

C2 MONTREAL (2022)

PRIVACY POLICY

LAST UPDATE: June 28, 2022

Hello there!

This Privacy Policy contains useful information on how we process your personal data, your rights regarding your data and how you can exercise your rights.

All comments, questions, concerns, requests or complaints regarding your personal data or our privacy practices should be sent to our Privacy Officer as follows:

By e-mail: **privacy@c2.biz**
By mail: **Attention:** Privacy Officer
1 Place Ville Marie, Suite 12106
Montréal, Québec, Canada
H3B 3Y1

As a participant of the Digital Advertising Alliance of Canada (“**DAAC**”), we adhere to the Principles for Online Interest-Based Advertising designed to apply consumer-friendly standards to online-based advertising across the web. This Privacy Policy contains explanations on how we conduct online-based advertising and how you can manage your cookies to maintain control over your online activities. [Click here](#) to learn how we use interest-based advertising as part of our marketing activities. [Click here](#) to obtain more information on the DAAC’s AdChoices self-regulatory program.

WHAT IS PERSONAL DATA?

In this Privacy Policy, “**personal data**” means any data which allows us to identify you directly, or indirectly, and includes cookies and similar technologies.

Cookies are small files installed on your device which help websites like ours remember things about you, such as your preferred language. Cookies can be installed by us, in which case they are first party cookies and are generally installed for the duration of a session. This means that they are deleted once you close your browser. Cookies can also be installed by third parties, such as Google Analytics, and track you across different websites to obtain aggregated data about your behavior or usage.

In this Privacy Policy, we also use the term cookie to include other similar automatic tracking technologies such as web beacons and pixels. These are typically small transparent images that provide us with information similar to the information obtained from cookies. They are often used with cookies, but are not stored on your device in the same way. Therefore, if you delete the cookies on your browser, web beacons and pixels may not be entirely deleted although their functionality will be restricted by the cookies you deleted.

WHEN DOES THIS PRIVACY POLICY APPLY?

This Privacy Policy applies to your browsing and use of our website at <https://c2montreal.com> (the “**website**”), to your purchase of tickets to attend our "C2 Montreal" events and related conferences and sessions, whether they are held digitally, in person or by combining both attendance modes, to our use of cookies and marketing activities to promote tickets to such events. This Privacy Policy applies to our communications, such as if you send us an e-mail. We will use the term “**Services**” to cover all of these activities together.

Our Services may contain links towards third party applications, services or websites. These external services are not covered by this Privacy Policy. It is your responsibility to review their respective privacy policies and practices prior to using these external services.

Please note that, with respect to virtual attendance to our event, our [C2 Agora platform's privacy policy](#) supplements this Privacy Policy and contains additional information about our data practices in the context of your access and use of this platform.

WHAT TYPE OF PERSONAL DATA DO WE COLLECT ABOUT YOU, AND FOR WHAT PURPOSES?

The information we collect generally falls into one or more of the following categories. For each category of personal data, we explain why do we collect it, and based on which applicable lawful basis if you are located in the European Union. If we process your personal data based on consent and you are located in the European Union, you also have the right to withdraw your consent at any time, however, we may not be able to provide you with the related Services.

If you are located elsewhere, we collect your personal data based on your consent, whether implicit or explicit. If you purchase tickets for someone else or otherwise subscribe someone else to attend our events, then you are responsible for ensuring that this person has consented for you to share their personal data with us.

Mailing list and other communications: we collect your e-mail address and other information (such as your first name, last name, company name, state, country and language) that you submit if you sign-up to receive updates about the Services and other communications from us on our website. We also collect the information you share with us when you exchange with us, such as through our online forms and through e-mails. We collect this information based on your consent or our legitimate interests. If you subscribe to our mailing list, you can unsubscribe directly within our communications. [Click here](#) to jump to the section of this Privacy Policy that details how you can do so. We use this information:

- to conduct marketing activities related to the sale of tickets for the Event, including interest-based advertising as described in this Privacy Policy. *Applicable legal ground(s) under GDPR; consent, legitimate interests for direct marketing.*

- to contact you relating to the Services. *Applicable ground(s) under GDPR: legitimate interests.*
- to respond to inquiries and other requests. *Applicable ground(s) under GDPR: performance of a contract, legitimate interests, consent.*
- to collect opinions and comments in regard to the Services. *Applicable ground(s) under GDPR: consent.*

Registration and ticket purchase: we collect your first name, last name, company name, e-mail address, phone number, billing address and other information that you submit when you register and purchase tickets for our events. We use this information:

