

SHER VANCOUVER LGBTQ FRIENDS SOCIETY

Privacy Policy

Last updated: April 2, 2023

Our Commitment to You

Sher Vancouver LGBTQ Friends Society and its affiliated companies are dedicated to providing its users with the highest level of transparency and control over the use of their data. In order for us to provide you with our services we are required to collect and process certain personal information about you and your activity.

By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of this Information. We encourage you to review the following information carefully.

Grounds for data collection

Processing of your “**Personal Data**” (meaning any information which may potentially allow your identification with reasonable means) is necessary for the performance of our contractual

obligations towards you and providing you with our services, products and the operation of our website and mobile app (the “**Website**” and “**App**” respectfully, and together the “**Services**”), to protect our legitimate interests and for compliance with legal and regulatory obligations to which we are subject.

When you use our Services, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

How do we receive data about you?

We receive your Personal Data from various sources:

1. Registration information – When you voluntarily provide us your personal details in order to create an account or register to our Services (for example, your name and email address, and in connection with events).
2. When you communicate with us – For example when you send us a message, we collect the Personal Data you provided us with.
3. Technical information – When operating our Services, we use various technological tracking tools to collect information regarding your use of the Services. Along with our partners, we may use tracking technologies such as cookies, JavaScript, beacons and Local Storage, which are used to store content information and preferences.
4. Third party information – We may receive your data from third party providers who help us with the provision and maintenance of our Services, such as social networks (for example your name and user name, when you register or log-in to our Services), traffic analytics vendors, fraud prevention agencies and others.

What type of data we collect?

Personal Data

In the course of using the Services, we may ask you to provide us with certain Personal Data to provide and improve the Services, to contact or identify you, to enable you to access certain parts of the Website, and as otherwise indicated in this Policy. We collect the following Personal Data about you:

- Identifiers:

- When you sign up for an event or to receive our newsletter, or when you submit a support ticket, we will receive certain identifiers, such as: your name, email address or other voluntary information.
- If you connect your account and log-in to our Services via to a social network (for example: if you log in via Facebook), we will also collect certain identifiers, such as your associated profile name, email address and profile photo.
- Internet or other electronic network activity information – our Services may use your IP-address and UDID and other information regarding your interaction with our Services and with advertisements displayed on our Services.
- Geolocation data – our Services may use information regarding your general location.

Non-Personal Data

We also collect data about the use of our Services and the characteristics and activities of users, in order to operate it and improve it. We may collect the following non-Personal Data:

- Technical information – this includes data such as website visits, the browser you are using and its display settings, your operating system, device type, session start/stop time, time zone, network connection type (e.g., Wi-Fi, cellular), and non-identifiable cookie information.
- Information from third parties – this includes information we receive from our business partners. This may include pseudonymous advertiser identifiers that some advertisers or other third-party ad platforms choose to share with us. This information is also used to enhance data points about a particular unique browser or device.

If we combine Personal Data with non-Personal Data, the combined data will be treated as Personal Data. Further Personal Data will only be stored and processed if you voluntarily provide it to us, e.g. through a contact form.

Tracking Technologies

When you visit or access our Services we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies. Those allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our Services, improve our Website's performance, perform analytics and customize your experience on it. In addition, we may merge information we have with information collected through these tracking technologies with information we may obtain from other sources and, as a result, such information may become Personal Data.

How do we use the data we collect?

- **Provision of service** – for the provision and improvement of our Services, including for support and to respond to your queries.
- **Service announcements** – we will use your Personal Data to communicate with you and to keep you informed of our latest updates to our Services and offer you service offers.
- **Marketing and advertising purposes** – by subscribing to our website or newsletter you will receive tips and announcements straight to your email account. We may also use your Personal Data in the following ways: we may send you promotional material concerning our Services, or our partners' services, which we believe might interest you; we may also display certain adverts on our Services, which we believe will be relevant for you. We make our best efforts to make sure you see only relevant ads and receive relevant communications from us, including but not limited to, by building an automated profile based on your Personal Data.
- Opt-out of retargeted advertising – You may object to the use of your Personal Data for advertising purposes by disabling your cookies, as described in this policy.
- Opt out of receiving marketing materials – If you do not want us to use or share your Personal Data for marketing purposes, you may opt-out in accordance with this “Opt-out” section. You may choose not to receive our promotional or marketing emails by clicking on the “unsubscribe” link in the emails that you receive from us. Please note that even if you unsubscribe from our newsletter, we may continue to send you service-related updates and notifications or reply to your queries and feedback you provide us. Also note that even if you opt-out, we may still use and share your Personal Data with third parties for *non-marketing purposes* (for example to fulfill your requests, communicate with you and respond to your inquiries, etc.). In such cases, the companies with whom we share your Personal Data are authorized to use your Personal Data only as necessary to provide these non-marketing services. If you subscribed to any of our partners' service, please note we will have no control over our partners' communications, and in order to unsubscribe from it please contact the relevant partner or use the “unsubscribe” link in its emails.
- **Analytics, surveys and research** – from time to time, we may conduct surveys or test features, and analyze the data we have to develop, evaluate and improve these features, all in order to improve our Services and think of new and exciting features for our users.
- **Protecting our interests** – we may use your Personal Data when we believe it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our Services and protect the rights and property of [INSERT OPERATING ENTITY] its users and/or partners.

