

## PRIVACY STATEMENT

Last Updated: [current date, 2021]

### Explore Art NL App

Business and Arts NL (“**BANL**”) is committed to protecting the privacy, confidentiality and security of your personal information when using the Explore Art NL (“**EANL**”) App (the “**App**”). This Privacy Statement (“**Privacy Statement**”) is intended to inform you about our practices relating to the collection, use and disclosure of your personal information through your use of the App and by your use of our services (“**Services**”).

By using this App and/or the Services, you agree with the terms of this Privacy Statement and are consenting to the collection, use, and disclosure of information in accordance with this Privacy Statement. Please read this Privacy Statement carefully.

### Changes to Privacy Statement

Business and Arts NL reserves the right to make changes to this Privacy Statement at any time, so please check back periodically and make note of the effective date at the top of the policy. If we make any material changes to this policy, we will post a notice within the App. Your continued use of this App or any Services after we post an updated Privacy Statement will constitute your acceptance of the new terms and their application to your use of the App or any Services.

### Accountability

Business and Arts NL is accountable for all personal information that it collects and is under its control. For the purposes of this Privacy Statement, “personal information” is information about an identifiable individual.

### What Information Do We Collect?

When you download or use the App, we may ask you to provide certain personal information. Business and Arts NL collects only personal information that is necessary to provide users with our Services (for example, information about your device or your IP address). We may also collect your email address if you ask to join our mailing list, or other identifying information about you if you tag yourself as a user of the App on social media.

In order to use all of the features of the App, you may choose to activate location tracking on your device through which you access the App. This allows us to suggest public art venues available in locations near to you, and is not used for any other purpose. You may also choose to allow us to access the mapping function on your mobile device, to provide you with directions from your location to various public art venues.

Certain information (including non-identifying information) is gathered automatically from users of our App. This includes, but is not limited to, usage information, IP addresses, and login attempts. Some of this information is collected to review in aggregate to identify errors and security problems with our App. We do not sell this information to third parties or use it to track or identify individuals.

The technologies we use for this automatic data collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your smartphone. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting you may be unable to access certain parts of our App.
- **Web beacons.** Pages of the App may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or [opened an email] and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

### **Limits for Collecting, Using, Disclosing and Keeping Personal Information**

Business and Arts NL will not use personal information for any other purpose than identified at or before the time of collection. At the time that any personal information is collected, Business and Arts NL will inform you of the purposes for which the information is being collected and will obtain express consent, unless such purposes are reasonably obvious to the user and where consent can be implied.

In most cases, personal information is used only to provide you with requested Services, such as access to the App. We may also use personal information to maintain, protect, and improve our Services and develop new Services and protect the rights or property of Business and Arts NL or its users. You can withdraw your consent at any time, but if you do so Business and Arts NL may not be able to provide you with all Services. For example, if you do not enable location tracking on your device, we may not be able to identify and recommend public art venues near your location. If you do not agree with this Privacy Statement, you are not permitted to access the App.

We do not routinely disclose personal information to any third parties except with your consent. (In certain circumstances described below, we may disclose your personal information to third parties.) Any secondary use of personal information for marketing purposes is only done with your consent and you are able to opt-out from such use.

Business and Arts NL does not sell, trade or otherwise transfer your personal information to third parties under any circumstances. Business and Arts NL may, from time to time, use service providers to perform services on its behalf but all service providers are required to comply with this policy, safeguard the personal information and

to only use the personal information to provide the contracted services. Our service providers are restricted from using or disclosing personal information transferred to them for any purpose other than the provision of services to Business and Arts NL.

There are circumstances where Business and Arts NL may disclose personal information without notice or consent, for example we may collect, use and disclose personal information to enforce our App policies or to protect Business and Arts NL's rights and intellectual property or the rights of others using our App or Services. Otherwise, Business and Arts NL will not use or disclose personal information without the knowledge or consent of the individual except as authorized by applicable law. Business and Arts NL retains personal information only as long as is necessary to provide the individual with the requested Service or requested information. In some cases, however, legal reporting or retention requirements necessitate that Business and Arts NL retain information for a specific amount of time.

### **Third Parties**

In using our Services you may access links to websites and services that are owned or operated by third parties (each, a "Third Party Service"). Any information that you provide on or to a Third Party Service or that is collected by a Third Party Service is provided directly to the owner or operator of the Third Party Service and is subject to the owner's or operator's privacy policy. We're not responsible for the content, privacy, or security practices and policies of any Third Party Service. To protect your information we recommend that you carefully review the privacy policies of all Third Party Service that you access.

### **Accuracy of and Access to Personal Information Collected**

You may access your personal information held by Business and Arts NL (subject to limited lawful exceptions), and you may request that the information be corrected if it is inaccurate or incomplete.

On written request, you may view or edit your personal information as collected by Business and Arts NL. Business and Arts NL will inform you of what personal information it has about you, what it is being used for and a general account of its use. To make a request, please send a letter, email or fax addressed to our Privacy Officer at the address indicated below. In any written request, please include the following information: name, contact details, and the nature of the request, for example: view and/or edit information, inquire regarding use and/or disclosure. We may require that you provide additional information to assist in finding your personal information or to verify your identity.

### **Safeguards**

Business and Arts NL implements industry-standard safeguards to protect personal information. Given the nature of the internet, any internet communications between you and Business and Arts NL can be intercepted. While Business and Arts NL strives to

protect personal information, it cannot ensure or warrant the security of any information transmitted to it or received from it electronically.

Your personal information will only be stored and processed on servers or computers located within Canada.

Internally, access to personal information is restricted to representatives of Business and Arts NL who need access to the information in order to perform their duties, that is, to provide you with the Services you have requested.

### **Challenging Compliance**

If you have any questions or concerns about this policy or about Business and Arts NL's handling of personal information, you may address those concerns to Business and Arts NL's Privacy Officer:

Amy Henderson, Executive Director

E-mail address: [info@businessandartsnl.com](mailto:info@businessandartsnl.com)

Phone: (709) 745 1611

Fax:

Mail: Po Box 265 Stn C St. John's NL A1C 5T2

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