Personal Information may include information that you may supply to us, as described more fully below, i.e., when register on the App and use the features. It can also include information that we collect automatically through your use of the App.

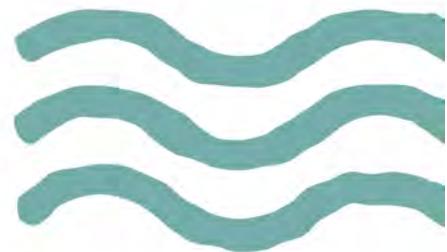
Non-personal information includes information that does not personally identify you, including any information that has been aggregated or anonymized such that it does not identify a specific individual.

### **Personal Information**

As a general matter, you can browse the App without submitting your Personal Information to us. However, there are a number of circumstances in which you may supply us or our agents with your

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Personal Information. The following lists the most common ways in which we may collect your personal information.

- Registration for an account on the App
- Uploading Content to the App
- Participation in surveys
- Sign up to receive alerts or other information via email, text or instant message from Destination Campbell River
- App related communications, e.g. account verification; technical notification
- Submission of content or other data and information on any part of the App that permits it

### ***Account Information***

In order to use the App, end user may be required to have a valid account (“**Account**”). When you register for an Account, Destination Campbell River collects certain Personal Information from you, namely, your first name, email address, and password (collectively, “**Account Information**”).

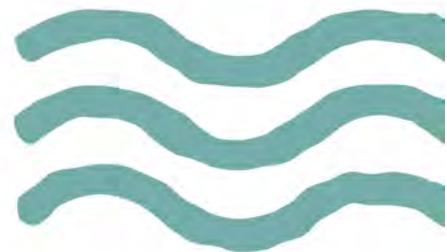
### ***Device Information***

When you use the App, we automatically collect certain information about your device:

- Device information about your browser, mobile device, or other device that you use to access the App. This information may include IP address, geolocation information, unique device identifiers, browser type, browser language, and other transactional information.
- Analytics and usage information about your use of the App.
- Additional “traffic data” and log files such as time of access, date of access, software crash reports, session identification number, access times, and referring website addresses.
- Other information regarding your use of the App.

### ***Location Information***

In order to enable certain App functionality, including collection and redemption of points within the App, Destination Campbell River may collect your location information based on location of the device. We will not collect any location information that you do not volunteer or enable. We will delete any location information that you request is deleted.



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## How Do We Use Your Information?

We use the information we learn from you to help us personalize and continually improve your experience on the App. We may use your Personal Information in the following ways:

### **General Uses**

- To use the wayfinding features of the App, including collecting points based on locations visited
- To permit you to update, edit, and manage your content on our App
- To communicate with you about your account or transactions with us (including service related announcements) and send you information about features and enhancements on our App
- To communicate with you about changes to our policies
- To personalize content and experiences on our App, including providing you reports, recommendations and feedback based on your preferences
- To optimize or improve our products, services and operations
- To automatically update the App on your device
- To detect, investigate, and prevent activities that may violate our policies or be illegal
- To perform statistical, demographic, and marketing analyses of users of the App

## Who Do We Provide Your Information To?

Except as disclosed in this Privacy Policy, we do not disclose your Personal Information to any companies not part of Destination Campbell River or its parent, subsidiaries or related entities. In no event will we sell or rent your Personal Information as part of a customer list or similar transaction.

### **Business Partners and Third Parties**

We may from time to time employ third parties to perform tasks on our behalf and we may need to share Account Information and other Personal Information with them to provide certain services. Unless we tell you differently, such third parties do not have any right to use the Personal Information we share with them beyond what is necessary for them to provide the tasks and services on our behalf.

### **Business Transfers**

If our business (or substantially all of our assets) are acquired by a third party, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information may be made available or otherwise transferred to the new controlling entity, where permitted under applicable law.

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### ***Third-Party Agents***

We have third party agents, subsidiaries, affiliates and partners that perform functions on our behalf, such as hosting, billing, push notifications, storage, bandwidth, content management tools, analytics, customer service, fraud protection, etc. These entities have access to the Personal Information needed to perform their functions and are contractually obligated to maintain the confidentiality and security of that Personal Information. They are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services to the App.

### ***Emergency Situations***

We may also use or disclose Personal Information if required to do so by law or in the good-faith belief that such action is necessary to (a) conform to applicable law or comply with legal process served on us or the App; (b) protect and defend our rights or property, the App or our users, and (c) act under emergency circumstances to protect the personal safety of us, our affiliates, agents, or the users of the App or the public. This includes exchanging information with other companies and organizations for fraud protection.

### **What Steps Are Taken To Keep Personal Information Secure?**

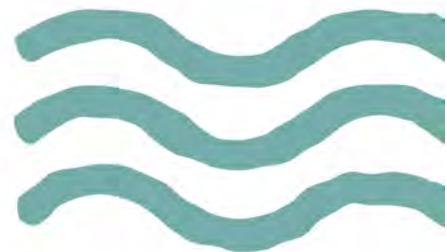
We are concerned about ensuring the security of your Personal Information. We exercise great care in providing secure transmission of your information from your device to our servers. Personal Information collected by our App are stored in secure operating environments that are not available to the public. Our security procedures mean that we may occasionally request proof of identity before we disclose your Personal Information to you. Please understand, however, that while we try our best to safeguard your Personal Information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure.

