

Privacy Policy

Prepared for: Bancroft Washing

Privacy Policy

Effective: January 15, 2021

1. INTRODUCTION

- 1.1. We are committed to safeguarding the privacy of our service users.
- 1.2. This policy applies where we are acting as a data controller with respect to the personal data of our service users; in other words, where we determine the purposes and means of the processing of that personal data.
 - 1.2.1. **“Personal Data”** is any information that relates to an **identified or identifiable living individual**. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data.
- 1.3. We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4. In this policy, **“we”**, **“us”** and **“our”** refers to Bancroft Washing located at Braxton Place SW, Calgary, Canada.
- 1.5. All the personal data collected is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will take reasonable commercial effort to protect Your personal data, we cannot guarantee the complete security of Your data transmitted to the Website and therefore any transmission is at Your own risk. Once we have received Your information, we will use strict procedures and security features to try to prevent unauthorized access.

2. HOW WE WILL PROCESS AND COLLECT YOUR DATA

- 2.1. In this Section we have set out:
 - 2.1.1. the general categories of personal data that we may collect;
 - 2.1.2. In the case of personal data that we did not obtain directly from you, the source and specific categories of that data; and,
 - 2.1.3. the purposes for which we may process personal data; and the legal bases of the processing.
- 2.2. We may process your account data (**“Account Data”**). The account data may include your name, phone number, and email address. The source of the account data is you, your employer, or an alienate data service. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with

you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and service and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR refine our Service through automated data processing.

- 2.3. We may process your information included in your personal profile on our website (“**Profile Data**”). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, confidential business information, marketing targets, educational details and employment details. The Profile Data may be processed for the purposes of enabling and monitoring your use of our website and the services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.4. We may process your personal data that is provided in the course of the use of our services (“**Service Data**”). The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, service accuracy, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration and utilization of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.5. We may process information contained in any inquiry you submit to us regarding services (“**Enquiry Data**”). The Enquiry Data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for this processing is consent.
- 2.6. We may process information relating to our client relationships, including client contact information] (“**Client Relationship Data**”). The Client Relationship Data may include your name, your employer or company name, your job title or role, industry, location, marketing targets, your contact details, and information contained in communications between us and you or your employer. The source of the client relationship data is you or your employer. The Client Relationship Data may be processed for the purposes of managing our relationships with clients, communicating with clients, keeping records of those communications and our services to clients. The legal basis for this processing is consent OR our legitimate interests, namely the proper management of our client relationships.
- 2.7. We may process information contained in or relating to any communication that you send to us and any information contained in any linked e-mail accounts (“**Correspondence Data**”). The Correspondence Data may include the communication content and metadata associated with the communication. Our website will generate

the metadata associated with communications made using the website contact forms and any other automated means. The Correspondence Data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with clients OR improving our services.

- 2.8. We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or within any out-of-court procedure such as mediation or arbitration. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.9. We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 2.10. In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal or business data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.11. Please do not supply any other person's personal data to us, unless we prompt you to do so within our platform.

3. HOW WE WILL USE YOUR DATA

- 3.1. We may use the Personal Information collected by us in the following manner:
 - 3.1.1. Monitor the use of the Website for the technical administration of the Bancroft Washing website;
 - 3.1.2. Use cookies to better understand how You interact with the Website, to monitor aggregate usage by the users and web traffic routing on the Website, and to improve the Website and the Website; and
 - 3.1.3. Use Personal Information, to conduct research and for further development of our services in order to provide You with a better, more intuitive and personalized experience.

4. PROVIDING YOUR PERSONAL DATA TO OTHERS

- 4.1. We do not disclose your personal and business data to any third party other than what is stated in this Section.

- 4.2. We may disclose your personal, marketing, and business data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.3. We may disclose personal, marketing, and business data to our IT suppliers or subcontractors insofar as reasonably necessary for the services provided by Bancroft Washing The service providers we use, in addition to their privacy policy is below:
- 4.4. In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
 - 4.4.1. In case that we will be under a duty to disclose or share Your personal data with or without Your consent, and with or without notice in order to comply with any legal obligation, including without limitation a subpoena, court order, or search warrant.

