

## PRIVACY POLICY

CAA South Central Ontario and its affiliated companies (collectively, “CAASCO”) respect the privacy of your personal information.

This Privacy Policy applies to the personal information that CAASCO collects, uses or discloses in the course of commercial activities, both online and offline.

For information on the manner in which CAA collects, uses, discloses and otherwise treats personal information relating to our travel business, please see the Privacy Policy for CAA Travel (South Central Ontario) Inc. Similarly, for information on the manner in which we collect, use, disclose and otherwise treat personal information relating to our insurance business, please see the Privacy Policy for CAA Insurance Company.

### ***What is personal information?***

Personal information means information about an identifiable individual.

### ***What personal information does CAASCO collect and use?***

If you choose to become a member of CAASCO, we may ask you to provide certain personal information, including, but not limited to:

- Full name and address (both of which must be provided)
- Home, cell and business phone numbers
- E-mail address
- Type of vehicle
- Year of birth
- Payment information
- Information about all associate members, if any, residing in the same household; and
- Information about your present or future use of the products and services we provide

If you provide CAASCO with the personal information of other members of your household, for example, to obtain an associate membership, you confirm that they consent to our collection, use and disclosure of their personal information for the purposes outlined in this policy.

Details relating specifically to information collected on our website can be found in the Internet Security & Privacy section of this document.

If you choose to enter into contests sponsored by CAASCO, we will ask you to provide personal information in order to contact you in the event that you are eligible to win any prizes being offered in a given contest. At the time you enter a contest, we may also obtain your consent to contact you with respect to products or services offered by CAA South Central Ontario.

Many of our products and services are available both to members and non-members. The personal information that we collect in providing these goods or services will vary. CAASCO and its affiliates may share your personal information with each other in accordance with this policy. CAASCO may also collect your personal information from third parties in accordance with this policy; for example, from a contracted locksmith or tow truck operator that has provided services covered by your membership or from one of the swipe & save loyalty partners in order to ensure we provide you with CAA Dollars.

Occasionally, we may send you information about new and existing services and benefits that we or our loyalty partners offer. In order to offer products and services that are relevant to you and to help us serve you better, we may review and analyze your use of CAASCO's and our loyalty partners' products and services. In addition, for the same purposes, we may also collect and analyze information from publicly available demographic data about the territory in which CAASCO operates.

CAASCO may collect and use your personal information to:

- Process, administer and manage your membership (if applicable);
- Provide requested products or services;
- Better understand your needs and the ways in which we can improve our products and services;
- Establish and maintain communication with you, including responding to your inquiries, via direct mail, email and/or telecommunications;
- Confirm eligibility for membership or receipt of a product or service;
- Process payments;
- Meet any legal, regulatory, processing or security requirement that requires use or disclosure of your personal information;
- Inform you about products and services that we offer (or that we and our loyalty partners jointly offer), which we believe may be of interest to you;
- Administer your participation in contests; and
- Conduct surveys or research for CAASCO's internal use.

## ***How does CAASCO disclose personal information?***

We will not disclose, trade, rent, sell or otherwise transfer your personal information, without your consent, except as otherwise set out herein.

Service Providers and Affiliates: CAASCO may share your personal information with our affiliates and with our suppliers of goods and services, service providers and agents which are responsible for administering or providing products and services on our behalf. For example, we may use service providers to authorize and process payments, send email or other communications, run our contests, conduct customer research or manage and analyze data. Our service providers are only given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own marketing or other purposes. Moreover, your personal information may be maintained and processed by our affiliates and service providers outside of Canada, including in the United States.

Partnerships: Although we sometimes offer products and services jointly with our loyalty partners, these partners never have access to our list of members and customers. Instead, personal contact information is transferred to a service provider specialized in contact (direct mail, email and/or telecommunications) list treatment. A strict data protection and non-disclosure agreement has been signed between CAASCO and any such service provider beforehand.

Third Party Ad-Servers: CAASCO may share your name, phone number and e-mail address with third parties such as social media platforms for targeted advertising purposes. Services such as Facebook Custom Audiences and Google Ads Custom Match allow CAASCO to reach potential customers who would benefit from our products and services. Information provided to third party ad-servers is secured at all times and only used for the purpose of displaying ads and reporting back to CAASCO on the performance of such ads. You can choose to hide ads through your socials at any time, or you can contact CAASCO to opt out of sharing your information with social media platforms altogether, by sending an email to [privacy@caasco.ca](mailto:privacy@caasco.ca) with 'opt-out' in the subject line.

Sale of Business: We may transfer your personal information as an asset in connection with any contemplated or actual sale, merger or other disposal of all or part of our business or assets, or as part of a corporate reorganization or other change in corporate control, including for the purposes of determining whether to proceed with such transaction or fulfilling any records or other reporting requirements to such parties. In such circumstances, we will ensure that any transfer of personal information is subject to reasonable data protection security protocols.