- to provide you with the Services and to support your use of the Services, including providing you with credentials to create accounts, a badge to attend the Event, accreditation and communications regarding the Event. *Applicable legal ground under GDPR: consent, contract performance.*
- to allow you to purchase tickets, and to purchase other goods and services during our events. *Applicable legal ground(s) under GDPR: performance of a contract, consent.*
- to investigate legal claims or comply with our legal obligations. *Applicable ground(s) under GDPR: legal obligations, legitimate interests.*

Electronic information: we use cookies and similar tracking technologies that automatically collect information about your device, such as IP address, browser used, language used, pages visited, time spent on a page, origin of visitors, etc. [Click here](#) to jump to the section of this Privacy Policy that details how we use cookies and similar tracking technologies. We use this information:

- to monitor and improve the Services. *Applicable ground(s) under GDPR: legitimate interests.*
- to obtain analytics and performance data related to the Services. *Applicable ground(s) under GDPR: legitimate interests, consent.*

Badges: during on-site events, we may use badges in order to grant access to participants who attend in person. Our badges contain radio-frequency identification (RFID) technology that is used to scan your badges when you arrive at such events or participate in certain activities for security and credential purposes. We use this information:

- to provide you with accreditation regarding your participation at the Event. *Applicable legal ground(s) under GDPR: legitimate interests, consent.*
- to monitor and improve the Services. *Applicable ground(s) under GDPR: legitimate interests.*

- to investigate legal claims or comply with our legal obligations. *Applicable ground(s) under GDPR: legal obligations, legitimate interests.*

Pictures and images of participants: if you register for events, we may require a picture of you to print on your badge (for on-site events) or to build your profile on platforms used to host virtual online events. We process some data points on your picture for security purposes. Participants may also be filmed and photographed when attending our events based on the consent set forth in the [Ticket Purchase and Event Participation Terms of Use](#) and prominently displayed on our website. We use this information:

- to ensure the security of our Services, such as by scanning your badges for our on-site events and monitoring network traffic. *Applicable legal ground(s) under GDPR: legitimate interests, consent.*
- to provide you with accreditation regarding your participation at our events. *Applicable legal ground(s) under GDPR: legitimate interests, consent.*

Registration and contact information: we may process your first and last name, email address, preferred language, mobile number, title, company size and industry, company address, password, and other similar data when you register for the Event or create an account with us. We use this information:

- to contact you relating to the Services. *Applicable ground(s) under GDPR: legitimate interests.*
- to respond to inquiries and other requests. *Applicable ground(s) under GDPR: performance of a contract, legitimate interests, consent.*
- to provide you with accreditation regarding your participation at our events. *Applicable legal ground(s) under GDPR: legitimate interests, consent.*
- to collect opinions and comments in regard to the Services. *Applicable ground(s) under GDPR: consent.*
- to facilitate registration for future editions of our events, by automatically filling in the necessary form fields. *Applicable ground(s) under GDPR: consent, legitimate interests, performance of a contract.*

Professional information: we may process information regarding your professional status and interests, such as your company name, your title, your position type, your company size, your industry, your intention of participating in our events, your interests regarding the topics and issues to be covered or discussed during the events, etc. We also collect your Curriculum Vitae and letter of interests as well as availabilities if you apply for a job opening in our “Career” section of our website. We use this information:

- to provide networking services during our events. *Applicable legal ground(s) under GDPR: consent.*
- to provide you with the Services and to support your use of the Services, including providing you with credentials to create accounts, a badge to attend our on-site events, accreditation and communications regarding our events. *Applicable legal ground under GDPR: consent, contract performance.*
- to process your application to our job openings available on our website. *Applicable ground(s) under GDPR: consent.*

Preferences: if you subscribe as a participant for our events, we collect your preferred language of communication, meal preferences (for on-site events only), specific needs for/during events such as accessibility assistance, feedback and survey responses. We use this information:

- to monitor and improve the Services. *Applicable ground(s) under GDPR: legitimate interests.*
- to collect opinions and comments in regard to the Services. *Applicable ground(s) under GDPR: consent.*

Payment information: if you purchase tickets for our events, we process payment information, including your name, billing address, credit card numbers and expiration dates. Since all payment information is processed by our trusted third-party payment providers (such as Tito or Stripe [as described below](#)), we do not store any of your credit card or payment information, and we do not have direct access to such personal data. We use this information:

- to provide you with the Services and to support your use of the Services, including providing you with credentials to create accounts, a badge to attend our on-site events, accreditation and communications regarding our events. *Applicable legal ground under GDPR: consent, contract performance.*
- to allow you to purchase tickets, and to purchase other goods and services during our events. *Applicable legal ground(s) under GDPR: performance of a contract, consent.*

