

Canoo Privacy Policy

Last Updated March 31, 2022

Introduction

Welcome to Canoo!

Canoo is a mobile application (an app) operated by the Institute for Canadian Citizenship (“**ICC**”) dedicated to bringing Canadian newcomers exclusive offers to events, venues, and experiences to encourage you to celebrate, enjoy, and explore your new home. We have partnered with a wide range of organizations to bring you offers for events, attractions, travel, shopping, and volunteer opportunities to bring you some of the best that Canada has to offer.

Canoo's services, programs, activities, and offerings are available through the Canoo app, which was formerly known as the Cultural Access Pass. By downloading, installing, accessing, or otherwise using the Canoo app or participating in the Canoo program you agree to be bound to our Privacy Policy (“**Policy**”).

Please take the time to familiarize yourself with this Policy, as it outlines how Canoo (“**us**,” “**our**,” and “**we**”), collects, uses, stores, and shares information when our users (“**you**” and “**your**”) interact with us. It also describes your privacy choices and how you can contact us if you have questions or would like to exercise your rights under applicable privacy laws. This Policy applies to all users of the Canoo app, including iOS and Android versions of the app, and any other services that are branded “Canoo” and link or reference this Policy (collectively, the “**Services**”).

We recommend that you periodically review this Policy as it may be updated or revised from time to time. If you do not agree to our practices, please do not register, subscribe, create an account, or otherwise interact with the Services. By signing up for, using, or continuing to use the Services, you consent to the privacy practices described in this policy.

This Policy is incorporated into and is subject to the Canoo Terms of Use.

Our Privacy Policy is organized as follows:

1. Types of Information We Collect
2. How We Use Information
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1. Types of Information We Collect

Canoo only collects Personal Information you choose to disclose while you interact with or use the Services, including when you take advantage of Canoo offers through our partners. We do not collect information about you that you have disclosed to third-party apps or websites, other than in relation to you redeeming Canoo offers.

We may ask you to provide information when you register, subscribe, or create an account for our Services, contact Canoo for customer service purposes, or otherwise interact with or use the Services. We may collect certain types of information, including information that can be used to reasonably identify you, such as your name, email address, mailing address, phone number, date of birth, geographic location, and mobile device data (as described below) ("**Personal Information**"), and information that does not identify you personally. We may collect the following types of information, including Personal Information:

- **Registration and Contact Information** that allows you to register for the Services and allows us to communicate with you, such as your full name, email address, password, telephone number, or other address at which you receive communications from or on behalf of Canoo. All personal information is anonymized in accordance with our retention policy once entered on the Canoo app and we do not retain a copy of your information.
- **Unique Identifier, Permanent Resident, and Citizenship Information** that helps us to verify your eligibility for Canoo Services, such as your IRCC assigned Unique Identifier, your Permanent Resident number, Citizenship Certificate number, PR expiration date, citizenship date, number of years in Canada, country of citizenship, and location of citizenship ceremony. Your Unique Identifier, Permanent Resident number, and Citizenship Certificate number are encrypted, and are primarily used for fraud prevention. Where it is necessary to view this information in decrypted form (for example, to address a customer service request), it is only made available to authorized ICC personnel under secure circumstances. If this information must be transmitted to IRCC, it is done securely (via SSL).
- **Relationships, Interests, and Preferences** that help us to understand who you are and what types of offers you might like, such as lifestyle, preference, and interest information; the types of offers that interest you; and demographic information (for example, date of birth, gender, country of origin, ethnicity, preferred language of communication, postal code, number of children, and marital status).
- **Camera** function on your device is used to populate information relevant to registering and activating your Canoo membership (such as information from your citizenship certificate). To determine your eligibility for Canoo Services, you may be asked to use your camera to provide a

scan of your permanent resident card or citizenship certification. Canoo uses this scan to populate information relevant for determining eligibility but does not retain any image of your permanent resident card or citizenship certificate. The scan and resulting processing occur on your device. The image of your permanent resident card or citizenship certificate is not transmitted to our servers over the Internet. If you do not wish to use the scanning features available through the Canoo app, you can verify your eligibility in other ways by contacting our customer service team using the secure online form available at <https://canoo.zendesk.com/hc/en-ca/requests/new> or as otherwise indicated when you register.