### **How Can We Transfer Your Personal Information?**

Destination Campbell River processes and stores its data, including Personal Information, on servers located in Canada and the United States. By submitting Personal Information or otherwise using the Services, you agree to this transfer, storing or processing of your Personal Information in Canada and United States. You acknowledge and agree that your Personal Information may be accessible to law enforcement and governmental agencies in Canada and the United States under lawful access regimes or court order.

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## How Long Do We Keep Your Information?

We store your Personal Information for as long as it's needed for the purposes for which we collected it. Following termination or deactivation of your account, Destination Campbell River, or its service providers may retain information (including your profile information) and user Content for a commercially reasonable time for backup, archival, and/or audit purposes. If you have any questions about termination or deactivation of your account, please contact us directly at [campbellriver@destinationthink.com](mailto:campbellriver@destinationthink.com).

## California Privacy Rights

This section provides additional details about the Personal Information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act (the CCPA).

For more details about the Personal Information Destination Campbell River has collected over the last 12 months, please see the section "Information you provide us" above. We collect this Personal Information for commercial purposes described above. Destination Campbell River does not sell (as that term is defined in the CCPA) the Personal Information we collect.

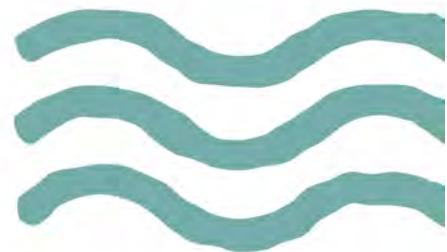
Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of Personal Information we collect (including how we use and disclose this Personal Information), to delete their Personal Information, to opt out of any "sales" of Personal Information that may be occurring, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at the contact information below. We will verify your request using the information associated with your account, if available, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

## European Economic Area Resident Privacy Rights

Destination Campbell River processes Personal Data where the processing is necessary for the performance of a contract with our end users, where the individual data subject has provided consent and otherwise where the processing is necessary for the purposes of the legitimate interests pursued by us.

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Destination Campbell River aims to take reasonable steps to allow you to correct, amend, delete, or



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limit the use of your Personal Information (known as “**Personal Data**” under the EU General Data Protection Regulation). You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us using the contact information set out below. Note that where we act as the data processor on behalf of our Partners, you will be required to contact the data controller directly to exercise your rights.

Please note that we may ask you to verify your identity before responding to such requests.

### **Changes to This Policy**

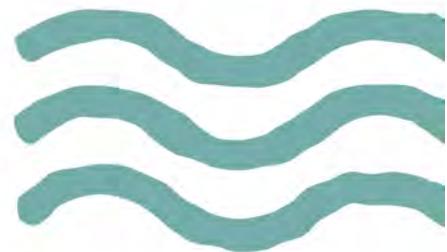
As our App continues to develop, we may add new services and features to our App. In the event that these additions affect our Privacy Policy, this document will be updated appropriately. We will post those changes prominently so that you will always know what information we gather, how we might use that information and whether we will disclose it to anyone. We do, however, recommend that you read this Privacy Policy each time you use our App in case you missed our notice of changes to the Privacy Policy. We will not, however, materially change our policies and practices to make them less protective of Personal Information we have previously collected from you without your express consent.

### **Opt-Out Provisions**

Visitors to our App can choose not to provide the Personal Information needed to register for an Account, however, those visitors will not be able to use the App features. You may choose not to share your precise geo-location information with us by adjusting the device’s location services settings or the settings on our mobile applications.

### **Accessing and Correcting Your Information**

You have the right to access the Personal Information we hold about you in order to verify the Personal Information we have collected in respect of you and to have a general account of our uses of that Personal Information. Upon receipt of your written request, we will provide you with a copy of your Personal Information although in certain limited circumstances, we may not be able to make all relevant Personal Information available to you such as where that information also pertains to another individual or as otherwise required or permitted by law. In such circumstances We will provide reasons for the



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denial to you upon request. We will endeavour to deal with all requests for access and modifications in a timely manner.

If you have an Account, you may review and change your Personal Information by logging into your account and editing your profile. Be advised that we may not be able to delete your Personal Information without also deleting your user account. You will not be permitted to examine the Personal Information of any other person or entity and may be required to provide us with Personal Information to verify your identity prior to accessing any records containing information about you. We may not accommodate a request to change or delete Personal Information if we believe doing so would violate any law or legal requirement, or cause the information to be incorrect.

## Contact

If you would like to access or update your Personal Information, or if you have any questions, concerns, comments or suggestions, about this Privacy Policy, you should contact us by email at [campbellriver@destinationthink.com](mailto:campbellriver@destinationthink.com).

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