

## PRIVACY POLICY

This Privacy Policy describes how Your True Companion Pet Products. ("True Companion"/"we"/"us"/"our") collects, uses, stores and distributes information about viewers and users ("you"/"user") of our website located at <http://companionpetproducts.ca/> (the "Website") and users of the companionpetproducts.ca App (the "App").

**Consent:** By using the Website or the App you consent to the use of your Personal Information as described in this Privacy Policy. **You may withdraw your consent to our processing of your Personal Information at any time. However, withdrawing consent may result in your inability to continue using the Website, the App or certain features of them.**

**"Personal Information"** is information that identifies an individual, such as your name, address, e-mail address, credit card information, birth date and gender. At the time of collection, we will clearly identify the information being collected and the purposes for which it will be used.

**"Non-Personal Information"** is information of an anonymous nature, such as an Internet Protocol Address (IP Address), the domain used to access the Website, and the type and version of browser or operating system being used by visitors to the Website. Aggregate information, such as demographic statistics of our users (e.g. average age or geographical allocation of our users), number of visitors, what pages' users access or visit, and average time spent on the Website is not considered Personal Information. Similarly, business contact information such as the name, title, business address, e-mail address, or telephone number of a business or professional person or an employee of an organization is not considered Personal Information.

Although the use of certain Non-Personal Information collected, used or disclosed as described herein is not restricted (and to the extent that such is the case, the obligations under this Privacy Policy do not apply to such information), we provide information in this Privacy Policy about the collection of such information for the sake of transparency with respect to the operation of the Website and the App.

### What type of Personal Information does True Companion collect and how is it used?

True Companion collects information that helps us process your purchases and personalize and improve your shopping experience. Here are the types of information that we gather:

- **Registration:** In order to make purchases through the Website or the App, you must register for an account and provide certain Personal Information to us such as your full name, date of birth and email address.
- **Purchases:** When you make a purchase through the Website or the App, we may collect the following information: e-mail address, billing address, mailing address, pseudonyms, phone number, IP address, True Companion password, personal preferences, group affiliations, payment and billing information. During checkout, you have the option to have us remember your credit card number for future purchases. We do this using a technology called "payment tokenization". That's just a fancy way of saying we don't actually store any information about your credit card number at all. Instead, when you complete a purchase we use your credit card number to get a secret token - a special random string of letters and numbers that has nothing to do with your credit card information - from the credit card payment provider. Then, when you want to make your next purchase, instead of sending your credit card number to the credit card payment provider we send the secret token. Just like all of our other financial transactions, this is done over a secure, encrypted communication line. We use third party freight providers to deliver your purchases, and accordingly we share your name, phone number, email address and shipping address with such providers for the purposes of completing your delivery.

- **Mobile Location Data:** If you download the App, we will ask you if you want to give our App access to your mobile device's location. If you grant the App access to your mobile location, we will collect location data for analytics and to better provide our Services to you.
- **Communications with us:** When you contact us through email, through submitting a customer review or survey, entering a contest on Companionpetproducts.ca, or by telephone, we collect the information that you provide to us in the course of the communication.
- **Transactional Notifications:** We provide notifications for certain activities relating to your use of our Services despite your indicated e-mail preferences, for example we may send you notices of any updates to our Privacy Policy.
- **Marketing Communications:** If you opt-in to receive marketing communications from us, we will keep you up to date on our products and services. You may withdraw your consent to receiving marketing communications from us at any time by following the opt-out instructions in each communication, or by contacting our customer care department at [info@companionpetproducts.ca](mailto:info@companionpetproducts.ca).
- **Statistics:** We also collect statistics about use of the Services purchased through the Website or the App. This information will be kept confidential, however, aggregate statistics that do not personally identify an individual will be kept by us and such aggregate statistics may be made available to other members or third parties.
- **System Logs & Cookies:** Like many websites, we use "cookies" to collect certain types of information when your Web browser accesses our Website. Cookies are alphanumeric identifiers that are placed on your computer's hard drive to enable our systems to recognize your browser and to provide features such as remembering the products that you searched on your last visit. Well.ca uses cookies to remember information you gave us so that you don't have to re-enter the information each time you visit our Website. You can prevent your computer from accepting new cookies. Most browsers tell you how to do so in their "help" section. Because cookies allow you to take advantage of some of True Companion's features, we recommend you leave them turned on. For instance, if you block our cookies, you will not be able to buy something from the Website.

Your IP address is reported by your web browser whenever you visit a page on the Website. This information is recorded together with your registration information on our databases.