Networking and Event information: as part of the Services, we allow participants to use web and mobile applications for events and networking. Through our Agora platform, participants can select the activities that they want to attend during our events, create their schedule, create an event profile, link their LinkedIn profile, export their contacts, provide session feedbacks and interact with other participants. Through In this context, we collect information about your exchange of contact details with other participants, the activities you have registered for and your evaluation of the different sessions. We use this information:

- to provide networking services during our events (such as through conversations on Agora). *Applicable legal ground(s) under GDPR: consent.*
- to provide you with the Services and to support your use of the Services, including providing you with credentials to create accounts, a badge to attend our on-site events, accreditation and communications regarding our events. *Applicable legal ground under GDPR: consent, contract performance.*
- to analyze and subsequently evaluate the various activities offered during our events, to optimize our services, as well as for follow-up purposes. *Applicable legal ground under GDPR: legitimate interests.*

Diversity information: you may voluntarily provide, during the registration process for our events, information about your visible minority status. You will not be obligated to provide this information under any circumstances, and answering these questions is voluntary. We use this information:

- to compile anonymous statistics regarding the diversity of our event participants and ultimately, to launch initiatives to include a larger and more diverse community at our events. *Applicable legal ground under GDPR: consent.*

Vaccination status and COVID-19 exposure information: during on-site events, we may require that you provide us with some information to assess the risk of COVID-19 exposure as well as your proof of vaccination, all in accordance with the laws and government decrees then applicable. We will retain this information only to the extent necessary to reasonably minimize the risk of infection exposure at our events. We use this information:

- to ensure the safety and security of our events. *Applicable legal ground under GDPR: legitimate interests.*
- to comply with applicable laws and government decrees then applicable. *Applicable legal ground under GDPR: compliance with legal obligations.*

DO YOU COLLECT COOKIES, AND IF SO, WHY?

Within the C2 event platforms, we only use strictly necessary cookies, which are explained below. On our public-facing website, we use four types of cookies, as described and explained in the table below.

Category of cookies	Explanations
Strictly necessary	These cookies are essential for our Services to perform their core functions, such as to authenticate you when you connect to your account or save the content of your order when you buy tickets for our events. We include in our definition of

	<p>strictly necessary cookies those that are used to identify and prevent potential security risks to our Services.</p> <p>We use these cookies in our event platform and on our website.</p>
Functionality	<p>These cookies are used to store preferences, such as consent to our legal documents or to cookies, account names and language. We also include in this category the cookies that are used for embedded content, including embedded content from social media platforms such as Facebook or Twitter, including through sharing buttons. These functionalities allow third parties to install cookies, and in some cases, to track you across services where their cookies are installed.</p> <p>We only use functionality cookies on our website, not within the event platform.</p>
Analytics and performance	<p>These types of cookies are used to collect information on how users interact with our Services, such as which pages are often visited, whether there are any bugs, and where do our users come from. This information is available to us in the aggregate, and we use it to improve our Services and understand how you interact with our Services.</p> <p>We only use analytics and performance cookies on our website, not within the event platform.</p>
Advertising	<p>Advertising cookies are used to display relevant advertising to visitors on our websites and on third party platforms, such as LinkedIn. Advertising cookies are also used to understand and report on the efficacy of the ads we serve, such as track details and the number of unique visitors, the number of times particular ads have been displayed, and the number of clicks ads received. We also use these to build user profiles, such as custom audiences, and show you ads based on your online behaviour as part of interest-based advertising. Advertising cookies are generally persistent in nature.</p> <p>We only use advertising cookies on our website, not within the event platform.</p>

DO WE USE GOOGLE ANALYTICS?

We use Google Analytics as part of our performance cookies for our website only, as well as Google Analytics Advertising Features. These features include remarketing with Google Analytics, Google Display Network Impression Report, Google Analytics Demographic and Interest Reporting. Google Analytics collects data for advertising

purposes using online identifiers associated with you. [Click here](#) to jump to the section of this Privacy Policy that explains how you can manage cookies.

HOW WE CONDUCT INTEREST-BASED ADVERTISING

Interest-based advertising is a technique used to deliver relevant ads to you, based on your online activities, such as the websites you visit, which are collected through cookies stored on your web browsers. We use these cookies to direct the online placement of our ads. Without interest-based advertising, you would still see ads online, but they would not necessarily relate to what you like.

The information used for interest-based advertising is stored in cookies and do not allow us to identify you individually as a person, but it does involve online identifiers such as IP addresses that are attached to your device. In other words, our ads are not targeted to you as an individual but rather to data categories, interests, location and websites visited.

Cookies store information about your interaction with our ads and with the website that has installed the cookies. We and our marketing partners combine IP addresses with internet activity data to deliver ads to you. For instance, we may use Facebook Custom Audience tools and other cookies offered by Facebook as part of our marketing campaign.

