PRIVACY POLICY FOR LOCAL LINE

localline.ca

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Local Line Inc. (also referred to herein as "Local Line", "us", "we", or "our") is committed to protecting the privacy and security of your personal information obtained by reason of your customer relationship with us. This Privacy Policy explains the types of customer personal information we collect, how it is used, and the steps we take to ensure your personal information is handled appropriately. Our policies and practices have been designed to comply with the *Personal Information Protection and Electronic Documents Act* (Canada) and corresponding provincial privacy acts. We encourage you to familiarize yourself with our privacy practices set forth herein.

By accessing or otherwise using locallinesites.com or site.localline.ca (each, a "**Website**" and collectively the "**Websites**") or any applications or services operated by us, you agree to be bound by this Privacy Policy. This Privacy Policy applies to personal information collected, used and maintained by us in conjunction with the use of our services and Websites and to personal information that you otherwise provide to us.

This Privacy Policy covers:

- 1. What is personal information?
- 2. How Local Line collects personal information
- 3. How Local Line uses personal information
- 4. How Local Line discloses or shares personal information
- 5. What about social media, third-party advertisers and links to other websites?
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What is personal information?

Personal information is information about an identifiable individual.

How Local Line collects personal information

Local Line collects only the information required to provide products and services to you. We will collect personal information only by clear, fair and lawful means.

We collect any personal information you enter on our Websites or give us in any other way. For example, we collect information from you when you register on our Websites, subscribe to a newsletter or enter information on the Websites.

We also collect personal information when you contact us through e-mail, telephone, mail, or use any chat functions to correspond with us or receive customer service.

The personal information we collect when you interact with the Websites or otherwise contact us may include:

- your name;
- your e-mail address;
- your mailing address;
- your phone number or other contact information; or
- your purchase preferences.

We also receive and store certain types of information automatically whenever you interact with us. For example, like many websites, we use "cookies," and we obtain certain types of information when your web browser accesses our Websites. For more information on how we use Cookies, see the "**How Local Line uses Cookies**" section below.

How Local Line uses personal information

Local Line uses your personal information for the following purposes:

- communicating with you generally and in response to customer service requests via e-mail and/or chat;
- processing your purchases through the Websites;
- processing and keeping track of transactions and reporting back to you on the status of those transactions;
- protecting against fraud or error;
- providing products and services requested by you;
- personalizing your experience and recommending products and services that Local Line believes will be of interest and provide value to you;
- facilitating ratings and reviews of services or products;
- performing statistical analyses of user behaviour and characteristics, in order to measure interest in and use of the various sections of the Websites so as to repair errors, improve design and navigation and to gather marketing information. Only aggregated data from these analyses, not individual data, will be used for this purpose;
- complying with legal and governmental requirements; or
- any other purpose to which you expressly consent.

You can change your consent preferences at any time. To change your preferences, refer to the "How to contact us" section below. If you change your consent to provide us with certain personal information, this may reduce or limit the functionality of the Website and the services we provide to you.

How Local Line discloses or shares your personal information

Local Line does not disclose personal information to any organization or person for any reason except the following:

- We may share your personal information with our service providers in order to complete your transactions and provide our products and services to you. For example, we may disclose personal information to fulfill orders, deliver packages, send e-mail, analyze data, process credit card payments, and provide customer service. We may use service providers located outside of Canada, and, if applicable, your personal information may be processed and stored in other countries and therefore may be subject to disclosure under the laws of those countries.
- If another person or organization administers a Local Line account that you use, we will share
 your information with that person or organization for the purpose of providing our products and
 services to you. For example, if a government organization purchases a Local Line account for
 you, we may share all information relating to your usage of Local Line with that government
 organization.
- We may release information when its release is required or appropriate to comply with the law, enforce our Website policies, or protect ours or others' rights, property or safety.
- In the event that we merge with or are acquired with a third party or such a transaction is proposed, we may share information we have about you for the purpose of completing this transaction.
- We may disclose your personal information for any other purpose to which you provide your express consent.

You are deemed to consent to disclosure of your personal information for those purposes. If your personal information is shared with third parties, those third parties are bound by agreements with Local Line to secure and protect the confidentiality of your personal information.

Local Line retains your personal information only as long as it is required for our business relationship or as required by applicable laws.

Information in aggregated form that cannot be used to identify you may also be provided to other parties for marketing, advertising, or other uses.

What about social media, third-party advertisers and links to other websites?

Our Websites may include third party advertising and links to other websites.

Third party links can cause you to leave our Websites and enter third party websites that are not under our control. In such situations, we do not control the privacy and confidentiality practices of the third parties. Accordingly, any personal information that is transmitted by use of third party websites is subject to the privacy policies of the relevant third parties. We encourage you to consult these policies in order to review how your personal information is collected, used, and disclosed by these third parties.

We may use social media (for example, Facebook and Twitter) in addition to the operation of our Websites. Social media accounts may be public and are not hosted by us. Users who decide to interact with us through social media must therefore read the terms of service and privacy policies of these thirdparties and the applications used to have access to them. The personal information that is provided to us by way of social media accounts is collected in order to record exchanges (for example, questions and answers, comments, "likes", shared tweets) between us and users so that we may, for example, answer requests, make statistical evaluations, prepare reports and for all other purposes indicated in this Privacy Policy.

