

# Privacy Policy (Canada)

Vidigami Canada Corporation ('VCC,' 'we,' 'us,' 'our') knows that you care about how your personal information is used and shared, and takes your privacy seriously. Please read the following to learn more about our Privacy Policy. By visiting the websites or accessing or using the Services of VCC, A Milestone Group, Milestone Yearbooks, Picaboo Yearbooks you accept the practices and policies outlined in this Privacy Policy and you are consenting to have your personal data transferred to and processed in Canada. Capitalized terms used herein without definition shall have the meaning given to them in the Terms of Service <https://amilestonegroup.com/terms-of-service-canada/>.

You post any Content on the Services at your own risk. Although we take every precaution to protect your Content and may allow you to set privacy options that limit access to your information, please be aware that no security measures are perfect or impenetrable. Further, we cannot control the actions of other users with whom you may choose to share your information. Therefore, we cannot and do not guarantee that Content you post on the Services will not be viewed by another person. We are not responsible for circumvention of any privacy settings or security measures contained on the Services. You understand and acknowledge that, even after removal, copies of Content may remain viewable in cached and archived pages or if other users have copied or stored your Content.

Any improper collection or misuse of Content or other information accessible on the Services is a violation of VCC's Terms of Service and should be reported to [info@amilestonegroup.com](mailto:info@amilestonegroup.com).

## WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy explains how VCC collects and uses information from its users who access the Services, including VCC's treatment of personally identifiable information ('Personal Information'). **This policy does not apply to websites or practices of companies that VCC does not own or control, or to individuals that VCC does not employ or manage, including providers of third party software that may be offered on VCC's Services ('Third Party Services').**

## HOW IS PERSONAL INFORMATION ABOUT CHILDREN UNDER 13 TREATED?

We only collect personal information from children under 13 where that child's Organization (as defined in the Terms of Service <https://amilestonegroup.com/terms-of-service-canada/>) has contracted with VCC to collect personal information from children under the age of 13 for the use and benefit of the learning environment. A common example of personal information collected by VCC from a child under 13 years of age is the portrait photo of the child. VCC requires Organizations to notify the parents of children under 13 of the Organization's plans to use the PYB System before collecting any such personal information. In the event that we learn that we have collected personal information from a child under 13 improperly, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us with personal information beyond what is requested by us, or that such child's applicable Organization has not provided notice to the parents of their child's use of the System, please contact us at [info@amilestonegroup.com](mailto:info@amilestonegroup.com).

Parents should understand that our Services give our users the option to create personalized, custom versions of their yearbooks. For example, these customization features (which are optional) allow our users to upload their own content (such as photos, documents and text) and have that content included in a separate section in their final digital or printed yearbook. Any custom content that you add to your personalized, custom yearbook is only visible within the account that uploaded the custom content, and not to other users of the Services. Children under 13 should not use these customization features without adult supervision. VCC does not have control over the type of information that users may submit to the Service via such customization features. If you or your child does submit information (including personal information) to us through these customization features, you agree that we may use such information (including personal information) as reasonably necessary to provide you and your child with your personalized custom yearbook. As noted above, if you believe that a child under 13 may have provided us personal information beyond what is requested by us, or that such child is inappropriately accessing the PYB System, please contact us at [info@amilestonegroup.com](mailto:info@amilestonegroup.com).

Hereinafter, references to 'Personal Information' shall apply to personal information of individual users who are not students or children registrants under age 13. References to 'Children's Personal Information' shall only apply to personal

information of students or other children users of the Services who are under 13. 'General references to 'information' shall apply to all users.

### **WHAT INFORMATION DOES VCC DISPLAY OR COLLECT?**

This policy is designed to comply with Canadian Federal, and Provincial Privacy Policies including Alberta's Personal Information Protection Act.