We support and promote relevant industry guidelines on our marketing practices, and we ensure to deliver ads responsibly. However, you can always control interest-based advertising by managing your cookies preferences, as further explained in the following section.

HOW YOU CAN MANAGE YOUR COOKIE PREFERENCES

If you are not comfortable with cookies, do not worry. Browsers have tools that allow you to manage them, including blocking some types of cookies and deleting those you already have. You can also visit www.youradchoices.ca/en/tools, which contains many tools you can use to manage your preferences regarding digital marketing. The Digital Advertising Alliance of Canada maintains [on this web page](#) a list of browsers with instructions on how to manage your cookies, and this list is kept up to da.

It is important to understand that not all cookies are used for interest-based advertising, as strictly necessary and functionality cookies are required for us to provide you with certain functionalities. We do not recommend that you disable these cookies, as we may not be able to provide you with the Services.

If you are using Chrome or Firefox, the Digital Advertising Alliance of Canada offers a browser plug-in that retains opt-out cookie preferences, even if you delete your cookies. You can also use WebChoices, which is a browser-based tool for opting out of interest-based advertising. All of these tools are described at youradchoices.ca/en/tools.

HOW WE SHARE YOUR PERSONAL DATA

C2 International Inc. organizes its events on behalf of C2 Montreal. Any personal data that you share with us as part of the Services may be shared with C2 Montreal but also

with other affiliates. If you attend any of our events, your name, last name, job title (optional), profile photo (optional) and some of your interactions will also be shared with other participants.

We may use and disclose your personal information when we believe such use or disclosure is permitted, necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce the terms of the agreements for our Services; (e) to protect our operations or those of any of our affiliates or subsidiaries; (f) to protect our rights, safety or property, and/or those of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. In addition, we may transfer your personal data and other information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets.

To the sole extent permitted by applicable laws, we may also share your name, professional email and/or mailing address, and professional phone number with our business partners hosting workshops or other types of session to which you attend during our events, but to the sole extent permitted by applicable laws, and for the purpose of commercial prospection. Where applicable and provided under applicable laws, **you can opt-out from this disclosure by contacting us at privacy@c2.biz.**

We also rely on third-party service providers to perform a variety of services on our behalf (including for or during our events), such as ticketing, payment, networking, marketing, analytics, hosting and data storage.

Our service providers include the following entities:

- **Tito.** We use Tito for ticketing services for our events. [Here is their privacy statement.](#)
- **Twilio.** We use Twilio for communication services through our C2 Agoraplatform. [Here is their privacy statement.](#)
- **Braindate.** We use Braindate to foster knowledge-sharing conversations and meetings between event participants. Here is their [privacy policy.](#)
- **SendGrid.** We use SendGrid for e-mail delivery services. [Here is their privacy statement.](#)
- **Stripe.** We use Stripe for payment services during our events (e.g. to purchase tickets for the next edition of such events). [Here is their privacy statement.](#)
- **Trialfire.** We use Trialfire for connecting analytics and marketing automation services to our website. [Here is their privacy statement.](#)

- **Google Analytics.** We use Google Analytics, a web analysis service of Google, which employs cookies that are stored to your computer in order to facilitate an analysis of your use of our website. [Here is their privacy statement.](#)
- **SalesForce.** We use Salesforce as our customer relationship management platform. [Here is their privacy statement.](#)
- **Google Cloud.** We use Google Cloud for storage services. [Here is their privacy statement.](#)
- **Google Maps.** We use Google Maps for researching and validating your postal address when you purchase tickets for our Services via our website. [Here is their privacy statement.](#)
- **Fastly** used for global video distribution. [Here is their privacy statement.](#)

If we provide your information to third-party service providers, we take reasonable measures to ensure that the rules set forth in this Privacy Policy are complied with and these third parties provide sufficient guarantees to implement appropriate security measures. We also require that they only use your personal data for the limited purposes for which it is provided. When our service providers no longer need your personal data for those limited purposes, we require that they dispose of the personal data. We do not authorize the service providers to disclose your personal data to unauthorized parties or to use your personal data for their direct marketing purposes. If you would like more information about our service providers, please contact us using the contact information provided at the beginning of this Privacy Policy.

RETENTION OF PERSONAL DATA

We will use, disclose or retain your personal data only for as long as necessary to fulfill the purposes for which that personal data was collected, or as permitted or required by applicable law, whichever is longer.

We use both session cookies and persistent cookies. Session cookies are deleted once you close your browser. For instance, YSC is a marketing cookie installed by YouTube which is automatically deleted at the end of your browsing session. Persistent cookies remain installed on your device for some time before they are automatically deleted. [Click here to jump to the part of this Privacy Policy that explains how you can manage your cookies.](#)

If you would like further information regarding the periods for which your personal data will be retained, please contact us using the contact information provided at the beginning of this Privacy Policy.

