

#### PRIVACY POLICY

# LAST UPDATE OF THIS PRIVACY POLICY - 3-Jun-2020

# BEFORE USING OUR SITES, PLEASE READ THIS PRIVACY POLICY CAREFULLY.

This Privacy Policy is applicable to Quality Cheese Inc. ("Company") and sets out our policy on the gathering and use of information on this site and our other sites (collectively "Sites"). The Company is committed to providing safe web sites for visitors of all ages and has implemented this Privacy Policy to demonstrate our firm commitment to maintaining the security, confidentiality and privacy of your personal information. The Company complies with Canadian Federal and Provincial privacy laws and regulations including the Personal Information and Electronic Documents Act.

There may be links from our Sites to other web sites; note that this Privacy Policy applies only to our Sites and not to web sites of other companies or organizations to which our Sites may be linked. You must check on any linked sites for the privacy policy that applies to that site and/or make any necessary inquiries in respect of that privacy policy with the operator of the linked site. These links to third party websites are provided as a convenience and are for informational purposes only. The Company does not endorse, and is not responsible for, these linked third-party websites.

Although you are not required to register to access our Sites, you may be asked to provide us with personal information when you visit certain sections of our Sites. Your use of our Sites signifies your acknowledgement and consent to our Privacy Policy. If you do not agree to this Privacy Policy, please do not continue to use our Sites. Your continued use of the Sites signifies your acceptance of these terms and any changes in effect at the time of use.

# COLLECTION OF PERSONAL INFORMATION

Personal Information is information about you that identifies you as an individual, for example, your name, address, e-mail address, or telephone number.

We collect information that you voluntarily provide to us through responses to surveys, search functions, questionnaires, feedback, Tell Your Story forms and the like. On some of our Sites, we offer health assessment tools that ask you to provide self-assessment information. We may also ask you to provide additional information such as your e-mail address if you want to obtain additional services, information, participate in a contest or to resolve complaints or concerns.

In addition, we or our service providers that help us maintain and operate our Sites may also automatically collect the following information relating to your access to and use of our website through cookies, web beacons, and other technologies: your domain name; your browser type and operating system; your type of computer; pages you view; links you click; your IP address; the length of time you visit or use our site; and the referring URL, or the webpage that led you to our site.

We may use various technological methods to track the patterns of users accessing and using our website, including the following methods:

**Cookies:** Cookies are small pieces of information that are stored by your browser on your computer or mobile device. We use cookies to enhance your experience on our Sites. Cookies in themselves do not identify an individual user, just the computer or device used. Users may have the opportunity to set their computers or devices to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. If you set your browser not to accept cookies, you may not be able to take advantage of the full features of our Sites.

**Web Beacons:** Web beacons are small pieces of data that are embedded in images on the pages of websites. We may use these technical methods to analyze the traffic patterns on our site, such as the frequency with which our users visit various parts of our site. These technical methods may involve the transmission of information either directly to us or to another party authorized by us to collect information on our behalf. We may also use these technical methods in HTML e-mails that we send to determine whether you have opened those e-mails or clicked on links in the e-mails. The information from use of these technical methods may be collected in a form that is not personally identifying.

**Third-Party Analytics:** We may use automated devices, such as Google Analytics, to evaluate usage of our Sites. We also may use other analytic means to evaluate our services. We use these tools to help us improve our services, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. You may opt-out of Google Analytics by downloading and installing the Google Analytics Opt-Out Add-on for your web browser.

Click Stream Data: When you use, read, browse or download information from our Sites, we or our service providers may also collect information such as the date, time and duration of a visit, information about your location, the pages accessed, the IP address of your computer, and any information downloaded.







**Third-Party Ad Networks:** We may use third parties such as network advertisers to serve advertisements on our Sites and on third-party websites or other media (e.g., social networking platforms). This lets us and these third parties to target advertisements to you for products and services in which you might be interested. Third-party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this one. We may provide these third-party advertisers with information, including Personal Information, about you.

