

Privacy Policy

(Last Updated on September 30, 2020)

ACPN (“**organization**” or “**we**”, “**our**” or “**us**”) values our customers, including you (“**you**”) and we respect your privacy. We only collect personal information about you with your consent. This privacy policy (the “**Policy**”) describes the kinds of personal information we collect about you, why we collect it, how we use it, how we protect it, and under what circumstances we share it with third parties. This Policy also describes the decisions you can make about your personal information. You may require us to change, amend or delete the personal information that you have provided to us at any time. If you do not agree to the terms of this Policy, please do not use the Platform (as described in the Terms of Use).

If this Policy changes in the future, we will post an updated version on our Platform. We recommend that you check this Platform periodically in order to review our current Policy. You can tell if this Policy has changed by checking the effective date that appears at the bottom of this Policy. Depending on the circumstances, we may also decide to send you a notice in other ways in our discretion, such as via email or other contact information you have provided that the Policy was changed. If you continue to use our Platform and/or Services (as defined in the Terms of Use) after the Policy changed or notice of the change has been given, you will be deemed to have accepted such changes.

By visiting our Platform, or using our Services, you are accepting and agree to comply with this Policy and you acknowledge and agree that any access or use by you is subject to our Terms of Use. Capitalized terms used here, but not defined, have the meanings provided in the Terms of Use.

Consent

By using, registering to or otherwise accessing our Services, you agree to this Policy and give your explicit consent to the collection, use and processing of your information in accordance with this Policy. As discussed below, you may withdraw your consent at any time.

Information we collect

When you use our Platform or Services, we collect the following types of information.

1. **Personal and health information:** When you sign up through our Platform to use our Services, you may need to provide certain information to us. In order to use our Platform, you may need to provide us with your name, email address, mailing address and postal code. We may also ask you for your age and other demographic-specific data to conduct internal business analyses. For your safety if you are attending one of our events, you may also need to provide us with

certain health care information, such as any relevant medical conditions, dietary restrictions and your doctor’s contact information.

2. **General usage data:** When you use our Platform, we may collect technical properties of hardware and software used in conjunction with our Platform. For example, we may collect the type and model of hardware and/or web browser you are using, referring or exit web pages, and the operating system version you are using.

When you use our Platform, we may also collect information about your interactions with the Services, such as the date and time of your access as well as how long you use our Platform in each session, features you use in our Platform, how long you use our Platform overall, which screens or pages you visit, and what you click on.

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1. **Purchase and payment information:** While payments made through our Platform are processed through a third party, we may collect information to administer, manage, and fulfill the purchases you make. For example, we may collect your name, email address, account information, what is ordered, the date and time of the order, the quantity and price of the order, whether payment was made, method of payment, purchase history, and if you re-ordered.
 2. **Location information:** When you use our Platform, we may collect your postal address and your Internet Protocol (“IP”) address.
 3. **Quality assurance and customer service:** Your customer service telephone calls and emails with us and our service providers, if any, may be recorded, logged, and/or monitored for quality assurance and customer service purposes such as to assist in addressing your inquiries, troubleshooting, training and analytics to identify trends and make improvements to our Platform, Services and customer service. As part of the recording and logging of the calls and emails, we will collect information like the identity of the caller or sender of email, the date and time of the call or email, and the subject and resolution of the issue.
 4. **Cookies:** In addition, when you visit our Platform, we collect certain information about your activity on our Platform, as described below under the heading “Our Use of Cookies and Log Files”.

How we collect information about you

We collect information about you from a variety of sources when you access our Platform and/or Services, including:

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1. directly from you (when you access and use the Platform and/or Services);
 2. from our business partners and service providers;

3. from third party sources; and
4. automatically from devices that you use to connect to our Platform and access our Services.

Using information, we collect

We use the personal information you have agreed to provide to us in order to: communicate with you for the purposes you have separately indicated when you signed up to the Platform; learn more about you and your preferences by looking at, among other things, the IP address of your computer and your activity on the Platform; and address problems with, and improve, our Platform and Services. You may update your communication preferences anytime by contacting us.