INFORMATION SECURITY

We have implemented proportional physical, organizational, contractual and technological security measures with a view to protecting your personal data and other

information from loss or theft, unauthorized access, disclosure, copying, use or modification. We have taken steps to ensure that the only personnel who are granted access to your personal data are those with a business 'need-to-know'.

Despite these measures, no method of information transmission or information storage is 100% secure or error-free, therefore, we unfortunately cannot guarantee absolute security. If you have reason to believe that your interaction with us is no longer secure (for example, if you are concerned that your account credentials are compromised), please contact us immediately using the contact information provided at the beginning of this Privacy Policy. If we learn of a security breach involving your personal data, we will inform you and the relevant authorities of the occurrence of the breach as required under applicable law.

WITHDRAWAL OF CONSENT

Whenever we process your personal data based on your consent, you can withdraw that consent at any time by contacting us with the contact information provided at the beginning of this Privacy Policy.

We do not send marketing messages or other unsolicited communications. We send an invitation email when you register for an event. You can unsubscribe from receiving reminders for such events by declining this invitation at any time. We only send notifications for activities which you have registered to attend, and the notifications cease when the event has been completed. If you wish to cease receiving notifications, you may deregister at any time.

RIGHTS REGARDING YOUR PERSONAL DATA

You have the right to access the personal data that we collect about you, and in certain circumstances, to correct such personal data. You also have the right to withdraw your consent. You may be eligible for other rights, depending on where you are located and applicable laws. For example, if the GDPR is applicable, you may have the following rights:

- The right to erasure: 'the right to be forgotten', or right to erasure means you must have procedures in place for removing or deleting personal data easily and securely where there is no compelling reason for possession and continued processing.
- The right to restrict processing: individuals have the right to 'block' or restrict processing of personal data, in certain circumstances.
- The right to data portability: the right to data portability allows individuals to obtain and reuse their personal data across different services for their own purposes.
- The right to object: the right to object means individuals have the right to object to direct marketing (including profiling), processing based on legitimate interest, and purposes of scientific/historical research and statistics, in which case you must

stop processing personal data immediately and at any time, with no exemptions or grounds to refuse, free of charge.

You can exercise your rights at any time by contacting us using the contact information provided at the beginning of this Privacy Policy. It is possible that we cannot comply with your request, for instance, if it is not applicable under the law. If we cannot process your request, we will provide you with explanations.

If you are not satisfied with how we process your request, you can communicate with your local data protection authorities or privacy commissioners, and lodge a complaint. We will provide you with explanations on how to do so in our response to your request based on your location.

When you exercise your rights, we may have to request personal data to validate your identity. If we do so, we will only use it to authenticate you and to respond to your request.

If your request is lengthy, difficult or costly to comply with, and if we are permitted to do so by law, we may charge you a reasonable fee to assist you. We will respond to your request within 30 days. If we cannot comply with your request, we will inform you of the reason.

If you have any issue with how we collect, use or disclose your personal data, or how we responded to your request, please let us know at **privacy@c2.biz**.

If you are still not satisfied, you can lodge a complaint to the Office of the Privacy Commissioner of Canada using this online form, or to your local data protection authority.

If you are located in Canada, the Office of the Privacy Commissioner of Canada drafted [this FAQ](#) to help you access your personal data when it is held by a business. You can also contact the Office of the Privacy Commissioner of Canada's Information Center:

Telephone

9:00 am to 4:00 pm EST

Toll-free: 1-800-282-1376

Mailing address

Office of the Privacy Commissioner

30 Victoria Street

Gatineau, Québec

K1A 1H3

INTERNATIONAL TRANSFER AND STORAGE OF INFORMATION

We use the Google Cloud Platform to host our Services and store your personal data. The servers are located in Canada and in the United States (North Virginia). However, our suppliers and third parties may process your personal data internationally. As a result, your personal data may be transferred to countries outside your country of residence, which may have different data protection rules than in your country. While such

information is outside of your country, it is subject to the laws of the country in which it is located, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. However, our practices regarding your personal data will at all times continue to be governed by this Privacy Policy and, if applicable, we will comply with GDPR requirements providing adequate protection for the transfer of personal data from the EU/EEA to a third country.

CHILDREN'S INFORMATION

As set forth in the [Ticket Purchase and Event Participation Terms of Use](#), participants to our events must be at least 18 years of age. We do not knowingly collect the personal data of children under the age of 18. If you are under 18 years of age, please do not use our Services. If we discover that a person under the age of 18 is participating in one of our events or using any of our Services, we will take action to prevent this from continuing.