Users may opt out of many third-party ad networks. For example, you may go to the Digital Advertising Alliance of Canada ("DAA Canada") Consumer Choice Page for information about opting out of interest-based advertising and their choices regarding having information used by DAA Canada companies. You may also go to the Network Advertising Initiative ("NAI") Consumer Opt-Out Page for information about opting out of interest-based advertising and their choices regarding having information used by NAI members.

Opting out from one or more companies listed on the DAA Canada Consumer Choice Page or the NAI Consumer Opt-Out Page will opt you out from those companies' delivery of interest-based content or ads to you, but it does not mean you will no longer receive any advertising through our Sites or on other websites. You may continue to receive advertisements, for example, based on the particular website that you are viewing (i.e., contextually based ads). Also, if your browsers are configured to reject cookies when you opt out on the DAA Canada or NAI websites, your opt out may not be effective. Additional information is available on the DAA Canada's website at http://youradchoices.ca/ or the NAI's website at www.networkadvertising.org.

Third-Party Content (e.g., social media links): Some of the content on our Sites may include applications made available by third parties, which could include social media buttons or links that allow you to share content or links to our Sites through the relevant third-party platforms. These third-party applications themselves may facilitate the collection of information by those third parties, through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third-party websites to understand their privacy practices and options they may make available to you in relation to their collection of your personal information.

#### **PURPOSES**

When collecting personal information, we will state the purpose of collection and will provide, on request, contact information for someone who can answer questions about the collection. We collect, use and disclose your personal information for the following purposes:

- to operate, maintain and improve our website and services, and to provide and administer products and services you request, and to disclose the information for any purpose related to the provision of requested products and services;
- · to authenticate your identity;
- to provide personal information to third-party suppliers of products and services (as discussed in more detail below);
- to manage or transfer our assets or liabilities, for example, in the case of an acquisition or merger, the provision of security for a credit facility or the change of a supplier of products or services;
- · to maintain accurate customer records;
- to protect us, yourself and others from fraud and error and to safeguard our business interests;
- to provide reports to credit bureaus;
- · to collect debts owed to us;
- to comply with legal and regulatory requirements; and
- to distribute to third parties including financial institutions, payment processors, lawyers, financial institutions and government licensing bodies for any of the above purposes.

The collections, uses and disclosures listed above are a reasonably necessary part of your relationship with us. We may also collect, use and disclose your personal information as follows:

 we may use your personal information to offer additional or alternate products and services to you and may add your personal information to customer lists for this purpose; and







• we may share your personal information with suppliers and third parties so that they may offer their products or services to you.

You may instruct us to refrain from using or sharing your personal information for any of the two purposes described above at any time by providing written notification to us. We acknowledge that the sharing of your personal information for any of those two purposes is at your option and we will not refuse you access to any product or service merely because you have instructed us to stop using or sharing your personal information in those ways.

When your personal information is to be used for a purpose not previously identified, we will disclose that the new purpose to you before such use, and we will seek your consent unless the use is authorized or required by law.

# 1. DISCLOSURE OF INFORMATION; SERVICE PROVIDERS

We will not share personal information we collect from you with any third party, except as indicated in this Privacy Policy or as permitted or required by law.

#### (a) Important Exceptions

We may disclose your personal information to a third party without your consent if permitted or required by applicable law. We may also disclose your personal information, in accordance with applicable law, in connection with a corporate re-organization, a merger or amalgamation with another entity, or a sale of all or a substantial portion of our assets provided that the disclosed information continues to be used solely for the purposes permitted by this privacy policy by the entity acquiring the information.

# (b) Service Providers

We may retain agents, subcontractors or service providers from time to time in relation to our business or the products or services that we provide. If we require a service provider to deal with your personal information, we will take reasonable steps to ensure that the service provider adheres to privacy procedures and will keep your personal information confidential. We will not provide more information than is necessary to the service provider and will ensure that the information is returned or destroyed once the purpose for which it was given is filled.