- **Enforcing of policies** – we may use your Personal Data in order to enforce our policies, including but not limited to our terms.
- **Compliance with legal and regulatory requirements** – we may use your Personal Data to investigate violations, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.

With whom do we share your Personal Data?

- **Internal concerned parties** – we share your information with companies in our group, as well as our employees, in order to provide you with our Services.
- **Business partners** – we share your information with business partners, such as storage and analytics providers who help us provide you with our Services. We may also use a payment processing company to receive and process your credit card transactions for us. These third parties may have access to your Personal Data so that they may perform these tasks on our behalf, but they are obligated to comply with this Privacy Policy and may not use your Personal Data for any other purpose.
- **User Profiles and Submissions** – certain user profile information, including your name, location, and any video or image content that such user has uploaded to the Services, may be displayed to other users to facilitate user interaction within the Services or address your request for our Services. Your account privacy settings may allow you to limit the other users who can see the Personal Information in your user profile and/or what information in your user profile is visible to others. Please remember that any content you upload to your public user profile, along with any Personal Information or content that you voluntarily disclose online in a manner other users can view (on discussion boards, in messages and chat areas, etc.) becomes publicly available, and can be collected and used by anyone. Your username may also be displayed to other users if and when you send messages or comments or upload images or videos through the Services and other users can contact you through messages and comments.
- **Compliance with laws and law enforcement entities** – we cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any data about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect our or a third party's property and rights, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable. We also may be required to disclose an individual's Personal Data in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.
- **Merger and acquisitions** – we may share your data if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your data in accordance with the terms of this Privacy Policy.

- The Services are not intended for the use of minors. We have not knowingly Sold nor will we Sell the Personal Information of minors under 16 years of age without affirmative authorization.

How we protect your information

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Data. Your data is stored on secure servers and isn't publicly available. We limit access of your information only to those employees or partners on a "need to know" basis, in order to enable the carrying out of the agreement between us.

While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account. You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use. You should also be aware that there is always some risk involved in transmitting information over the internet. While we strive to protect your Personal Data, we cannot ensure or warrant the security and privacy of your Personal Data or other content you transmit using the Services, and you do so at your own risk.

Retention

We will retain your Personal Data for as long as necessary to provide our Services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client personal data, trading information, account opening documents, communications and anything else as required by applicable laws and regulations.

Your Rights

California Consumers' Rights

If you reside in California, you are granted the following rights with regard to your Personal Data:

1. Receive disclosure regarding what Personal Data concerning you is being processed, sold, and other details pertaining to it (such as its categories, sources, recipients, purpose and specific pieces of Personal Information), in the 12 months prior to the request.

2. You may also receive a copy of your Personal Data obtained by us in the 12 months prior to your request, in a readily usable format.
3. Request erasure of Personal Data we collected from you.
4. Right to not be discriminated because of the exercise of your rights under the CCPA.
5. Right to opt-out of the Sale of Personal Information, which you can exercise via our dedicated “Do Not Sell My Info” link located on our homepage.

However, please note that these rights pertain to California residents only, are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

European Users’ Rights

If you reside within the European Union, you may request to:

1. Receive confirmation as to whether or not Personal Data concerning you is being processed, and access your stored Personal Data, together with supplementary information.
2. Receive a copy of Personal Data you directly volunteer to us in a structured, commonly used and machine-readable format.
3. Request rectification of your Personal Data that is in our control.
4. Request erasure of your Personal Data.
5. Object to the processing of Personal Data by us.
6. Request to restrict processing of your Personal Data by us.
7. Lodge a complaint with a supervisory authority.

However, please note that these rights pertain to EU residents only, are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

Users outside the EU

Under certain jurisdictions, some of the aforementioned rights may apply as well. Please contact us using the contact details provided below and we would make our best efforts to assist with any questions or requests.

How to contact us?

If you wish to exercise any of the aforementioned rights, or receive more information, please contact our Data Protection Officer (“DPO”) using the details provided below. Kindly specify your country of residence, and the name of the website subject of your request.

Email: info@shervancouver.com

Please be advised that upon receiving your request, and according to legal obligations to which we are subject, we will first need to verify your request and therefore we may ask you to provide us with additional verification details, as needed. Following our verification process, we will respond to your request within the timeframe required under applicable laws.

Our Policy toward Children

We understand the importance of protecting children’s privacy, especially in an online environment. The Services are not designed for or directed at children under the age of 16 years old (“Minors”). We do not knowingly collect Personal Data from Minors. If a parent or guardian becomes aware that his or her child has provided us with Personal Data, he or she should contact us using the details provided above.

Updates to this Policy

This Privacy Policy is subject to changes from time to time, in our sole discretion. The most current version will always be posted on our website (as reflected in the “Last Updated” heading). You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our Services after any revisions become effective, you agree to be bound by the updated Privacy Policy.

Notwithstanding the forgoing, as of April 2, 2023, this Policy will be updated at least once every 12 months.