

PRIVACY POLICY

Sea Otter Cycling Canada Inc. and our subsidiaries (“we,” “us” or “Sea Otter Canada”) is Canada’s Largest Cycling Festival. We care about protecting the personal information of our customers and visitors who use our websites, products or services (collectively, our “Users”). This privacy policy provides details about how your personal information is collected, shared and used by us. To learn more about Sea Otter Canada, visit: <https://www.seaottercanada.com>. If you have any questions about this privacy policy or the practices described herein, you may contact info @ seaottercanada.com (NOTE SPACES BETWEEN @) or 544 King Street West, Toronto, ON M5V 1M3.

INFORMATION COVERED BY THIS PRIVACY POLICY

This Privacy Policy covers personal information, including any information we collect, use and share from you, as described further below. This Privacy Policy applies to all websites, our products and services, and any mobile applications (collectively, the “Services”). This Privacy Policy does not cover how our Users may use or share data that they collect using our services.

When you purchase a Service from us, your personal information will be collected, used, and shared consistent with the provisions of this Privacy Policy.

INFORMATION WE COLLECT FROM YOU

In the course of your use of the Services, we obtain the following information about you as described below. We collect this data for the purposes described under “How We Use Your Information”.

Signing Up for Services; User Information

- Information you provide prior to any registration process, such as your email when you provide it to us;
- Information that you provide during any registration process, including in connection with a co-branded offer (such as your name, company name, email address, phone number, billing address or credit card information, geographic location and industry), when you call or email us (for support or otherwise) or when you use our products or services; and
- Payment information that you provide to us (by way of our Services or otherwise) when you purchase some of our products and services, including credit card data.

Use of Services, Website Visits and Support

- Data relating to your online activity on our websites with respect to our Services, including the following:
 - IP address
 - browser type and version
 - geographic location
 - pages you view
 - how you got to our Services and any links you click on to leave our Services
 - when you update your information, communicate with us, or order new Services
 - metadata about your use and your contacts' use of our Services and your emails you send (including clicks and opens)
 - your interactions with any videos we offer
 - issues you encounter requiring our support or assistance
 - any device or other method of communication you use to interact with the Services

We store this data we collect in a variety of places within our infrastructure, including system log files, back end databases and analytics systems.

SOCIAL MEDIA

- Information from third party social networking sites, including information that social networking sites provide to us if you use your credentials at such social networking sites to log into some of our Services (such as your name and email address to pre-populate our sign-up form).
- The information you allow us to access varies by social networking site, and depends on the level of privacy settings you have in place at the social networking site. You can

control and find out more about these privacy settings at the applicable social networking site.

OTHER SOURCES

- Information you provide to us in surveys;
- Information that is publicly available; and
- Information you consent to us receiving from third parties.

HOW WE USE YOUR INFORMATION

We use the information we collect, both on its own and combined with any other information we collect about you, for the following purposes:

- To provide the requested Services to you;
- To provide you with useful content;
- To ensure the proper functioning of our Services
- To offer and improve our Services;
- To provide you with requested information or technical support
- To facilitate your movement through our websites or your use of our Services;
- To do a better job of advertising and marketing our Services (our use of your information to do this is performed with your consent where required by applicable law);
- To advertise and market third party products and services (such advertisement is only performed with your permission where your consent is required by applicable law)
- To diagnose problems with our servers or our Services;
- In connection with our security and compliance programs;
- To administer our websites;
- To communicate with you;

- To target prospective customers with our products or services (such targeting is only performed with your permission where your consent is required by applicable law);
- To assist us in offering you a personalized experience or otherwise tailor our Services to you; and
- As otherwise described in this privacy policy.

We also use the information we receive in aggregated and anonymized formats to produce reports on trends and statistics, such as mobile search trends, email open rates by industry, campaign best practices or the number of users that have been exposed to, or clicked on, our websites or evaluated or purchased our products and services.

Payment information that you provide to us, including credit card data, will only be used to facilitate payment for our products and services.

SHARING OF INFORMATION

We will not disclose personal information without your consent to do so. Sea Otter Canada may share the information we receive from you in limited circumstances. Examples include;

- Sea Otter Canada may disclose personal information to investigate, prevent, or take action about actual or suspected illegal activities, violations of Sea Otter Canada terms and conditions, rules and regulations or as otherwise required by law.
- We will transfer information about you if Sea Otter Canada is acquired by or merged with another company. In this event, Sea Otter Canada will notify you by email or by putting a notice on the Sea Otter Canada web site before information about you is transferred and becomes subject to a different privacy policy.
- We will also disclose information if we are required to under a law enforcement investigation or in response to a subpoena, in which case we will try and limit disclosure while complying with our legal obligations.
- Sharing your personal information with trusted third parties including:
 - Our advertising, marketing and promotional agencies to help us deliver and analyze the effectiveness of our campaigns, events and promotions
 - Third parties who wish to send you information about their products and services, but only if you have given us consent to do so

If we do share your personal information with a third party, we shall use our best efforts to ensure that they keep your information secure, take all reasonable steps to protect it from misuse and only use it in a manner consistent with this Privacy Policy.

SECURITY

The transmission of information via the internet, email or text message is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted through the Services or over email; any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organizational measures to safeguard your personal information against loss, theft and unauthorized use, access or modification.

When we collect financial account information, such as credit card numbers, we protect its transmission through the use of encryption such as the Transport Layer Security (TLS) protocol. We encrypt the transmission of personal information using secure socket layer technology (SSL) and industry best practices.

TRACKING TECHNOLOGIES, ONLINE ADVERTISING, METRICS & ANALYTICS

We use cookies, web beacons, pixels, tags, scripts and other similar technologies in the course of our business.

We may use a service from Google called Google Analytics (GA) or similar services from other service providers, which permit us to reach people who have visited our site previously, and display to them relevant advertisements when they visit other sites across the Internet that belong to the Google Display Network. This is called 'remarketing'.

Cookies can be used to track your session on our or another website and serve customized advertising from Google and different third party vendors. When you visit a website you may look at advertisements posted on that site by Google or other third parties. Through first-party and third-party cookies, the third parties may collect information about you while you are visiting the website and other websites and use this data to show you advertisements on this website and across the Internet based on your sites visited on the Internet. For this activity, we do not collect this information or control the content of the advertisements that you will see; it is controlled by third parties such as Google.

OPTING OUT / MANAGING YOUR PERSONAL INFORMATION

You always have the opportunity to opt out of our marketing communications with you or change your preferences by following a link in the footer of all non-transactional email messages from us or by emailing us [info @ seaottercanada.com](mailto:info@seaottercanada.com) (NOTE SPACES BETWEEN @). Some communications from us are considered transactional or service communications (for example, important account notifications and billing information), and your account(s) for Sea Otter Canada products and services are provided to you upon the condition that you receive these communications from us.

CHANGES TO THIS PRIVACY POLICY

Sea Otter Canada reserves the right to modify our privacy statement at any time, so please review it from time to time. If we make significant changes to this policy, we will notify you here, by email, or by a notice on our homepage so you continue to be aware of the information we collect, how we use it, and under what circumstances we disclose it.

For more information please contact [info @ seottercanada.com](mailto:info@seottercanada.com) (NOTE SPACES BETWEEN @).