"DO NOT TRACK" SIGNALS

If you are a resident of California, you have the right to ask companies to stop tracking you on the Internet. Please note that we do not respond to Do Not Track signals. However, if you have a legitimate request about your personal data, be assured that we will try our best to assist you!

PRIVACY POLICY UPDATES

This Privacy Policy is current as of the "updated" date which appears at the top of this page. We may modify this Privacy Policy from time to time such as to reflect new personal data processing activities, adapt to new laws and regulations, reflect technological or corporate changes, such as a result of a merger and acquisition.

When changes are made to this Privacy Policy they will immediately become effective when published in a revised Privacy Policy posted on our website unless otherwise noted. We may also communicate the changes through our Services or by other means. By submitting your personal data to us, by registering for or using any of the Services we offer, by using our website, or by voluntarily interacting with us after we publish or communicate a notice about the changes to this Privacy Policy, you consent to our collecting, using and disclosing your personal data as set out in the revised Privacy Policy.

C2 AGORA - PRIVACY POLICY

Latest Update: August 2022

This Privacy Policy (the “**Policy**”) contains information about how C2 International Inc. (referred to as “**C2**”, “**we**”, or “**us**”) collects, uses and discloses your personal data when you are:

- using our online events and experiences platform C2 Agora, available at ww.c2agora.com (and custom subdomains created for events) as a web application (the “**Platform**”); and
- exchanging with us by emails, social media or otherwise with respect to the Platform (collectively, the “**Services**”).

In this Privacy Policy, we use the term “**Client**” to refer to any organization, entity or company that subscribed to the Platform to host, manage and administer their event and experience. By comparison, “**you**” and “**Platform Users**” refers to individuals who are using or accessing the events/experiences hosted on the Platform and administered by our Clients.

As mentioned above, this Privacy Policy applies to our Services, which are used by our Clients. We try our best to describe the processing of personal data that occurs in the context of our Services, but please keep in mind that our Clients may use it differently. That being said, this Privacy Policy does not apply to how personal data is processed outside our Services. Please see section 4 to learn more about what information we share with them, our relationship with them as well as their and our respective roles relative to the handling of your personal data.

If you have any questions regarding the processing of your personal data, you can email us at privacy@c2.biz. However, if your request is about how any of our Clients process your personal data, we recommend that you reach out to them directly.

1. What do we mean by “personal data”?

Personal data is information that relates to a natural person or allows for the identification of a natural person. Some information may not be personal on its own, but may become personal data if associated with personal data or if the sum of the information allows us to identify you. We include cookies in our definition of personal data. The definition of what constitutes personal data is subject to the laws applicable in your jurisdiction, and this Policy shall be interpreted in accordance with applicable laws.

For the purposes of this Privacy Policy, we define personal data as any information which relates to a natural person and allows that person to be identified. For example, this means that we consider electronic identifiers, such as emails and passwords, as personal data. You should know that some laws do not include business contact information (ex. name, title, work email, etc.) and other employees' personal data in the legal definition of personal data. However, to be transparent with our Platform Users, we included such personal data in our own definition of personal data.

We include cookies in our definition of personal data, although some laws may not consider cookies as personal data.

2. What types of personal data does C2 collect, and why?

We collect personal data to provide our Services. This section does not cover the cookies that we use. Our use of cookies is covered in the questions below.

Under the European General Data Protection Regulation (“**GDPR**”), where applicable, we use different legal basis to justify our processing of your personal data, such as consent, the performance of a contract and our legitimate interests. However, these legal basis may not be valid under all jurisdictions and are indicative. For instance, in Canada, where such legal basis are not applicable except for consent, we collect, use and disclose such personal data with your consent, which may be explicit or implied. You can withdraw your consent at any time; we explain below how you can do so.

Category	Description	Justification	Legal basis under the GDPR
Services			
Electronic Data	IP address, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons and language.	This information is collected automatically by our Services to function effectively, to fix bugs, or ensure the security of our Services. We also use this information for analytics purposes to help us know more about your use of our Services. These may be collected as part of cookies.	Legitimate interests, compliance with legal obligations.
Usage Data	Time spent on the Services, pages visited, links clicked, language preferences, pages that led or referred you to the Website.	We collect this information for analytics purposes.	Legitimate interests.
Communication Data	Email addresses, identification data, publicly available information, email content, logs of live chats.	If you communicate with us by email, on social media, or by any other means, we collect the personal data that you share with us, such as your email address and the content of your communication. If you communicate with us using social media, we will have access to your publicly available information.	Consent, legitimate interests.
Platform			
Registration Data	First name, last name, title, email address, username and password.	We collect this information to create Platform Users’ accounts on our Platform.	Legitimate interest,