- **Search Information** meaning the terms or keywords you search for when using the Services on the Canoo app.
- **Transaction Information** about how you interact with the Services, such as the offers you view and redeem including the date and time of the redemption, and the events or programs you prefer; other information about how you use our Services, email, other communications, and applications; and how you interact with Canoo's business partners and service providers.
- **Location and Attendance Information** including province, city, or postal code, as well as precise location data and associated time of day. If you have activated our Services on a mobile device and permitted your mobile device to transmit location data, this allows Canoo to access your GPS location. By activating this feature, you agree to allow Canoo to use your GPS location to notify you about local offers and deals. For example, when you are at or near our partners, you agree that Canoo may collect and use your location information including to tell you about offers that may be nearby, even when the Canoo app is running in the background. Also, if you take advantage of an offer and attend attractions, venues, or events, you will “check in” when you arrive to redeem the offer, and we will email you on behalf of our partner to receive feedback about your experience. Please note that when you redeem an offer, you may also be asked to provide your information directly to our partner through their website, by phone, or in person, and we encourage you to review that partner’s privacy policy, which will govern how they handle your personal information.
- **Mobile Device Information.** We collect certain information about your mobile device when you download the Canoo app or use our Services, including device identifier (such as the Android Advertising ID and the Apple iOS IDFA); user settings; the make, model, and operating system of your device; information about other applications installed on your device; telecom or mobile carrier and service provider; and information about your use of our Services while using the device, such as which features of the app that you use, clicks on notifications or content on the app, and the referring URLs you came from.
- **Communications and other Interactions.** We collect any information you provide when you contact us with questions, comments, concerns, or requests or when you interact with other users on the Service. For example, we collect information on any recommendations you may make to other users of our Services.

- **Information from Our Partners and Third Parties.** We may receive information about you from our partners when you take advantage of their offers. We may also receive information from other third parties in accordance with their respective terms and conditions and/or privacy policies and combine it with information we have about you.
- **Information from IRCC.** We may communicate with IRCC to verify that the permanent resident and citizenship information you provided to us is accurate, including for fraud prevention. We may also communicate with IRCC to determine whether you were granted Canadian citizenship, as one of our goals is to encourage newcomers to Canada to become citizens.

Pixel tags and web beacons

Pixel tags and web beacons are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed specific actions. When you access these pages or open email messages, the pixel tags and web beacons generate a notice of that action to us or our service providers. These tools allow us to measure the response to our communications and improve our web pages and promotions.

In many cases, the information we collect is used in non-identifiable ways without any reference to Personal Information. For example, we use information we collect about users to optimize our Services and understand its traffic and usage patterns. In other cases, we associate the information we collect using cookies and related technologies with Personal Information. In that case, this Policy governs how we use that information. Additionally, if you have activated one of our mobile-device applications, and if the settings on your location-aware device allow us to receive your location information, we may collect that location information automatically. If we associate location information with other Personal Information, this Policy governs how we would use that information too.

2. How We Use Information

We use the information we collect from and about you to help you discover new offers and learn about events and programs in your area that are available through our partners. We also use the information to enhance your experience using the Canoo app and to enable you to redeem offers and deals through our partners.

We also use information to:

- Set up and administer your registration for our Services, including to establish and evaluate your eligibility for certain offers, events, programs, or services;
- Analyze and understand how you use our Services and interact with the Canoo app to make improvements to our content and/or functionality and develop new features, products, or services;

- Evaluate the types of offers, products, or services that may be of interest to you and provide you with tailored offers, promotions, and information from our partners, including offers based on variables such as stated and anticipated interests, personal characteristics, consumption of advertisements, past searches, past offer redemptions, or location;
- Track redemption of offers;
- Provide customer support;
- Communicate with you and provide additional information which may be of interest to you about Canoo and our partners, such as Canoo news, special offers, updates, and announcements;
- Infer the location of the places you visit most often, determine your frequency or the amount of time spent at these locations, and send notifications when you arrive at or leave those places;
- Give you the most relevant program and event recommendations and alerts. Canoo uses background location tracking to show you personalized content and send you relevant push notifications when you're near a venue with supported offers.
- Send you reminders, technical notices, updates, security alerts, and support and administrative messages, service bulletins, or marketing;
- Provide advertisements and marketing solicitations to you through the Services, email messages, text messages, push notifications, applications, or other methods of communication;
- Administer surveys, contests, or other promotional activities or events sponsored by us or our partners, including contacting past users of the Canoo app;
- Research and analytics, including to measure the quality and effectiveness of the Canoo app and the attitude and behaviours of new Canadians;
- Soliciting donations from current and past users of the Canoo app;
- Combat spam, malware, malicious activities, or security risks; improve and enforce our security measures; and monitor and verify your identity so that unauthorized users do not gain access to your information;
- Improve your experience with the Canoo app;
- Manage our everyday business needs such as application maintenance and management, analytics, fraud prevention, Terms of Use, to comply with the law, and to protect against security risks; and
- Carry out other purposes to which you consent.