How Local Line keeps your personal information up to date and accurate

Local Line keeps your personal information up to date, accurate and relevant for its intended use.

You may request access to the personal information we have on record in order to review and amend the information, as appropriate. In circumstances where your personal information has been provided by a third-party, we will refer you to that party (e.g. credit bureaus). To access your personal information, refer to the "How to contact us" section below.

The security of your personal information is a priority for Local Line

We take steps to safeguard your personal information, regardless of the format in which it is held. Local Line implements a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information. All transactions are processed through a gateway provider and are not stored or processed on our servers.

Unfortunately, data transmissions made by means of the internet cannot be made absolutely secure. Please keep in mind that if you give out personally identifiable information online, such information may be collected and used by unauthorized third-parties. It is important for you to protect against unauthorized access to your password and your devices. Be sure to sign off when you have finished using any shared device.

Do we use 'cookies'?

Yes. Cookies are alphanumeric identifiers that we transfer to your browser or your computer's hard drive, to enable our systems to recognize your browser and to provide features such as storage of items in your shopping cart between visits. Cookies are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

Examples of the information we collect and analyze using cookies include the Internet protocol (IP) address used to connect your computer to the Internet; device and connection information, such as browser type, version and timezone setting, browser plug-in types and versions, operating system, and platform; purchase history in order to streamline your purchases; clickstream to, through, and from our Website, including date and time; and products you viewed or searched for. We may also use browser data on certain parts of our Websites for fraud prevention and other purposes.

The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Because cookies allow you to take advantage of some of Local Line's essential features, your experience with the Websites may not be optimal if you reject all cookies. For instance, if you block or otherwise reject our cookies, you may not be able to add items to your shopping cart, proceed to checkout, or use any Local Line's products and services that require you to sign in. If you turn them off, you will still be able to place orders over the telephone by contacting us.

FullStory

We use behavioral data tools that help us understand how users interact with our Websites, which allows us to improve the online experience we offer visitors to our Websites. For example, we use FullStory in order to track users' experiences with our Websites. FullStory's privacy policy is available at https://www.fullstory.com/legal/privacy-policy.

Google

We use Google tools on our website to improve the functionality of our Websites and to understand how to improve our products and services. We use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our Websites. Google, as a third-party vendor, also uses cookies. For example, Google uses the DART cookie to serve advertisements to our users based on previous visits to the Websites and other sites on the Internet.

We have implemented the following Google tools on our Websites:

- Remarketing with Google AdSense; and
- Demographics and Interests Reporting.

Google's advertising requirements are available at: <u>https://support.google.com/adwordspolicy/answer/1316548?hl=en</u>. We encourage you to read these principles. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy at https://www.google.com/settings/ads/anonymous.

Local Line's Fair Information Practices

In correspondence with Fair Information Practices, we will take the following responsive action should a data breach occur: we will notify our users via in-site notification within 7 business days. We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

CAN-SPAM Act

We collect your e-mail address in order to:

- Send you information and respond to your inquiries, and/or other requests or questions;
- Process orders and to send information and updates pertaining to orders;
- Send you additional information related to your product and/or services;
- Market to our mailing list or continue to send e-mails to our clients after the original transaction has occurred; or
- For the other purposes set out in this Privacy Policy.

In accordance with The CAN-SPAM ACT, please note the following:

- We will not use false or misleading subjects or e-mail addresses in our communications.
- If we send you an advertisement, we will identify the message as an advertisement in some reasonable way.
- We will include an opt-out/unsubscribe link in our commercial messages with and honor your opt-out/unsubscribe requests promptly.

Disclaimer

While we make reasonable efforts to maintain the security of personal information in our custody or control, please be advised that the Internet and e-mail are inherently insecure media, and we do not warrant the security or privacy of personal information in transit over the Internet.

How to access your personal information

You can request access to your personal information stored by Local Line. To contact us, refer to the "How to contact us" section below. Upon receiving such a request, Local Line will:

- inform you about what type of personal information we have on record or in our control, how it is used and to whom it may have been disclosed;
- provide you with access to your information so you can review and verify the accuracy and completeness and request changes to the information; and
- make any necessary updates to your personal information.

How to contact us about our Privacy Policy

We are committed to providing you with understandable and easily available information about our policy and practices related to management of your personal information. This policy and any related information is available at all times on our websites under Privacy Policy or on request.

Local Line responds in a timely manner to your questions, concerns and complaints about the privacy of your personal information and our privacy policies and procedures.

You can contact our Chief Privacy Officer at:

- by e-mail at info@localline.ca;
- by mail to Local Line, 5 Michael Street, Kitchener, ON, N2G 1L7; or
- by calling 1-844-966-3541.

Changes to our Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we modify this Privacy Policy, we will update the date at the top of this Privacy Policy. We may also e-mail periodic reminders of our notices and conditions, unless you have instructed us not to. We encourage you to check our Website frequently to see recent changes to our Privacy Policy.