	We may also request additional Registration Data upon registration depending on our Clients' needs such as title and the name of the company you work for.	We also use your email address to communicate with you about the Platform, such as for updates or maintenance.	performance of a contract.
Platform User Data	Events subscriptions and tickets. Event participation. Activity on the Platform during events, Interactions with other participants.	We collect this information about Platform Users to: (a) provide you and our Clients with the functionalities of the Platform, such as hosting live sessions, managing their event; (b) to provide Clients with real-time analytics about their events; and (c) to allow Clients to use aggregated data, reports and past data about Platform User Data and other non-confidential data to create estimates for upcoming events, conduct benchmarking and marketing analysis.	Legitimate interests, performance of a contract.
User Content	Photos, documents, messages and comments.	Platform Users can upload photos and documents as part of our management capabilities, and interact with each other directly on the Platform. To offer these functionalities, we collect the information that you decide to process through the Platform.	Consent.
Support Data	Email addresses, email, message and chat conversation content, account information and electronic data	As part of the Platform, we may offer support to Platform Users, depending on what's agreed upon with our Clients. To provide you with support, we collect the personal data included in your inquiries, as well as the personal data required to identify you and help you resolve the issue.	Legitimate interests.
Integration Partners Data	Personal Data collected and used by integration partners (please refer to their respective privacy policy)	Many tools and software can be integrated to our Platform and services offered to our Clients, including Twilio, Google, Dolby.io and Flowplayer. If you or Clients decide to integrate such third-party tools with our Platform, this may result in us receiving some of your personal data from those. Integration partners are not suppliers of us. You are required to enter into	Consent.

		distinct agreements with them and review their privacy policy before connecting their applications with our Platform. We are not responsible for the privacy practices of third parties that are not our suppliers.	
Marketing Activities			
Newsletter	Email and consent to receive emails.	If you consent to receive our newsletters, we will send you emails about updates and marketing content. You can unsubscribe at any time directly in the emails or by contacting us.	Consent; compliance with legal obligations.
Social Media	Publicly available information	If you follow us or interact with us on social media, we may process your personal data for marketing or advertising purposes, subject to applicable laws, including those on consent.	Consent.

3. What cookies do you use and why?

We use cookies for our Services to function as intended and to ensure that our Services are secure. Cookies are also useful to identify bugs and errors. We use both first-party and third-party cookies installed by partners on our Platform.

Cookies are messages that web services pass to your web browser when you navigate the Internet. Your browser stores each of these messages in a small file. Our definition of cookies also includes similar technologies, like pixel and web beacons that are installed on your devices. Cookies can track you across different websites, and serve different purposes. There are various types of cookies: (1) essential; (2) functional; (3) marketing and (4) analytics. Some stay installed only during your session on a website, others are installed for several months or years.

We collect cookies that classify in two categories:

Type of cookie	Description	Legal basis under the GDPR
Essential	Essential cookies are necessary to operate the core functions of our Services. These include login cookies, session ID cookies, language cookies as well as security cookies.	Legitimate interests
Functional	Functional cookies are used to provide you with some functionalities, such as a live chat, and to remember preferences, consents and configurations.	Legitimate interests

4. To whom do you disclose my personal data to?

Let's be clear, we do not sell your personal data to data brokers. However, we do share your personal data with certain types of third parties to provide you with the Services, conduct marketing and as required by the law. We can also share your personal data in the context of a merger and acquisition, as part of bankruptcy procedures or for other corporate requirements.

Category	Explanations
Clients	When Platform Users attend events and other experiences hosted by our Clients on our Platform, we share their Registration Data, Platform User Data and their User Content with such Clients, for them to host, manage and administer their events and experiences. Please refer to the relevant Client that is hosting the event/experience to which you are attending to have more detail on how they may process your personal data.
Service Providers	Service providers are used to provide you with some functionalities of the Services that are outsourced to third parties and as necessary for us to accomplish the purposes set forth above. For instance, we use a third party to send you emails.
IT Service Providers	We use IT Service Providers to offer you the Services, such as to host the Services.
Integration Partners	Many tools and software can be integrated to our Platform and services offered to our Clients, including Braintree, Twilio, Google, Dolby.io and Flowplayer. If you or Clients decide to integrate such third-party tools with our Platform, this may result in us receiving some of your personal data from those. Integration partners are not suppliers of C2. You are required to enter into distinct agreements with them and review their privacy policy before connecting their applications with our Platform.
Law enforcement and other authorities	We may receive requests by authorities to access your personal data. We will validate that the request is licit before responding. When possible, we will advise you. We will only share what is strictly required.

We may share your personal data with our financial and legal advisors or auditors if reasonably required, or in the event we would be required to do so to defend our rights and interests.