In addition to the foregoing, we may aggregate information and use it for any purpose. When we do this, the aggregate information is de-identified or anonymized so that you are not individually identified. We anonymize data through techniques such as what is called "data generalization" and "differential privacy", and we prohibit attempts to re-identify the data.

3. When and Why Canoo Shares and Discloses Information

Service Providers. We may share information with our service providers that provide services for us to assist us in carrying out the purposes described in Section 2 above. These service providers or third parties may have access to your Personal Information to perform services on our behalf. Some of our service providers may be located in jurisdictions outside of Canada, including the United States, and other countries as applicable, and are therefore subject to the laws of those jurisdictions. We contractually require any third-party service providers to comply with Canadian privacy law and the protections set in this Policy as well as to audit them for compliance.

Partners. We work with various partners so they can provide discounts and other offers to you when you use our Services. To facilitate these activities, we may share aggregate (grouped) information about our users our partners, such as the total number of people who looked at their Canoo page, but we do not share your personal information with our partners. We encourage Canoo's partners to adopt and post their privacy policies. The use of your information by such parties is governed by their privacy policies and is not subject to our control. When you choose to take advantage of an offer from one of our partners, or otherwise interact with a Canoo partner, you agree that we may verify with that partner that you are a valid Canoo member and that the information you provided to them matches the information we collected from your Citizenship Certificate or Permanent Resident Card. We encourage you to read any privacy policy they may have posted on their website.

IRCC. We may communicate with the IRCC to verify that the permanent resident and citizenship information you provided to us is accurate, including for fraud prevention. We may also communicate with IRCC to determine whether you applied for and were granted Canadian citizenship. One of our objectives is to encourage users to become citizens of Canada. This information is encrypted and is securely transmitted using a Secure Sockets Layer (“SSL”) to the IRCC. SSL is a security protocol that creates an encrypted link between a web server and a web browser. To put it simply, this means that our connection to IRCC servers is secure and encrypted and any data we send is safely shared.

Third Parties. Canoo shares information with third parties and service providers, but other than (i) hashed information, device identifiers, or location information (in each case anonymized and/or pseudonymized), and (ii) information shared with third-party service providers who only use the information to assist us with internal management of our Services (for example, to detect and prevent fraud), we do not disclose your contact information or other personally identifiable information. We share information with third parties to assist us in carrying out the purposes described in Section 2 above.

Merger, Sale, or Other Asset Transfers. We may share your information to effect a merger, acquisition, or otherwise, and to support the sale or transfer of business assets. Canoo is operated by the ICC, which is a registered charity. It is therefore highly improbable that Canoo will ever be sold or acquired. In the unlikely event that Canoo is involved in a merger, acquisition, or sale of all or a portion of its assets, or transfer of all or a portion of its assets to another registered charity, you will be notified via email and/or prominent notice on one or more of our Services of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

As Required by Law, to Enforce Laws and Similar Disclosures. We may also disclose Personal Information: to defend ourselves in litigation or a regulatory action; when required by law or advised to do so by our legal advisors, such as in response to law enforcement agencies, regulators, or a court order; to enforce our rights or protect our property; to protect the rights, property, or safety of others; to investigate fraud; to respond to a government request; or as needed to support auditing, compliance, and corporate governance functions.

Aggregate Data. Canoo may also disclose information about you that is not personally identifiable. For example, we may provide our business partners, or other third parties with reports that contain aggregated data, statistical data, and/or anonymized data.

Consent. We may also share your information with other third parties with your consent.

4. Data Safeguards and Security

Canoo has implemented administrative, technical, and physical measures to protect your personal information from unauthorised access and against unlawful processing, accidental loss, destruction, theft, and damage. The nature of our security controls varies depending on the sensitivity of the information that has been collected; the amount, distribution, and format of the information; and the method of storage. More sensitive Personal Information is safeguarded by a higher level of protection. However, no online activity is ever fully secure or error-free. The transmission of information via the internet is not completely secure. Although we will take steps to protect your personal information, we cannot guarantee the security of your personal information or other data transmitted to or from the Canoo app; any transmission is at your own risk.

