

## **CHAMPION SHAVE CANADA INC. PRIVACY POLICY**

**EFFECTIVE DATE: October 1, 2017**

Champion Shave Canada Inc. (“Champion Shave Canada”, “we,” “us,” or “our”) values your privacy and is committed to protecting your personal information. Champion Shave Canada is an online service that delivers high quality razors and grooming supplies to its members and customers. Champion Shave Canada – Feel Like a Champion.

This Privacy Policy describes the policies and procedures of Champion Shave Canada Inc., on the collection, use and disclosure of your information on <https://www.championshave.ca/> (the “Site”) and the services, features, content, applications, and products we offer (collectively with the Site, the “Services”). We receive information about you from various sources, including: (i) if you register for the Site and the Services, through your user account on the Services (your “Account”); (ii) your use of the Services generally; and (iii) from third party websites and services. When you use the Services, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy.

### **WHAT INFORMATION DO WE COLLECT?**

The information we gather enables us to personalize, improve and continue to operate the Services. In connection with certain aspects of the Services, we may request, collect and/or display some of your Personal Information. We collect the following types of information from our users.

### **ACCOUNT INFORMATION:**

When you create an Account, you will provide information that could be Personal Information, such as your username, password and email address. You acknowledge that this information may be personal to you, and by creating an account on the Services and providing Personal Information to us, you allow others, including us, to identify you and therefore may not be anonymous. We may use your contact information to send you information about our Services, but

only rarely when we feel such information is important. You may unsubscribe from these messages through your Account settings, although we, regardless, reserve the right to contact you when we believe it is necessary, such as for account recovery purposes.

#### **FINANCIAL INFORMATION:**

We do not currently collect financial information, such as your payment method (valid credit card number, type, expiration date or other financial information); that information is collected and stored by our third party payment processing company (the "Payment Processor"), and use and storage of that information is governed by the Payment Processor's applicable terms of service and privacy policy.

#### **IP ADDRESS INFORMATION AND OTHER INFORMATION COLLECTED AUTOMATICALLY:**

1. We automatically receive and record information from your web browser when you interact with the Services, including your IP address and cookie information. This information is used for fighting spam/malware and also to facilitate collection of data concerning your interaction with the Services (e.g., what links you have clicked on).
2. Generally, the Services automatically collect usage information, such as the number and frequency of visitors to the Site. We may use this data in aggregate form, that is, as a statistical measure, but not in a manner that would identify you personally. This type of aggregate data enables us and third parties authorized by us to figure out how often individuals use parts of the Services so that we can analyze and improve them.

## **EMAIL COMMUNICATIONS:**

We may receive a confirmation when you open an email from us. We use this confirmation to improve our customer service.

## **INFORMATION COLLECTED USING COOKIES:**

1. Cookies are pieces of text that may be provided to your computer through your web browser when you access a website. Your browser stores cookies in a manner associated with each website you visit. We use cookies to enable our servers to recognize your web browser and tell us how and when you visit the Site and otherwise use the Services through the Internet.
2. Our cookies do not, by themselves, contain Personal Information, and we do not combine the general information collected through cookies with other Personal Information to tell us who you are. As noted, however, we do use cookies to identify that your web browser has accessed aspects of the Services and may associate that information with your Account if you have one.
3. 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 cookies active, because they enable you to take advantage the most attractive features of the Services
4. This Privacy Policy covers our use of cookies only and does not cover the use of cookies by third parties. We do not control when or how third parties place cookies on your computer. For example, third party websites to which a link points may set cookies on your computer.

## **AGGREGATE INFORMATION:**

We collect statistical information about how both unregistered and registered users, collectively, use the Services (“Aggregate Information”). Some of this information is derived from Personal Information. This statistical information is not Personal Information and cannot be tied back to you, your Account or your web browser.

## **HOW, AND WITH WHOM, IS MY INFORMATION SHARED?**

The Services are designed to help you share information with others. As a result, some of the information generated through the Services is shared with third parties.

## **INFORMATION ABOUT YOUR ACTIVITY ON THE SERVICES:**

Registered users may have some of the information about their activity on and through the Services associated with their Accounts. Unregistered users will not have this association, but information concerning their use of the Services (such as what pages they have visited) may be tracked anonymously through the use of cookies and stored by us.

