

# **Privacy Policy**

#### **About Check In Canada**

Check in Canada ("CIC") is a reservation network created by the Canadian Hotel and Lodging Association ("CHLA") which is made up of various provincial hotel associations across the country and the Hotel Association of Canada ("HAC"). Both CHLA and HAC are not-for-profit advocacy organizations whose mandate is to support a vibrant and prosperous accommodation sector. To assist with this goal, CIC was established to provide helpful travel planning information to consumers and to connect them directly with lodging operators across Canada.

# **CIC Policy on User Information:**

To begin, CIC cares about your privacy and we have implemented policies to protect it in compliance with Canada's *Personal Information Protection and Electronic Documents Act*. The details below outline how our team of professionals establishes and enforces these rules for your ongoing safety.

CIC does not collect any personal information from travellers on its reservation platform. Rather, CIC technology connects consumers directly with accommodation providers across Canada and any reservations that are made are done directly with those lodging operators either through their own booking engines, in person upon check in or via the telephone. No personal information collected by those respective lodging operators is ever shared with CHLA, HAC or CIC and its affiliated technology providers.

CIC does aggregate certain data about reservations traffic on its platform in order to improve our network services and to measure the effectiveness of various marketing initiatives. Some of that aggregated data is shared with our destination partners, individual lodging operators as well as with CHLA and HAC. Nevertheless, none of that data includes any information that might identify specific individuals to CIC or any third party entities.

CIC does not collect or otherwise process personal information about race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, or any other information that may be deemed to be sensitive under the European Union's General Data Protection Rights ("GDPR") legislation (collectively, "Sensitive Personal Information") in the ordinary course of our business.

# 2. CIC Policy on User Data:

As a user of the CIC platform, the only emails you will receive will be from specific lodging operators to confirm your reservations details. Those accommodation providers may alert you to changes in the status of your reservation, provide you with a receipt after your stay or ask you to voluntarily complete a short

survey regarding your overall guest experience following your trip. Some of those emails may be directed to you individually or to a group of users.

Note that we do use "cookies" which is defined as a small piece of data sent from a website and stored in a user's web browser while the user is browsing that website or using web-based software. It is not used to run viruses or programs on your computer. Cookies are custom and uniquely configured to each user. For example, if you visited a web page of ours, cookies help us to remember certain information about you which allows you to use these features in a more personalized way. Cookies main purpose is to provide convenience to you by remembering which pages you visited. It's a way to help you navigate through websites more efficiently and for you to perform or customize certain features or functions. Most web browsers accept cookies, but you may "opt-out" or decline cookies by modifying your browser settings.

# 3. CIC Policy on User Billing and Credit Card Data:

The CIC website does not process payments from consumers on our reservations network. Nevertheless, various accommodation providers listed on the CIC website may require certain credit card or billing information in order to process your reservation at their property. Any such credit card billing does not involve CIC, nor is CIC ever provided that information subsequently by the lodging providers listed on the platform.

### 4. Accuracy and Retention of Data:

We have implemented appropriate technical and organizational security measures designed to protect information on the CIC platform. We work very hard to prevent against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of processing, in accordance with applicable law. In certain instances, we may use Secure Sockets Layer encryption to provide protection. However, we cannot guarantee there will not be a breach, and we are not responsible for any breach of security or for the actions of any third parties.

Because the web is an open system, the transmission of information via the internet is not completely secure. Although we will implement reasonable measures to protect your information, we cannot guarantee the security of your data transmitted to us using the internet.

# 5. We Operate in Canada:

Our production servers and offices are situated in Canada and all of our accommodation affiliates are located in Canada. Certain aspects of your reservation information (in aggregate form) may be transferred to, stored, or processed in Canada. While the data protection, privacy, may differ from those in your country, we take many steps to protect your privacy. By using our websites, you understand and consent to the collection, storage, processing, and transfer of your information to our servers in Canada.

# 6. Notice in the Case of a Breach of Security:

If a security breach causes an unauthorized intrusion into our system that materially affects you or other people on our platform, then CIC will notify you as soon as possible.

#### 7. Access:

We will give you access to any information we hold about you within 30 days of any such request. As per GDRP legislation, users may request data portability, or to access, correct, restrict processing, amend or

delete information we hold about them by contacting us at <a href="info@checkincanada.com">info@checkincanada.com</a>. Unless it is prohibited by law, we will remove specific information from our computer servers if requested.

# 8. Changes to our Privacy Policy

We reserve the right to change this Privacy Policy from time to time by updating this posting. Please check this Privacy Policy periodically for changes. Your continued use of this site following the posting of changes to this Privacy Policy will mean you accept those changes.

# 9. Contact Us:

In summary, the privacy of our users is very important to CIC, and each and every day we continue to protect it and look for ways to improve. Please direct any questions you may have regarding this Privacy Policy to <a href="mailto:info@CheckinCanada.com">info@CheckinCanada.com</a>. If you suspect our privacy and permission policy has been abused in any way, please notify us at the abovementioned email account.