Our service providers may be located outside of Canada, and you acknowledge that personal information may be processed and stored in foreign jurisdictions with different (and perhaps weaker) privacy laws, and that the governments, courts or law enforcement or regulatory agencies in those jurisdictions may be able to obtain disclosure of that personal information through the laws of the foreign jurisdiction.

# 2. CONSENT

We will obtain your consent to collect, use or disclose personal information except where we are authorized or required by law to do so without consent. For example, we may collect, use or disclose personal information without your knowledge or consent where:

- the information is publicly available, as defined by statute or regulation;
- we are obtaining legal advice; or
- · we reasonably expect that obtaining consent would compromise an investigation or proceeding.

Other exceptions may apply.

Your consent can be express, implied or given through an authorized representative such as a lawyer, agent or broker.

Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify us that you do not wish your personal information collected/used/disclosed for various purposes after you have received notice of those purposes) or otherwise.

You may withdraw consent at any time, subject to legal, contractual and other restrictions, provided that you give us reasonable notice of withdrawal of consent. If you notify us that you withdraw consent, we will inform you of the likely consequences of that withdrawal of consent, which may include our inability to provide certain services for which that information is necessary.







#### 3. LIMITS ON COLLECTION OF PERSONAL INFORMATION

We will not collect personal information indiscriminately but will limit collection of personal information to that which is reasonable and necessary. We will also collect personal information as authorized by law.

# 4. LIMITS FOR USING, DISCLOSING AND RETAINING PERSONAL INFORMATION

Your personal information will only be used or disclosed for the purposes set out above and as authorized by law.

We will keep personal information used to make a decision affecting you for at least one year after using it to make the decision.

We will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for a legal or business purpose.

We will take due care when destroying personal information so as to prevent unauthorized access to the information.

# 5. PROTECTION OF CHILDREN ONLINE

The Company considers the protection of children's privacy, especially online, to be of the utmost importance. We do not knowingly collect or solicit personal information from children nor do we allow them to become registered users of, or to request information through, our Sites or help-seeking information lines.

# 6. ACCURACY

We will make a reasonable effort to ensure that personal information we are using or disclosing is accurate and complete.

If you demonstrate the inaccuracy or incompleteness of personal information, we will amend the information as required. If appropriate, we will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, we will annotate the personal information under our control with a note that the correction was requested but not made.

#### 7. SAFEGUARDING PERSONAL INFORMATION

We protect the personal information in our custody or control by making reasonable physical, organizational and electronic security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

We will take reasonable measures, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by the suppliers and agents who assist in providing services.

Note that confidentiality and security are not assured when information is transmitted through e-mail or other wireless communication.

# 8. PROVIDING ACCESS

You have a right to access your personal information held by us.

Upon written request and authentication of identity, we will provide you your personal information under our control. We will also give you information about the ways in which that information is being used and a description of the individuals and organizations to whom that information has been disclosed. We may charge you a reasonable fee for doing so.

We will make the information available within 30 days of receiving a written request or provide written notice where additional time is required to fulfil the request.

In some situations, we may not be able to provide access to certain personal information (e.g., if disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purposes of an investigation or where disclosure of the information would reveal confidential commercial information that could harm our competitive position). We may also be prevented by law from providing access to certain personal information.







If we refuse an access request, we will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

# 9. COMPLAINTS

We will, on request, provide information regarding our complaint procedure.

Any inquiries, complaints or questions regarding this Policy should be directed in writing to our Privacy Officer (contact information follows).

#### Contact Information:

Name: Gabriella Borgo

Address: 111 Jevlan Dr. Vaughan, ON L4L 8C2

Tel.: 905-265-9991 Fax: 905-265-9992

E-mail: info@qualitycheese.com

#### POLICY CHANGE:

If we alter our Privacy Policy, any changes will be posted on this page of our Sites so that you are always informed of the information we collect about you, how we use it and the circumstances under which we may disclose it.

# ACCEPTANCE OF OUR PRIVACY POLICY:

By using these Sites or interactive banner ads, you signify your acceptance of our Privacy Policy, and you adhere to the terms and conditions posted on the Site. By submitting your information, you agree that it will be governed by our Privacy Policy.