We also use the information we collect about you for promotional purposes, to solicit feedback from you, to develop new products or features, enhance the existing Platform, and to communicate with you about them using various means, for example to make available or send to you upgrades or updates, or notices of upgrades or updates of the Platform. We may also use information to conduct investigations, as may be required, including to detect fraud, abuse, security breaches and other harmful activity, to resolve disputes and enforce agreements and policies, and in order to meet and comply with legal and regulatory requirements.

Except as described in this Privacy Policy and the Terms of Use, we will not share, sell or rent your personal information in personally identifiable form with any third party, except if, and to the extent necessary, in our good faith judgment, doing so is required to: comply with laws or regulations; respond to a valid subpoena, order, or government request; establish or exercise the Organization's legal rights or defend against legal claims; investigate, detect, suppress, prevent or take action regarding illegal or prohibited activities, suspected fraud, situations involving potential threats to the reputation or physical safety of any person; or as otherwise required by law.

We will retain your personal information only for a time and to the extent necessary for the purposes for which it was collected as described in this Policy and for reasonable backup, archival, audit, or other similar purposes.

If we have disclosed your personal information to a third party in accordance with this Policy, we will ensure that it is only retained by that third party for as long as is necessary for that third party to complete the purpose for which we provided it to them.

Notwithstanding anything to the contrary contained in this Policy, we may remove personal identifiers from your information and maintain and use it in a de-identified form that may be combined with other information to generate aggregated information. Such de-identified and/or aggregated information will be deemed to be owned by us and we shall have unrestricted title, rights, and interest to the de-identified and/or aggregated information which may include, without limitation, the right to use, distribute, transmit, transfer, license, trade, rent, share, assign, and sell the de-identified and/or aggregated information. We will retain your personal

information as long as necessary for the fulfillment of the identified purposes or as otherwise necessary to comply with applicable laws.

To whom we disclose your personal information

In accordance with this Policy, we may share your personal information in the following manner to fulfill the purposes identified in this Policy and for purposes related thereto, and to provide you with access to the Platform and our Services:

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 1. if we have your consent;

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 1. within our Organization (including volunteers of the Organization);
 2. with third party services providers who help us provide certain aspects of our Platform and Services, including without limitation:
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 1. providers who facilitate payment processing (e.g. PayPal and Stripe);
 - providers who assist in event organization and communication (e.g. Salesforce; Eventbrite and Mailchimp); and
 - cloud service providers (e.g. Google Drive).

Each third party service provider has its own policies and Terms of Use and we encourage you to review such terms and policies;

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 1. with our financial, insurance, legal, accounting or other advisors that provide professional services to us;
 2. as necessary to complete any transactions while using our Platform;
 3. to respond to a subpoena, order, legal process, or government request;
 4. to protect, establish or exercise our legal rights or defend against legal claims;
 5. to investigate, detect, suppress, prevent or take action regarding illegal or prohibited activities, suspected fraud, situations involving potential threats to the reputation or physical safety of any person;
 6. as otherwise required by law; or
 - if we are to be sold, merged, or amalgamated or substantially all of our assets are to be sold or disposed of, your personal information may be transferred to a potential purchaser if, and to the extent necessary, it is required for the purposes of deciding whether to

proceed with the proposed transaction and completing it. If such a sale, merger, acquisition, or disposal is completed, we will use reasonable efforts to direct the transferee to use personal information you have provided to us in a manner that is consistent with this Policy. Following such a sale or transfer, you may contact the entity to which we transferred your personal information with any inquiries concerning the processing of that information.

Your decisions about your personal information

At any time you can contact us to: stop receiving e-mails from us; review the personal information held by the Organization in connection with your account; withdraw your consent for our use and disclosure of your information; request a list of third parties to which the Organization may have provided your personal information; close your account; and amend your personal information, where possible, or by writing to us at 107, 80 Acadia Ave Markham, ON L3R 9V1. You can always unsubscribe from receiving promotional e-mails from us by simply clicking the “unsubscribe” link provided at the bottom of every promotional Organization e-mail from us.