When you use the Services, you may set up your personal profile, customize your yearbook entry, upload photos, send messages, perform searches and queries, and transmit information through various channels, depending on the category of user ('User Category') you are, and as permitted by the functionality of the Services. In most cases, we retain such information so that, for instance, you can personalize and improve our service or to allow you to return to view prior content you have uploaded or messages you have sent, or easily see your yearbook profile. When you update information, we usually keep a backup copy of the prior version for a reasonable period of time to enable reversion to the prior version of that information. In addition to the foregoing, we collect the following types of information from our users:

#### **Information You Provide to Us:**

We receive and store any information you enter on the Services, whether via computer, mobile phone, other wireless device, or that you provide to us in any other way (including, without limitation, any information that you provide to your Organization for the purpose of allowing your Organization to use the Services). This information may include, without limitation, Personal Information or Children's Personal Information such as your name (first and last), yearbook photograph(s), grade level and teacher name (if applicable), username, email address, phone number, photograph, Organization affiliation and location, billing and payment information, other Organization-specific information, and any other information necessary for us to provide our services (provided, however, that the only Children's Personal Information we request from minor children is limited to the child's yearbook photograph(s), name (first and last), grade level and teacher name (if applicable), user name, Organization affiliation, location and contact information). In addition, as described above, our Services include optional features which allow you to upload your own content (such as photos, documents or text) to create a custom, personalized version of your yearbook. If you include any Personal Information or Children's Personal Information in the custom content that you upload in connection with these optional services, then that Personal Information or Children's Personal Information will be treated in accordance with this policy. As noted above, any custom content that you add to your personalized, custom yearbook is only visible within the account that uploaded the custom content, and not to other users of the Services.

If you are a teacher, yearbook advisor, or other Organization administrator, we will collect your contact information in order to enable children and parents to contact you in the event that they require you to provide any access codes for access to protected areas of the Services. You may choose not to provide us with certain information, but then you may not be able to take advantage of some of our features. The Personal Information you provide is used for such purposes as responding to your requests for certain information, products and services, customizing the content you see, and communicating with you about specials and new features. The Children's Personal Information you provide shall only be used for creating your individual account (which will identify you within the user group(s) within your Organization for which you have been granted an access code ('Limited-access User Group')), customizing the content you see, for sending you notifications via the Services from your Organization or from VCC ('Notifications'), and for generating your entry(ies) and page(s) in your Organization's yearbook. With the exception of Custom Content, information and content that you provide via the Services (including Personal Information and Children's Personal Information) will generally be visible to other users of the Services who have been granted access to your Organization's Limited-access User Group. You may modify or remove your Personal Information or Children's Personal Information identified below at any time by logging into your account and accessing features to edit your profile and/or account information.

#### **Information Collected Automatically:**

We receive and store certain types of information whenever you interact with the Services or our services. VCC automatically receives and records information on our server logs from your browser, including your IP address, VCC cookie information, and the page you requested. We also record the details of your activity on the Services. This information is not

Personal Information or Children's Personal Information, and we may share it with our partners in a non-personally-identifiable manner.

Generally, our service automatically collects usage information, such as the number and frequency of visitors to our site and its components. VCC only uses this data in aggregate form, that is, as a statistical measure, and not in a manner that would identify you personally. This type of aggregate data enables us to figure out how often users use parts of the Services so that we can make the Services appealing and relevant to as many users as possible, and improve those services. As part of this use of information, we may provide aggregate information to our partners about how our users, collectively, use our site. We share this type of statistical data so that our partners also understand how often people use our partners' services and the Services to help provide you with an optimal online experience.

#### **Email Communications:**

Once you complete and submit your registration, you will begin receiving email communication from us, such as yearbook newsletters, and order and shipping confirmation emails. After you have received an email from VCC, we may receive a confirmation when you open it if your computer supports this type of program. VCC uses this confirmation to help us make emails more

interesting, relevant, and helpful. To opt out of receiving emails from us, please contact us at [info@amilestonegroup.com](mailto:info@amilestonegroup.com).

#### **WHAT ABOUT COOKIES?**

Cookies are alphanumeric identifiers that we transfer to your computer or mobile device to enable our systems to recognize your computer or device and tell us how and when pages in our site are visited and by how many people. VCC cookies do not collect Personal Information or Children's Personal Information, and we do not combine the general information collected through cookies with other Personal Information or Children's Personal Information to tell us who you are or what your screen name or email address is.

Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. We strongly recommend that you leave the cookies activated, however, because you will not be able to log in or use many of the Services' most attractive features without cookies enabled.

#### **Third Party Cookies:**

Our partners, affiliates, and service providers may also transmit cookies to your computer or device, to help provide you with an optimal online experience. For example, if you are playing a game offered by a Third Party Software Publisher, that Publisher may transmit cookies to you, allowing you to save your game history. The use of cookies by these third parties is not covered by our privacy statement and we do not have access or control over such cookies.

#### **Web Beacons:**

The Services may contain electronic images known as Web beacons (sometimes called single-pixel gifs) and are used along with cookies to compile aggregated statistics to analyze how the Services are used. They may also be used in some of our emails to let us know which emails (and which links within those emails) have been opened by recipients. This allows us to gauge the effectiveness of our customer communications and marketing campaigns.

#### **WILL VCC SHARE ANY OF THE PERSONAL INFORMATION OR CHILDREN'S PERSONAL INFORMATION IT RECEIVES?**

Personal Information and Children's Personal Information about our users is an integral part of our business. We neither rent nor sell your Personal Information or Children's Personal Information to anyone. However, we share your Personal Information and Children's Personal Information in personally identifiable form as described below. Beyond what is described below, VCC does not and has no right to provide your Personal Information and Children's Personal Information to anyone else.

**Businesses and Organizations We Do Not Control:** In certain very limited situations, businesses or organizations associated, but not under contract with VCC, may require a limited amount of your Personal information, such as a shipping company needing your shipping address to deliver a yearbook, or a government entity needing an ID number to process taxes or confirm tax status. In our relationship with these third parties, we provide only what is necessary to perform their task and take all reasonable measures to ensure that the third party respects your privacy rights in the same manner as VCC does.

**Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Examples include companies that send email, analyze data, process payment, and provide customer service tools. Unless we tell you differently, VCC's agents do not have any right to use Personal Information or Children's Personal Information we share with them beyond what is necessary to assist us in fulfilling your request via the Service.

**User Profiles Displayed:** If your User Category allows it, you may choose to populate your user profile on the Services with Personal Information or Children's Personal Information, including, without limitation, your name, photograph, email, and Organization name. This user profile information will be displayed in your Organization's yearbook, and will be displayed to other members of that yearbook team to facilitate user interaction within the Services or facilitate interaction with VCC. Also, as noted above, any custom content that you add to your personalized, custom yearbook is only visible within the account that uploaded the custom content, and not to other users of the Services.

**Communication About the Services or in Response to User Requests:** As part of the Services, you may receive from VCC (depending on your User Category) email or other types of communication relating to your use of the Services or your user profile. You acknowledge and agree that by posting information on the Services or otherwise using the Services, VCC may send you email, contact you or engage in other communication that they determine relate to your profile or use of the Services. Such communication may include a response to a service inquiry or a notification that your yearbook has shipping and will arrive on a certain date.

**Business Transfers:** In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the business assets that are transferred. Moreover, if VCC, or substantially all of its assets were acquired, or in the unlikely event that VCC goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. The Terms of Service and Privacy Policy would accompany such a transfer. You acknowledge that such transfers may occur so long as any acquirer of VCC commits to use your Personal Information and Children's Personal Information as set forth in this policy.

**Protection of VCC and Others:** We may release Personal Information or Children's Personal Information when we believe in good faith that release is necessary to comply with the law (such as to comply with a subpoena); enforce or apply our Terms of Service and other agreements; or protect the rights, property, or safety of VCC, our employees, our users, or others. This includes, without limitation, exchanging information with other companies and organizations for fraud protection.

**With Your Consent:** Except for sharing as set forth above (to which you hereby consent), VCC will not share your Personal Information or Children's Personal Information with anyone without your express written consent.

## **IS INFORMATION ABOUT ME SECURE?**

Your VCC account Personal Information or Children's Personal Information is protected by a password for your privacy and security. You may help protect against unauthorized access to your account and Personal Information or Children's Personal Information by selecting and protecting your password appropriately and limiting access to your computer and browser by signing off after you have finished accessing your account. When you enter sensitive information (such as a credit card number) in our Credit purchasing process, we encrypt the transmission of that information using secure socket layer technology (SSL). VCC endeavors to protect user information to ensure that user account information is kept private. VCC, however, cannot guarantee the security of user account information. Despite VCC best efforts, unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. For additional information about the security measures VCC uses in connection with the Services, please contact us at

info@amilestonegroup.com.