## **IP ADDRESS INFORMATION:**

While we collect and store IP address information, that information is not made public. We do at times, however, share this information with our partners, service providers and other persons with whom we conduct business, and as otherwise specified in this Privacy Policy.

## **INFORMATION YOU ELECT TO SHARE:**

You may access other Third Party Services through the Services, for example by clicking on links to those Third Party Services from within the Site. We are not responsible for the privacy policies and/or practices of these Third Party Services, and you are responsible for reading and understanding those Third Party Services' privacy policies. This Privacy Policy only governs information collected on the Services.

## **AGGREGATE INFORMATION:**

We share Aggregate Information with our partners, service providers and other persons with whom we conduct business. We share this type of statistical data so that our partners can understand how and how often people use our Services and their services or websites, which facilitates improving both their services and how our Services interface with them. In addition, these third parties may share with us non-private, aggregated or otherwise non Personal Information about you that they have independently developed or acquired.

## **EMAIL COMMUNICATIONS WITH US:**

As part of the Services, you may occasionally receive email and other communications from us, such as communications relating to your Account. Communications relating to your Account will only be sent for purposes important to the Services, such as password recovery.

## **FINANCIAL INFORMATION:**

As stated above, we do not currently collect financial information, as that information is collected and stored by our Payment Processor. However, we may from time to time request and receive some of your financial information from

our Payment Processor for the purposes of completing transactions you have initiated through the Services, enrolling you in discount, rebate, and other programs in which you elect to participate, protecting against or identifying possible fraudulent transactions, and otherwise as needed to manage our business.

**INFORMATION SHARED WITH OUR AGENTS:**

We employ and contract with people and other entities that perform certain tasks on our behalf and who are under our control (our “Agents”). We may need to share Personal Information with our Agents in order to provide products or services to you. Unless we tell you differently, our Agents do not have any right to use Personal Information or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of Personal Information with our Agents.

**INFORMATION DISCLOSED PURSUANT TO 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 transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

**INFORMATION DISCLOSED FOR OUR PROTECTION AND THE PROTECTION OF OTHERS:**

We also reserve the right to access, read, preserve, and disclose any information as it reasonably believes is necessary to (i) satisfy any applicable law, regulation,

legal process or governmental request, (ii) enforce these Terms of Service, including investigation of potential violations hereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, (iv) respond to user support requests, or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

#### **INFORMATION WE SHARE WITH YOUR CONSENT:**

Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and will be able to prevent the sharing of this information.

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

Your Account information will be protected by a password for your privacy and security. You need to prevent unauthorized access to your Account and 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.

We seek to protect Account information to ensure that it is kept private; however, we cannot guarantee the security of any Account information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

We otherwise store all of our information, including your IP address information, using industry-standard techniques. We do not guarantee or warrant that such techniques will prevent unauthorized access to information about you that we store, Personal Information or otherwise.

## WHAT INFORMATION OF MINE CAN I ACCESS?

If you are a registered user, you can access information associated with your Account by logging into the Services. Registered and unregistered users can access and delete cookies through their web browser settings.

## HOW CAN I DELETE MY ACCOUNT?

Should you ever decide to delete your Account, you may do so by emailing [info@championshave.ca](mailto:info@championshave.ca) or by logging into your account. If you terminate your Account, any association between your Account and information we store will no longer be accessible through your Account. However, given the nature of sharing on the Services, any public activity on your Account prior to deletion will remain stored on our servers and will remain accessible to the public.

## WHAT CHOICES DO I HAVE REGARDING MY INFORMATION?

1. You can use many of the features of the Services without registering, thereby limiting the type of information that we collect.
2. You can always opt not to disclose certain information to us, even though it may be needed to take advantage of some of our features.
3. You can delete your Account. Please note that we will need to verify that you have the authority to delete the Account, and activity generated prior to deletion will remain stored by us and may be publicly accessible.

## WHAT HAPPENS WHEN THERE ARE CHANGES TO THIS PRIVACY POLICY?

We may amend this Privacy Policy from time to time. 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 collect or use information, we will notify you by posting an announcement on the Services or sending you an email. A user

is bound by any changes to the Privacy Policy when he or she uses the Services after such changes have been first posted.

#### WHAT IF I HAVE QUESTIONS OR CONCERNS?

If you have any questions or concerns regarding privacy using the Services, please send us a detailed message to [info@championshave.ca](mailto:info@championshave.ca). We will make every effort to resolve your concerns.