5. **RETAINING AND USE OF PERSONAL DATA**

- 5.1. This Section sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2. Personal data that we process may be stored for a period of time after you no longer use our website. The personal data stored for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3. The time periods for which we retain your information depends on the type of information and the purposes for which we use it. We will keep your information for no longer than is required or permitted.
 - 5.3.1. For further clarity, we may also retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. **AMENDMENTS**

- 6.1. We may update this policy from time to time for any reason by publishing a new version on our website. **Each version will apply to information collected while it was in place.**
- 6.2. You should check this page occasionally to ensure you are happy with any changes to this policy.

7. YOUR RIGHTS

- 7.1. In this Section, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 7.2. Your principal rights under data protection law are:
 - 7.2.1. the right to access;
 - 7.2.2. the right to rectification;
 - 7.2.3. the right to erasure;
 - 7.2.4. the right to restrict processing;
 - 7.2.5. the right to object to processing;
 - 7.2.6. the right to data portability;
 - 7.2.7. the right to complain to a supervisory authority; and,
 - 7.2.8. the right to withdraw consent.
- 7.3. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply you with a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.
- 7.4. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5. In some circumstances, you have the right to the erasure of your personal data without undue delay. Those circumstances include:
 - 7.5.1. The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes, and the personal data have been unlawfully processed.
 - 7.5.2. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary:

- 7.5.2.1. For exercising the right of freedom of expression and information
 - 7.5.2.2. For compliance with a legal obligation; or,
 - 7.5.2.3. For the establishment, exercise or defence of legal claims.
- 7.6. In some circumstances, you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes) towards you. If you make such an objection, we will cease to process your personal data for this purpose. However, if this objection impedes the quality of our services for you, you understand and agree that our service effectiveness will be impeded and you may have to cease using our service.
- 7.9. You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10. To the extent that the legal basis for our processing of your personal data is:
- 7.10.1. Consent; or,
 - 7.10.2. that the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and

machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.11. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the relevant supervisory authority responsible for data protection. Specifically,

7.11.1. If you are a resident of Canada, you may file a complaint with the *Canadian Office of the Privacy Commissioner* or any other relevant Federal or Provincial body;

7.11.2. If you are a resident of the United States, you may file a complaint with the *Federal Trade Commission (FTC)* or any other relevant Federal or State body; or,

7.11.3. If you are a resident of the European Union or European Economic Area, you may do so in the EU/EEA member state of your habitual residence, your place of work or the place of the alleged infringement.

7.12. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13. You may exercise any of your rights in relation to your personal data by written notice to us.

8. WHAT ARE 'COOKIES'

8.1. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. THE 'COOKIES' WE USE

9.1. We use cookies for the following purposes:

9.1.1. **Authentication** - We use cookies to identify you when you visit our website and as you navigate our website;

9.1.2. **Status** - We use cookies to help us to determine if you are logged into our website;

9.1.3. **Personalization** - We use cookies to store information about your preferences and to personalize our website for you;

9.1.4. **Security** - We use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and protecting our website and services generally;

9.1.5. **Analysis** - We use cookies to help us to analyze the use and performance of our website and services; and,

9.1.6. **Cookie Consent** - We use cookies to store your preferences in relation to the use of cookies more generally.

10. **MANAGE YOUR COOKIES**

10.1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

10.1.1. <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

10.1.2. <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);

10.1.3. <http://www.opera.com/help/tutorials/security/cookies/> (Opera);

10.1.4. <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

10.1.5. <https://support.apple.com/kb/PH21411> (Safari); and,

10.1.6. <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

10.2. Blocking all cookies will have a negative impact upon the usability of many websites.

10.3. If you block cookies, you will not be able to use all the features on our website.

11. **COOKIE PREFERENCES**

11.1. You can manage your preferences relating to the use of cookies on our website by visiting:

11.1.1.

12. **OUR DETAILS**

12.1. This website is owned and operated by Bancroft Washing

12.2. We are a {Calgary company}.

12.3. Our registered address and principal place of business is located at:

Braxton Place SW, Calgary, Canada.

12.4. You can contact us:

12.4.1. By email, using the email address published on our website from time to time.