In the case of a merger or acquisition, sale of assets, corporate reorganization, bankruptcy filing, insolvency procedures or similar circumstances, your personal data would be considered our assets and property of C2. In these circumstances, ownership of the personal data we collected may be transferred or we may have to share some of your personal data to conclude, negotiate or discuss with third parties. We will only share what we are required to share for these specific purposes.

5. Where do you store my personal data?

The servers of our hosting provider are located in Canada. However, our suppliers and third parties may process your personal data internationally, including in the United States. When it is transferred in such other countries, your personal data may be subject to rules and guarantees that are less protective than laws applicable in your country of residence.

6. How long do you retain my personal data?

We retain personal data for as long as necessary to provide you with the Services, to perform our marketing campaigns effectively or as required by applicable laws, whichever is longer.

7. How do you keep my personal data secure?

We strive to implement security features that are proportional to the risks, taking into consideration factors such as the sensitivity of the personal data that we collect.

However, it is important to understand that **we cannot guarantee the security of personal data on the Internet, and that you must also take precautions, such as not sharing your credentials with anyone.**

8. Can I manage my cookie preferences?

You can always manage your cookie preferences. However, some functionalities of the Services may require cookies in order to perform as expected, or for security purposes. You can control your cookie preferences through your browser. Depending on the browser that you are using, different instructions are applicable.

9. Do I have any rights over my personal data?

Yes. These rights vary depending on where you are located.

You generally have the right to access your personal data and to correct your personal data if inaccurate, in certain circumstances.

Under the GDPR (if applicable to you), you have additional rights, such as the right to object to the processing of your personal data, the right to data portability, the right to erasure and the right to restrict the processing of your personal data:

- The right of access: under the right of access, you have the right to gain access to your data free of charge in a commonly used format – such as an electronic format if the request is made electronically.
- The right to rectification: you are entitled to have your personal data rectified if inaccurate or incomplete and we will respond to such request within one month if not deemed complex.
- The right to erasure: ‘the right to be forgotten’, or right to erasure, means you have the right to request that your data be deleted easily and securely where there is no compelling reason for possession and continued processing.

- The right to restrict processing: you have the right to 'block' or restrict processing of personal data, in certain circumstances.
- The right to data portability: you also have the right to data portability, which allows you to obtain and reuse your personal data across different services for your own purposes.

You can exercise your rights at any time by contacting us at privacy@c2.biz. Platform Users can also review their parameters on the Platform. For instance, you can change your name, e-mail, password and other Identification Data within the Platform without involving us, in the "My Settings" section.

We will respond to your request within 30 days. If we cannot comply with your request, we will tell you why.

If you are located in Canada, note that the Office of the Privacy Commissioner of Canada drafted [this FAQ](#) to help you access your personal data when it is held by a business. You can also contact the Office of the Privacy Commissioner of Canada's Information Center:

Telephone

9:00 am to 4:00 pm EST

Toll-free: 1-800-282-1376

Mailing address

Office of the Privacy Commissioner

30 Victoria Street

Gatineau, Québec

K1A 1H3

If you have any issue with how we collect, use or disclose your personal data, or how we responded to your request, please let us know by contacting our privacy officer at privacy@c2.biz. We will do our best to improve our processes to make certain that it does not happen again. We will also provide you with additional information about our practices if you would like us to do so.

If you are still not satisfied, you can lodge a complaint to the Office of the Privacy Commissioner of Canada [using this online form](#), or to your local privacy regulators.

10. If I gave consent for you to process my personal data, may I opt out?

Yes, whenever we process your personal data based on your consent, you can withdraw that consent at any time by contacting us at privacy@c2.biz. However, please note that you may be unable to attend your events / experiences, or continue using our Services or some of their functionalities if you withdraw your consent.

You can also opt-out of receiving commercial emails from us, by clicking the unsubscribe link at the bottom of such email.

11. Children

We do not knowingly collect personal data from children under the age of 14. In the event you become aware that an individual under the age of 14 has enrolled without parental permission, please advise us immediately.

12. Do you respond to “Do Not Track” signals?

If you are a resident of California, you have the right to ask companies to stop tracking you on the Internet. Please note that we do not respond to Do Not Track signals. However, if you have a legitimate request about your personal data, be sure that we will try our best to assist you!

13. Can we change this Policy?

We may need to modify this Policy to reflect new processing activities, adapt to new laws and regulations or reflect technological changes or corporate changes, such as a result of a merger and acquisition. We may also change this Policy at our sole discretion. In case of material changes, we will send an email to Platform Users. You can view the date of the latest update at the top of this page, and you can always reach out to us at privacy@c2.biz, should you have any questions. Your continued use of the Services is deemed an acceptance of this Policy.