Generally, Canoo stores, accesses, and uses personal information in Canada in the province of Quebec . However, some of our service providers may be located outside of Canada including, but not limited, to the United States and Ireland. In those cases, the personal information may be subject to the laws of the jurisdiction in which the information is used, accessed, or stored. We restrict access to your personal information to Canoo employees and authorized service providers who require access to fulfill their job requirements. Canoo cannot control whether your internet service provider routes traffic through network nodes outside of Canada.

5. Your Consent

Consent to the collection, use, and disclosure of personal information may be given in various ways. Consent can be express (for example, orally, electronically, or on a form you may sign describing the intended uses and disclosures of personal information) or implied (for example, when you provide Canoo with information necessary for our Services). Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney).

Generally, by registering for our Services and by downloading, installing, accessing, or otherwise using the Canoo app, you are indicating that you consent to our collection, use, and disclosure of such information

for the purposes identified or described in this Policy and as otherwise permitted or required by law. However, we may seek your consent to use or disclose personal information after it has been collected in cases where we wish to use or disclose the information for a purpose not previously identified or expressed in this Policy.

If you need to provide us with personal information about other individuals, you represent and warrant to us that you are their legal guardian or otherwise that you have their consent.

You may withdraw your consent to our collection, use, and disclosure of personal information at any time, subject to reasonable notice and any legal and/or contractual restrictions. To notify us that you wish to withdraw your consent, please contact us as described below. On receipt of notice of withdrawal of consent, we will inform you of the likely consequences of the withdrawal of consent, which may include our inability to provide certain products, services, or offers for which that information is necessary.

6. Accessing and Correcting Your Information

Keeping your information helps ensure that we provide you with the best offers available through our business partners. Canoo seeks to ensure that any personal information provided by its users and past users is as accurate, complete, and up-to-date as possible in order to fulfill the purpose for which it was obtained.

You have the right to access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. You may request access, updating, and corrections of inaccuracies in other personal information we have in our custody or control by emailing or writing to us at the contact information set out below. We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records and may restrict access to personal information as required or permitted by applicable law or legal process.

You may request that Canoo delete your personal information, or you may withdraw or modify your consent to any ongoing and future collection and use of personal information at any time, subject to legal and technological restrictions, provided that reasonable notice is given to us. Your withdrawal of consent to our collection, use, and disclosure of your personal information may prevent us from providing you, or continuing to provide you, with our products, events, and Services.

7. Data Retention

We will retain your Personal Information where we have an ongoing legitimate business need to do so (for example, while you hold an account with us and for a reasonable period of time thereafter, or to enable us to meet our legal, tax, or accounting obligations). We may retain certain data as necessary to prevent fraud or future abuse, resolve disputes, enforce our agreements, or for legitimate business purposes, such as analysis of aggregated, non-personal information, or account recovery, or if required or permitted by law. All retained personal information will remain subject to the terms of this Policy. If you

request that your name be removed from our databases, it may not be possible to completely delete or anonymize all your personal information due to technological and legal constraints.

8. Third-Party Sites

The Canoo app may contain links or references to other websites that are not controlled by Canoo. Please be advised that these third parties are not under our control and Canoo is not responsible for their privacy policies or practices. When you click on such a link, you will leave our service and go to another site. During this process, another entity may collect personal information from you. If you provide any Personal Information to any third party or through any such third-party website, we recommend that you familiarize yourself with the privacy policies and practices of that third party.

9. Children's Privacy

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of the Service is directed to children. If you learn that a child has provided us with personal information in violation of this Policy, then you may alert us at the contact information set out below.

10. Changes and Updates to this Privacy Policy

We may occasionally update this Policy. When we do, we will revise the "last updated" date at the top of the policy. If there are material changes to this policy, we will use reasonable efforts to notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification.

11. Our Contact Information

Please contact us with any questions or comments about this Policy, your information, our use and disclosure practices, or your consent choices by email to our Privacy Officer at privacy@inclusion.ca, or our mailing address:

Institute for Canadian Citizenship,
260 Spadina Avenue, Suite 500
Toronto, Ontario M5T 2E4
Attention: Privacy Officer.