- **Advertisements:** Advertisements appearing on the Website or the App may be delivered by us or one or more third-party web advertisers. These third party web advertisers may set cookies. These cookies allow the advertisement server operated by that third party to recognize your computer each time they send you an online advertisement. Accordingly, advertisement servers may compile information about where or whether you viewed their advertisements and which advertisements you clicked on. This information allows web advertisers to deliver targeted advertisements that they believe will be of most interest to you. The Privacy Policy applies to cookies placed on your computer by us, but does not cover the use of cookies by any third-party web advertisers. For the privacy practices of such third-party web advertisers, you should consult the applicable privacy policy for the relevant third-party web advertiser(s).

If we plan to use your Personal Information in future for any other purposes not identified above, we will only do so after informing you by updating this Privacy Policy.

#### **In what circumstances do we disclose and transfer Personal Information?**

We have put in place contractual and other organizational safeguards with our agents to ensure a proper level of protection of your Personal Information. In addition to those measures, we will not disclose or transfer your Personal Information to third parties without your permission, except as specified in this Privacy Policy.

As at the date of this Privacy Policy, we share only the relevant Personal Information about you in respect of the Website and the App to our service providers which include website hosting providers, third party e-commerce software providers, payment processors, email service providers, freight carriers, third party marketing platforms and advertising networks. Our servers and service providers are located in Canada and in the United States and accordingly your Personal Information may be available to Canadian and United States government or agencies under a lawful order, irrespective of the safeguards we have put in place for the protection of your Personal Information.

From time to time we may employ third parties to help us improve the Website and/or the App. These third parties may have limited access to databases of user information solely for the purpose of helping us to improve the Website and/or the App and they will be subject to contractual restrictions prohibiting them from using the information about our members for any other purpose.

**Important Exceptions:** We may disclose your Personal Information to third parties without your consent if we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of the Website or the App, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. We may disclose Personal Information when we believe in good faith that such disclosure is required by and in accordance with the law.

We may also disclose your Personal Information in connection with a corporate re-organization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to the same, provided that the information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the information.

**Security:** The security of your Personal Information is important to us. We use commercially reasonable efforts to store and maintain your Personal Information in a secure environment. We take technical, contractual, administrative, and physical security steps designed to protect Personal Information that you provide to us. We have implemented procedures designed to limit the dissemination of your Personal Information to only such designated staff as are reasonably necessary to carry out the stated purposes we have communicated to you.

In certain areas, such as when you provide credit card or other payment information to us, the Website works to help protect the security of your credit card and other payment information during transmission by using industry standard Secure Sockets Layer (SSL) encryption technology.

You are also responsible for helping to protect the security of your Personal Information. For instance, never give out your email account information or your password to third parties.

**Retention:** We will keep your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained personal information will remain subject to the terms of this Privacy Policy. If you request that your name be removed from our databases, it may not be possible to completely delete all your Personal Information due to technological and legal constraints.

**Transfer of Your Information Outside of Canada:** Your information may be processed and/or stored outside of Canada. While True Companion undertakes measures to protect your personal information when it is stored and/or processed in other jurisdictions, the laws of other countries may not provide the degree of protection for personal information that is available in Canada. However, if your personal information is transferred outside Canada, it may be available to the foreign government of the country in which the information or entity controlling it is situated under a lawful order made in that country and used for purposes other than those described herein. By providing us with your information, you are allowing your personal information to be transferred outside of Canada.

**Amendment of this Policy:** We reserve the right to change this Privacy Policy at any time. If we decide to change this Privacy Policy in the future, we will post an appropriate notice on the home page at <http://companionpetproducts.ca/news>. Any non-material change (such as clarifications) to this Privacy Policy will become effective on the date the change is posted and any material changes will become effective 30 days from their posting on the Website. Unless stated otherwise, our current Privacy Policy applies to all Personal Information that we have about you. The date on which the latest update was made is indicated at the bottom of this document. We recommend that you print a copy of this Privacy Policy for your reference and revisit this policy from time to time to ensure you are aware of any changes. Your continued use of the Website signifies your acceptance of any changes.

**Access and Accuracy:** 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 to you and to have a general account of our uses of that 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 information available to you such as where that information also pertains to another user. In such circumstances we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner.

We will make every reasonable effort to keep your Personal Information accurate and up-to-date, and we will provide you with mechanisms to update, correct, delete or add to your Personal Information as appropriate. As appropriate, this amended Personal Information will be transmitted to those parties to which we are permitted to disclose your information. Having accurate Personal Information about you enables us to give you the best possible service.

**Contact Us:** You can help by keeping us informed of any changes such as a change of address or telephone number. If you would like to access your information, if you have any questions, comments or suggestions or if you find any errors in our information about you, please contact us at: [info@companionpetproducts.ca](mailto:info@companionpetproducts.ca).

**Last Updated:** February 08, 2016

**1.855.260.5024**