If you contact us to do any of the things listed above, we may require you to provide sufficient personal information to allow us to identify you and tell you about the existence, use and disclosure of your personal information and this personal information will only be used for this purpose. If you contact us about your personal information, we will respond to your request within a reasonable time and at no cost to you.

Generally, you may withdraw at any time your consent for us to collect, use, and disclose your personal information in accordance with this Policy, subject to legal or contractual restrictions and reasonable notice. As such, we may continue to collect, use, and disclose your personal information as may be required to provide you with our Platform, and to the extent that we are contractually obligated to do so or as necessary to enforce any contractual obligations you may have with us. If you refuse to provide us with the information we require or later contact us to withdraw your consent for us to use and disclose your personal information, we may no longer be able to provide you with our Platform.

Our use of cookies and log files

We use browser tracking cookies (or “**cookies**”), which are small text files that are placed on the hard disk of a computer by a Platform. Cookies are uniquely assigned to you, and can only be read by a Platform or web server that issued the cookie to you. We also use browser “log files” which record certain information when you visit a Platform, including your IP address. To improve your experience on our Platform, we use cookies and logs files to: recognize you when you return to our Platform; keep track of activity on our Platform and remember what items you have clicked on or viewed; study how you navigate through our Platform and which Platform you request in site searches so that we can improve the design, content and function of our Platform; and customize the message, content and delivery of online banner advertisements and e-mails that reflect how you navigate to and through our Platform based on your online behavior.

We call this “Browsing Data”. We may hire third-party service providers to assist us in the collection and analysis of this Browsing Data collected through cookies, but none of your personal information is disclosed to these third party service providers.

You have the ability to accept or decline our use of cookies. You can refuse cookies by turning them off or blocking them in your internet browser. If you decide to turn off or block cookies, our Platform might not function correctly.

Security

We aim to provide you with a safe experience. We have in place certain physical, electronic, technological, and organizational safeguards that are designed to protect the security and privacy of your personal information against loss, theft, and unauthorized access, disclosure, copying use or modification. Please note, however, that while we try to create a secure and reliable Platform for users, the confidentiality of any communication or material transmitted to or from the Platform or via e-mail cannot be guaranteed.

We limit access to your personal information within the Organization to individuals on a need-to-know basis.

Your personal information may be transferred, processed and retained on servers in countries outside of Canada, including the United States, and may therefore be subject to laws that do not offer the same degree of protection as Canadian law, although the Organization will ensure that contractual protections, at least equal to its own standards, are put in place with those owning or managing servers located outside Canada. While we undertake to protect your personal information when it is transferred to other jurisdictions, the laws of other jurisdictions may require the disclosure of your personal information to governmental authorities under circumstances that are different than those that apply in Canada and are contemplated under this Policy.

Links to Other Sites

We provide links on our Platform to other, third-party sites we think you will enjoy. These sites operate independently of us and have established their own privacy and security policies. Any personal information you provide on linked pages or other sites is provided directly to that third party and subject to that third party’s privacy policy. We strongly encourage you to review these policies at any site you visit. This Policy does not apply to such linked pages or other sites, and we are not responsible for the content or practices of any linked Platforms which are provided solely for your convenience.

Children’s Online Privacy Protection

The Platform and our Services may be used by people of all ages, including those under the age of thirteen (13). Organization does not knowingly collect or use any personal information from any children under the age of 13 without the consent of a child’s parent(s) or guardian(s). If we become aware that we have unknowingly collected personal information from a child under the

age of 13 without the consent of a child's parent(s) or guardian(s), we will make commercially reasonable efforts to delete such personal information from our database.

Questions or Comments

If you have any questions or comments or wish to make a complaint about this Policy, please feel free to contact us at the contact address listed below. If you contact us about your personal information, we will respond to your request within a reasonable time and at minimal cost or no cost to you in accordance with applicable laws. Depending on the circumstances and applicable laws, we may refuse to process certain access requests (for example, access requests that are unreasonably repetitive or systematic, would be extremely impractical or require disproportionate technical effort).

ACPN.

107, 80 Acadia Ave Markham, ON L3R 9V1.

Phone: [\(647\) 290-2902](tel:6472902902)

Attention: Thomas Lin

Effective Date: Sep. 30, 2020