

Jim Pattison Broadcast Group Limited Partnership (JPBG)

Customer Privacy Policy

Last Updated – September 2017

1. JPBG's Commitment to Privacy

Protecting your privacy is important to JPBG. As part of our commitment to privacy protection, we have implemented this Privacy Policy, which explains our privacy practices, including those of our Websites. We may change this Privacy Policy from time to time to better serve your needs. Notice of any changes will be provided on our Websites and a copy of all amendments is on file at our offices. You can be sure that our Privacy Policy satisfies all of the requirements of applicable privacy law, including Canada's Personal Information Protection and Electronic Documents Act ("PIPED Act").

This Privacy Policy governs the way we manage your Personal Information. If you have any questions or concerns about your privacy, please contact us, using the contact information at the end of this policy.

Whenever you provide us with Personal Information, whether in writing, over the telephone, or online, you will be referred to this Privacy Policy. If you do not agree with our Policy, please contact us at the address given at the end of this Policy, we would be pleased to address your concerns.

2. What is "Personal Information"?

"Personal Information" is information about you as an individual. Examples include your name, mailing and e-mail addresses, age, birthday, telephone number, picture and voice recording. Your personal preferences, such as your favourite colour or flavour of ice cream, could also qualify as Personal Information if connected with other information that identifies you. This Privacy Policy describes the types of Personal Information that we collect, how we collect it, why we collect it and what we use it for.

"Non-identifiable Information" is information that cannot be associated with, or traced back to, a specific person. Non-identifiable information includes: anonymous aggregated information, information about your visits to our Websites which is not linked to you, information about your computer's operating system and web browser software. Your computer and its operating systems, browsers, and memory contain vast quantities of transaction data and records of your use of it. This Personal Information could be gleaned from these systems by outsiders if you do not take steps to protect your system. It is our policy not to associate this information with customers, even though we verify some kinds of technical information to ensure that our Websites are optimized to serve our customers.

When you interact with our Websites, we may use a browser feature, known as a “cookie”, to verify non-identifiable information about visitors to our Websites and measure visitor traffic patterns. We do this to maintain the best possible Websites. A cookie is a small computer file. When you first visit our Websites, the Website manager may have implemented a program that creates a small computer file stored on your computer’s hard drive. We ensure that the minimum information required is placed in the cookie only so that we can recognize returning Website visitors. The cookie does not contain Personal Information and we will not combine information in the cookie with Personal Information that would enable us to identify you individually. On subsequent visits to the Website, our server communicates with your computer, reads the cookie, recognizes and confirms that you are a returning visitor. Our server uses this information to provide you with a “short cut” that facilitates the quickest, most efficient and best possible Website experience.

In addition, third parties like our advertising partners could use "cookies" to verify Non-identifiable Information about you. Information collected in this fashion could be used to identify your behaviour, preferences and interests. This usage is subject to the privacy policy of such third parties.

Most browser softwares allow you to delete cookies. You should consult your Internet service provider for information on how to delete cookies. This may interfere with our ability to personalize your experience at our Websites and be recognized, or may slow down performance.

3. Collection and Use of Personal Information

We collect Personal Information in the following circumstances:

- When you join a club or become a member through this Website, by regular mail or by using SMS text messaging;
- When you enter a contest or other promotion through this Website, by regular mail or by using SMS text messaging;
- When you subscribe to our e-mail newsletter(s);
- When you respond to online questionnaires;
- When you participate in interactive online activities (including games, chatrooms or bulletin boards); or
- When you contact us to make requests or comment on our services.

This Website may include links to third party websites. These third parties have separate and independent privacy policies. Any personal information you share with these third parties through their websites will be administered under their privacy policies. JPBG has no control over third party privacy policies and therefore has no responsibility or liability for the manner in which third parties may collect, use or disclose and otherwise treat your personal information.

Further details regarding our collection and use of Personal Information is set out below.

1. Clubs or Memberships

Some of our sites may offer you the opportunity to become a member or belong to a club, so that you can participate on a regular basis in games, bulletin boards, contests and other activities offered on the site. We do collect Personal Information when you join in accordance with the following principles:

- We collect only the information necessary for the activities offered; and
- Access to our activities is never conditional upon you providing more Personal Information than is necessary for such activities.

2. Contests

When you enter a contest, you may be required to provide the following Personal Information: your name, address or province of residence, e-mail address, telephone number and, where an age eligibility requirement applies, your age range. This Personal Information is collected solely for the purpose of identifying and communicating with contest prizewinners. Personal Information from non-winners is destroyed, in accordance with applicable legal requirements. When an affidavit of eligibility and release is sent to the prizewinner's parent or legal guardian, it must be signed and returned before the prize can be awarded. If the release is not returned within the specified time period, the winner forfeits the prize and an alternative winner may be chosen.

3. Online Questionnaires

From time to time, we may request your feedback on an activity, product or service that we offer or provide or on content on our Websites. We ask for your name and e-mail address when you are providing us with feedback so that we may reply to you, but you always have the option of providing us the feedback without sharing this information.

4. Other Online Activities

When you visit our Websites and participate in other online activities, we may collect information such as your name, nickname, age category, preferences, opinions, etc. Whether or not you are required to join a club or become a member of the site to participate in these activities we always comply with the principles stated in subsection above with respect to clubs or memberships.

5. Contacting Customer Service

If you telephone, write or e-mail us to comment on one of our services or Websites, we will retain the information for our records during a certain period of time. Disclosure of your name and Personal Information is voluntary in this circumstance.

4. Disclosure of Personal Information

We will not disclose your Personal Information unless required by law. We must provide your Personal Information in response to a search warrant or other legally valid enquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by law. We use your Personal Information for internal purposes only. We do not sell, rent or trade in Personal Information. We may transfer information to third parties who need such Personal Information to provide services on behalf of JPBG. Any such service providers are contractually bound to maintain the confidentiality of such transferred Personal Information and are prohibited from using the Personal Information for any other purpose. Your consent to our use of Personal Information can be withdrawn at any time by following the directions at the end of this policy. We will obtain your consent before using your Personal Information for any purpose other than these above. Once your Personal Information is no longer required for the purposes above, it will be deleted.

5. Security and Safeguards

We know how important privacy is to you. That is why we protect and safeguard your Personal Information. Our security policies govern the protection of the information on our information systems, the way we protect our Websites from malicious attack, and the way in which we dispose of information no longer needed. We screen and train our employees carefully to ensure that they will always have the highest regard for you and your privacy, and we restrict access to your Personal Information to only those with a need to know.

We make best efforts to keep our servers in a safe environment and protect our information technology infrastructure from abuse. Security on the Internet is a continuously evolving problem and work to keep up with the latest trends. If you receive any electronic communication which purports to be from a member of the JPBG that you have any questions or concerns about, please contact us. Spam, improper use, and pirating of domain names and email addresses is a growing problem, so we appreciate hearing about incidents in order that we may investigate them and provide you the best customer service.

6 Contact Us With Concerns, to Update Your Personal Information, to Opt Out or To Complain

We have tried to anticipate and meet all of your expectations with respect to the treatment of your Personal Information and the privacy of your online experience with us. If you have any concerns or questions, please contact us at the address below. This is the address to contact if you:

- Have questions or concerns about our treatment of your Personal Information;
- Wish to update or access your Personal Information;
- Want to withdraw your consent to the collection and use of your Personal Information, or the information of your child if you are a parent or guardian; or
- Wish to cancel an on line newsletter subscription.

Please contact:

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