

## Privacy Policy

This is the privacy policy (“**Policy**”) of TRADE STREET DIGEST, its subsidiaries and affiliates (collectively, “**TRADE STREET DIGEST**”). TRADE STREET DIGEST is committed to protecting your right to privacy when you provide us with personal information. This Policy sets out how we collect and manage personal information, whether that information is collected via our website, tradestreetdigest.com (the “**Site**”). In this Policy, the terms “you”, “user” and “your” refer to a visitor of our Site or user of our services provided on the Site (“**Services**”) and the terms “we”, “us” and “our” refer to TRADE STREET DIGEST.

Please read this Policy carefully before using our Site. We may also update or modify this Policy at any time by posting our revised policy to our Site. We include an “effective date” in the Policy displayed on our Site. We strongly encourage you to refer back to the Policy periodically to ensure that you stay up to date with our practices and procedures.

By using any of our Site, you agree that you have read, understood and agree to be bound by this Policy, including any updates to the Policy, and approve of the collection and use by us of your personal information according to its terms.

By submitting personal information to us or by otherwise using any of our Services or our Site, you hereby consent to the collection, use and disclosure of your personal information in accordance with this Policy.

If you do not agree with some or all of this Policy, please do not use the Site or order our Services.

### 1. Collection of Personal Information

In the course of providing Services through our Site and off-line, we may collect your personal information.

“Personal information” means information that can identify an individual, and includes, for example, a person’s name, home address, home phone number, gender, date of birth, language preference, email address, credit card information, bank account information, or account information. Personal information in Canada does not include information to enable an individual at a place of business to be contacted, such as their name, position name or title, business telephone number, business address, or business email address.

We will only collect personal information as permitted under the applicable federal and provincial privacy legislation. We may collect information in a variety of ways, including where you:

- submit an application to use portions of our Site and, where the option is available, create an account;
- place an order for any of our products;
- request us to provide you information about our company and promotional offers;
- submit an employment application to us;
- send us an email inquiry either through our Site or directly to our email;
- use our chatbot;

- contact us by telephone; and
- provide feedback in an online survey.

By submitting information to us, you consent to us collecting your information.

We may also collect aggregate information which tells us about visitors to our Site, but not the identity of those visitors. For example, we may collect information about the date, time and duration of visits and which pages of our Site are most commonly accessed. The purpose of collecting this aggregate information is to help us administer and improve our Site. Data collected through our Site on an anonymous and aggregated basis helps us measure interest in and use of our Site. We reserve the right to provide our analyses based on such anonymous and aggregated data to third parties.

The Site also uses Google Analytics to gather information about users' usage of the Site. We utilize this information to make educated metric-based decisions to improve the user experience of the Site. You can opt out of Google Analytics tracking by installing the [Google Analytics Opt-Out Browser Add-on](#).

## **2. How We May Use Your Information**

Personal information collected by us is used only for the purposes described in this Policy, or for other purposes which are disclosed to you and to which you consent.

We generally use your personal information to:

- create and secure your registered user account;
- identify you as a registered user in our system;
- communicate with you about our Site, products and Services;
- process orders that you submit to purchase our products;
- provide us with information in order to improve our Site, products and Services and to develop new products and Services;
- request feedback through an online survey;
- investigate security breaches, or cooperate with government authorities pursuant to a legal matter;
- fulfill your requests;
- send to you newsletters, surveys, offers and promotional materials related to our Site, products and Services and for our other marketing purposes;
- monitor traffic on our Site;
- determine the future direction of our Site, including technical upgrades;
- protect, investigate and prevent potentially fraudulent, unauthorized or illegal activities;
- protect our rights and the rights of other registered users;
- aggregate and anonymize personal information; and
- otherwise manage our relationship with you.

## **3. How We Share Your Personal Information**

We may disclose or share your personal information in the following circumstances:

- protecting our rights and property, including for security breach, loss or fraud prevention, investigation or mitigation purposes;

- protecting the safety of a person or a group of persons;
- with third party service providers and partners that help us to provide our Site, products and Services, including website hosting, data warehousing, data analysis, event logging, information technology, customer service, payment processing, user analytics and email delivery and messaging;
- with a third party, in the event of a change in ownership of all or a part of us through some form of merger, purchase, sale, lease or amalgamation or other form of business combination, provided that the parties are bound by appropriate agreements or obligations which require them to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Policy, unless you indicate otherwise;
- other purposes identified when the personal information is collected, or as permitted or required by law;
- with any third party, where you have provided your consent for such disclosure or where disclosure is required or permitted by law; and
- other purposes, some of which have been identified in other sections of this Policy.

#### **4. Links**

Our Site may contain links to the websites of other organizations which may be of interest to you. Similarly, you may be directed to the websites of other organizations to perform certain functions provided on our Site. Linked websites are operated by third parties who are responsible for their own privacy practices and you should check those websites for their respective privacy policies.

Articles on the Site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website. TRADE STREET DIGEST is not responsible for these websites.

#### **5. Consent**

It is important to us that we collect, use or disclose your personal information only where we have your consent to do so or as provided in this Policy. Depending on the sensitivity of the personal information, your consent may be express, implied or deemed. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. Deemed consent is consent we assume in the event that you do not exercise an opt-out mechanism offered to you.