Legal: CAASCO and its Canadian, U.S. and other foreign service providers and affiliates may provide your personal information in response to a search warrant or other legally valid inquiry 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 applicable Canadian, United States or other law. We may also disclose personal information where necessary for the establishment, exercise or defence of legal claims, to investigate or prevent actual or suspected loss or harm to persons or property, or as otherwise required or permitted by law.

### ***Opting Out of Marketing Communications***

If you wish to opt out of receiving marketing communications or change your preferences, please complete an Opt-Out Form and send it back to us. In the event of email communications, you may also click the “unsubscribe” link at the bottom of each of our emails. An Opt-Out Form can be obtained directly on our website at [www.caasco.com/privacy](http://www.caasco.com/privacy), or by visiting one of our store locations or by calling our toll free number at 1-800-268-3750. **Please note that if you unsubscribe from receiving marketing communications, you may still continue to receive transactional or informational messages from us.**

### ***How will CAASCO protect my personal information?***

Only authorized CAASCO employees and agents who need your personal information will have access to it, unless access by others is authorized or permitted by this policy or by applicable law. CAASCO takes precautions in an effort to help protect your personal information against loss, theft and unauthorized access, use, alteration, duplication, destruction or disclosure. Such controls include reasonable technological, physical and organizational safeguards, depending on the sensitivity and the format of the information. If you are transmitting personal information electronically, please review the Internet Security & Privacy section of this policy.

CAASCO will destroy, erase or render anonymous personal information no longer required for the stated purposes or for a legal or legitimate business requirement.

### ***How do I access or correct my personal information, or make inquiries or submit comments to CAASCO?***

You have the right to access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. If you wish to update or request access to, or correction of, your personal information in CAASCO's

records, or to make inquiries or complaints, please contact our Chief Privacy Officer in writing at:

CAA South Central Ontario  
60 Commerce Valley Drive East  
Thornhill, Ontario L3T 7P9

Fax: (905) 771-3101

E-mail: [Privacy@caasco.ca](mailto:Privacy@caasco.ca)

Phone: 1-800-268-3750

We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records. Some information may not be accessed in certain circumstances, for example if it contains personal information of other persons or for other legal reasons.

If you have any inquiries or comments regarding this Privacy Policy or CAASCO's privacy practices, please write to or contact our Chief Privacy Officer at the same addresses listed above.

### ***Changes to this Privacy Policy***

CAASCO reserves the right to change this Privacy Policy from time to time. If this Privacy Policy changes materially, we will take reasonable measures to notify you, including posting a copy of the revision on our website at [www.caasco.com/privacy](http://www.caasco.com/privacy). Accordingly, we recommend that you review this Privacy Policy from time to time.

### ***Internet Security & Privacy***

In general, you may visit [www.caasco.com](http://www.caasco.com) without telling us who you are or actively submitting any personal information. However, we collect the IP (Internet Protocol) addresses of all visitors to our Website and other related information such as page requests, browser type, operating system and average time spent on our Website. We use this information to help us understand our Website activity, and to monitor and improve our Website. CAASCO provides a number of benefits and services via [www.caasco.com](http://www.caasco.com), many of which are exclusive to our members.

To access our services, CAASCO requires you to identify yourself. CAASCO uses “cookies” to identify you as a registered and/or returning visitor. Cookies are files sent from a website to a visitor's computer which may then be stored on your hard drive so we can recognize you when you return. CAASCO uses both session and permanent cookies. These cookies entitle members to enter member exclusive areas of the

Website and also to “welcome back” members with pre-established member exclusive privileges. This data may be used for generation of statistics and to personalize future visits or communications (via direct mail, email or telecommunications). We use cookies, pixels and pixel tracking on the pages of our Website where you are prompted to log in or that are customizable for the collection of aggregate data. If you have registered with our Website, these cookies (1) may let us know who you are, (2) may be necessary to access your account information (stored on our computers) in order to deliver products and personalized services, and (3) will provide us with information that we will use to personalize our Website in accordance with your preferences. You may set your Web browser either to notify you when you receive a cookie or to not accept certain cookies; however, without enabling cookies, you may not be able to take advantage of certain features of the Website.

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We also allow service providers and other third-party companies to collect certain information through cookies (such as time and date of website visit and subject of advertisements clicked or scrolled over) when you visit our websites. These companies may use this information to serve tailored ads on our website or other third-party websites. To learn more about online behavioral advertising or to manage your choices for this type of advertising, you can visit [www.youradchoices.ca](http://www.youradchoices.ca).

### ***When you leave our Website***

This policy discloses the privacy practices for our Website. However, our site contains links to other sites that CAASCO does not own or operate. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. Once you link to another site, you are subject to the privacy and security policies of the new site. We encourage you to read the privacy policies of all websites you visit, especially if you share any personal information. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

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This Privacy Policy was last revised **April 30, 2019**