

## TUBE TOP CREATIVE INC.

### PRIVACY POLICY

#### INTRODUCTION

At Tube Top Creative Inc. (the "Company"), we are committed to building character driven content ecosystems for our clients. As providing this service may involve the collection, use and disclosure of some personal information about our customers, protecting their personal information is one of our highest priorities.

Our use of the personal information we collect from our customers is subject to the British Columbia *Personal Information Protection Act* ("PIPA") and/or the federal Canadian *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). PIPA and PIPEDA (as applicable) set out the ground rules for how British Columbia businesses may collect, use and disclose personal information.

In accordance with PIPA and PIPEDA (as applicable), we will inform our customers of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Privacy Policy, in compliance with PIPA and PIPEDA (as applicable), outlines the principles and practices we will follow in protecting the personal information of our customers. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of that personal information and allowing our customers to request access to, and correction of, their personal information.

#### SCOPE OF POLICY

This Privacy Policy applies to the Company and to any service providers collecting, using or disclosing personal information on behalf of the Company. This Privacy Policy does not apply to any service providers or other parties that you choose to link to your account or otherwise provide access to any account or personal profile you establish with the Company. In those instances, the privacy policies of such service providers and other parties may apply.

#### DEFINITIONS

**Personal information** - means information about an identifiable individual, which may include such information as name, age, gender, home address, phone number, e-mail address, social insurance number, username, password and credit card information. Personal information does not include business contact information (described below).

**Business contact information** - means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or by PIPA or PIPEDA (as applicable).

**Privacy Officer** - means the individual designated responsibility for ensuring that the Company complies with this policy and with PIPA and PIPEDA (as applicable).

## **POLICY 1 – COLLECTING PERSONAL INFORMATION**

Unless the purposes for collecting personal information are obvious and the customer or user voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

We will only collect personal information of customers that is necessary to fulfill the following purposes:

- To verify identity;
- To identify customer and user preferences;
- To understand the needs of our customers with respect to our products and services and enhance their experience using our services;
- To open and manage a user account and/or personal profile (where applicable);
- To schedule requested services;
- To deliver marketing, newsletters and other notices, updates, alerts and other information concerning our products services that may be of interest to our customers;
- To ensure a high standard of service to our customers;
- To collect and process payments;
- To meet regulatory requirements;

We use cookies to gather information on website use, provide more personalized service and targeted advertising. Our website uses third party marketing products for analysis, marketing and personalization. You can withdraw your consent to our use of these cookies at any time by accessing settings on your browser and clearing data about cookies.

We do not knowingly collect personal information directly from children under the age of 13 without parental consent. Our website is not specifically targeted to our intended for use by children.

## **POLICY 2 – CONSENT**

We will get your consent to collect, use or disclose your personal information, except where we are legally authorized or required by law to do so without consent.

We will obtain your consent by notifying you of the purposes for collecting your personal information, including by listing the purposes in this policy. Your consent may be oral, in writing or electronic, and may be implied by your use of features of our website which result in providing personal information to us. Consent will not be required beyond what is necessary to provide you services. Please be aware that if you do not consent to (or withdraw your consent for) use of cookies some features of our website may not work properly. You may withdraw your consent at any time by providing to us reasonable notice, unless we require that personal information to complete our legal obligations to you under a contract for service.

### **POLICY 3 - USE AND DISCLOSURE**

We will not collect, use or disclose personal information except for the purposes identified, unless you have provided us with consent for those additional purposes or where authorized or required by law.

We use third parties to provide services to us or to you. This includes managing customer information, sending marketing communications, conducting surveys, hosting our websites, analyzing data, processing payment, collecting overdue payments, providing network security, accounting, auditing and other services. For example, we use a series of payment systems through our website provider and you can find more information about their privacy policies here:

<https://www.wix.com/about/privacy>

[https://payments.google.com/payments/apis-secure/get legal document?ldo=0&ldt=privacynotice&ldl=en](https://payments.google.com/payments/apis-secure/get%20legal%20document?ldo=0&ldt=privacynotice&ldl=en)

<https://www.apple.com/legal/privacy/data/en/apple-pay/>

<https://shop.moneris.com/service/privacy/>

[https://www.visa.ca/en CA/legal/global-privacy-notice.html](https://www.visa.ca/en_CA/legal/global-privacy-notice.html)

<https://www.mastercard.com/ca/en/global-privacy-policy.html>

<https://www.global.jcb/en/about-us/policy/privacy/index.html>

<https://www.americanexpress.com/en-ca/company/legal/privacy-centre/privacy-statement/>

<https://www.unionpayintl.com/en/privacyNotice/>

<https://www.discover.com/privacy-statement/credit-cards-privacy-policy.html>

<https://www.dinersclub.com/privacy-policy/>

We do not authorize these service providers to use or disclose your personal information for purposes other than why we have retained them. Some of the services providers we use have data storage outside of Canada, including in the United States. In certain circumstances, law enforcement or security agencies of those other countries may be entitled to access your personal information.

### **POLICY 4 - RETENTION**

We retain personal information for as long as is required to fulfill the purposes, after which we securely destroy or anonymize personal information. We retain personal information used in connection with a tax return filed with the Canada Revenue Agency for six years, and personal information used in connection with a decision which affects you for at least one year. If you join our mailing list, we will keep your personal information used in connection with the mailing list for so long as you remain subscribed.

#### **POLICY 5 - ACCURACY**

We use reasonable efforts to ensure our records of your personal information are accurate and complete if to be used to make a decision which affects you or disclosed to a third party. You may request that we correct any errors or omissions in your personal information that we have collected, and we will either correct that information or annotate our records to reflect your request.

#### **POLICY 6 - SAFEGUARDS**

We protect your personal information by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, modification or disposal of personal information. The safeguards we take depend on the sensitivity of the personal information, and include physical security of our premises, passwords and encryption.

#### **POLICY 7 - INDIVIDUAL ACCESS**

You have a right to access the personal information that we have about you and information about the ways in which your personal information is used by us. Please make your request for access and information in writing to our Privacy Officer, whose contact information is provided below. We may require you to prove your identity by producing government issued identification before we provide any access to your personal information. We may charge you a fee before releasing the personal information, and where a fee is required, we will provide you a written fee estimate in advance. We will provide you access within the time limits required by PIPA and PIPEDA (as applicable), unless we receive an extension. If we are authorized under PIPA and PIPEDA (as applicable) to refuse access, we will let you know in writing the reasons and what other steps you have available to you.

#### **POLICY 8 - CONTACT INFORMATION**

For any questions regarding our privacy policy or your personal information, please contact our Privacy Officer at [alex@tubetopcreative.com](mailto:alex@tubetopcreative.com)

#### **POLICY 9 - CHANGES**

We may change our Privacy Policy from time to time, and any such changes will be posted in this Privacy Policy.