By submitting your personal information to us, you consent to the collection, use and disclosure of your personal information in the manner described in this Policy. To the extent that we are required by applicable laws to obtain your explicit consent for the collection, use or disclosure of your personal information in accordance with this Policy, such consent will be requested at the appropriate time. Further, if we plan to use or disclose your personal information for a purpose not previously identified (either in this Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure. However, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting the office of our Privacy Officer using the contact information set out below. In some circumstances, a change or withdrawal of consent may limit our ability to provide products or Services to you or your ability to access certain areas of our Site.

We assume, unless you advise us otherwise, that by receiving a copy of this Policy or by continuing to deal with us, you have consented to the collection, use and disclosure of your personal information as explained in this Policy.

## **6. Security**

We use reasonable and appropriate measures, including encryption software, designed to help you secure your personal information against accidental or unlawful loss, access or disclosure. Only staff and service providers who have a legitimate business purpose for accessing the personal information collected by us are authorized to do so. Unauthorized use of personal information by anyone affiliated with TRADE STREET DIGEST is prohibited and constitutes grounds for disciplinary action.

Unfortunately, no data transmission over the Internet can be guaranteed as completely secure. While we strive to protect such information, we cannot ensure or warrant the security of any information transmitted to us and you do so at your own risk.

Personal information collected by TRADE STREET DIGEST may be stored and processed in another country and by using the Site, you consent to any such transfer of information outside of Canada. We will use reasonable measures to ensure all personal information is protected, but cannot ensure that the laws of other countries will offer the same level of protection as Canadian laws. By submitting your personal information to us, you hereby consent to the transmission, processing and/or storage of personal information outside of Canada.

## **7. Cookies and Similar Technologies**

In order to improve our Site on an ongoing basis, we use cookies to track your visit. The Site also uses cookies to provide users with certain features and preference settings.

A cookie is a small amount of data that is transferred to your browser by a web server and can only be read by the website that gave it to you. It functions as your identification card. It is not a program and cannot be executed as code or deliver viruses.

Cookies can also customize the site to your particular interests or store your personal information – like passwords or user IDs. If a site ever greets you with your name, chances are it's using a cookie to do so.

Most browsers are initially set to accept cookies. You can set your browser to notify you when you receive a cookie – this gives you the chance to decide whether to accept it. To learn more about cookies and how to change your settings, please use the help function in your browser. The alerts will be quite frequent, however, and may eventually become annoying.

You can use the Site without cookies, but you may have to re-enter information each time you visit. When you visit our Site, Google Analytics adds a cookie to distinguish you from other users

and track your behaviour across our Site. We use this information to improve the user experience of the Site. The cookie lasts for up to 2 years. You can read about this more in the [Google Analytics Privacy Policy](#).

With your permission, the Site utilizes the Conversion Tracking Pixel service of Facebook Inc (“Facebook”). This tool allows us to follow the actions of users after they are redirected to a provider's website by clicking on a Facebook advertisement. We are thus able to record the efficacy of Facebook advertisements for statistical and market research purposes. The collected data remains anonymous. This means we cannot see the personal data of any individual user.

However, the collected data is saved and processed by Facebook. Facebook is able to connect the data with your Facebook account and use the data for their own advertising purposes, in accordance with Facebook's Data Use Policy found under:

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

Facebook Conversion Tracking also allows Facebook and its partners to show you advertisements on and outside of Facebook. In addition, a cookie will be saved to your computer for these purposes.

Please click here if you would like to revoke your permission:

[https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/)

Similarly, we may also collect information regarding the type of device, your operating system, the browser you use, your internet service provider, your domain name, your internet protocol (IP) address, the date and time that you accessed our service, the website that referred you to one of our Site, the web pages you requested and the subject of the ads you click or scroll over, and use such information to evaluate service performance and service quality and to optimize the user's experience of our Site. To collect this information, we use cookies, web beacons and similar technologies.

## **8. Direct Marketing**

We are committed to complying with Canada's Anti-Spam Legislation. Where we have your consent or it is lawful to do so, we may provide you with direct marketing communications about our products and Services which may be of interest to you. Such information may be sent to you by post, email, telephone or SMS.

If you have consented to receiving marketing materials from us, you can withdraw your consent to receiving those communications at any time by:

- using the “unsubscribe” mechanism in our emails;
- if you have created an account on one of our Site, logging into your account and changing your contact preferences; or
- contacting our Privacy Officer using the contact information provided below.

However, we reserve the right to send you transactional or informational emails such as customer service communications in connection with the products and Services you have purchased or changes to our Site, your account or our policies.

## **9. Access to and Corrections of Your Information**

You have the right to know what personal information we have about you and to correct any inaccuracies. If a Site allows you to create an account, your personal information is available when you log in to your account and you may correct this information at any time. Otherwise, please direct any such requests by email to [editor@tradestreetdigest.com](mailto:editor@tradestreetdigest.com).

## **10. Data Retention**

We may retain your personal information as long as is necessary in order to manage our relationship with you (or fulfill the purposes for which it was collected) or as otherwise permitted by law. We will destroy personal information when it is no longer required for the purposes for which it was collected or as required by applicable law.

## **Children's Privacy**

Our Site is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Site. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Site or on or through any of its features/register on the Site, make any purchases through the Site, use any of the interactive or public comment features of this Site, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [editor@tradestreetdigest.com](mailto:editor@tradestreetdigest.com).

## **11. Contacting Us**

If you have any questions or comments about this Policy, your information, our third-party disclosure practices or your consent choices, please contact us at [editor@tradestreetdigest.com](mailto:editor@tradestreetdigest.com).

This policy is effective as of August 25, 2023 and was last updated on August 25, 2023.