The Services may contain links to other sites. VCC is not responsible for the privacy policies and/or practices on other sites. When linking to another site a user should read the privacy policy stated on that site. This Privacy Policy only governs information collected on the Services.

Please be aware that whenever you voluntarily post information to public areas on the Services or any other public forums, such as our Facebook page, such information can be accessed by the public. To request removal of your Personal Information or Children's Personal Information from our public forums, contact us at info@amilestonegroup.com. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to do so and why.

### **WHAT INFORMATION CAN I ACCESS?**

VCC allows you to access the following information about you for the purpose of viewing, and in certain situations, updating or deleting that information. This list may change as the Services change.

You may currently access the following information, if your User Category allows you to input any of the following:

1. information in your user profile,
2. user preferences, and
3. photographs and content in your account.

If you would like to request that Children's Personal Information regarding your child be updated or deleted, or if you'd like to refuse further contact of your child (or, if you are an Organization representative, a child that is in your Organization) by the Services, please contact us at info@amilestonegroup.com. We will respond to requests made pursuant to this section within 30 days of our receipt thereof.

### **WHAT OTHER CHOICES DO I HAVE?**

As stated previously, you can always opt not to disclose information, even though it may be needed to take advantage of certain VCC features. You are able to add or update certain information, such as those listed in the 'What Information Can I Access' section above. Certain types of communication you send to other users may not be able to be removed, such as messages. We will retain your Personal Information or Children's Personal Information for as long as your account is active or as long as needed to provide you the Services; we also may retain and use your information as necessary to comply with our legal obligations, resolve disputes, and to enforce our agreements. You may request deletion of your VCC account by emailing info@amilestonegroup.com.

We may use any aggregated data derived from or incorporating your Personal Information after you delete your information, but not in a manner that would identify you personally.

If you do not wish to receive email or other communications or notifications from us, please email us at info@amilestonegroup.com.

Please note that if you do not want to receive legal notices from us, such as this Privacy Policy, those legal notices will still govern your use of the Services, and you are responsible for reviewing such legal notices for changes

### **DATA DELETION POLICY**

Six months after a yearbook project is locked, we delete all photos (and associated data) uploaded to the project that are not used in the locked project. Thereafter, we only retain the data necessary to allow the adviser to edit the ordered project and/or reorder copies of that project.

When a user deletes a project we retain the data associated with that project for six months to allow for recovery of accidental deletions. Data in a deleted project that is also included in another project will not be deleted.

Furthermore, we adhere to the principles of data avoidance and data economy. Therefore, we only store the personally identifiable data that is necessary to achieve the purposes for which it is provided or as provided for by law. After the expiration of these deadlines, the corresponding data will be blocked or deleted.

With respect to deleting a project, 30 days after a written request to delete a project or delete all or a portion of the photos from the project received from an authorized individual at a school or client, Company will delete such photos and associated data.

With respect to deleting a user's account, 30 days after a written request to delete an account, Company will delete all personal data including shipping, email and credit card information from the system.

### **BIOGRAPHICAL INFORMATION**

Other than what is collected to produce the yearbook project, we don't collect or store biographical data, such as age, race and gender. We do not use face recognition in the context of our yearbook program.

### **CHANGES TO THIS PRIVACY POLICY**

VCC may make changes to this Privacy Policy from time to time for any reason. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we use Personal Information or Children's Personal Information, we will notify you via email or by posting an announcement on the Services upon the change becoming effective. Users are bound by any changes to the Privacy Policy when he or she uses the Services after such changes have been first posted.

### **QUESTIONS OR CONCERNS**

If you have any questions or concerns regarding privacy as it relates to VCC, please send us a detailed message to [info@amilestonegroup.com](mailto:info@amilestonegroup.com). We will make every effort to resolve your concerns.

Effective date: August 1, 2019