

Privacy Policy

Privacy Policy for hireasanta.ca

Last updated: February 19, 2021

PLEASE READ THE FOLLOWING PRIVACY POLICY CAREFULLY BEFORE DOWNLOADING, READING, USING, ACCESSING, OR PURCHASING ANY PRODUCT OR SERVICE THROUGH OUR WEBSITE OR SERVICES.

1. OVERVIEW

hireasanta.ca (“Hire A Santa,” “us,” or “we”) respects the privacy of users of our website and its related services.

The following privacy policy (the “Policy”) tells you about the information that HireASanta.ca Site collects through the Services and how we may use or disclose that collected information.

By accessing the Services, continuing to access the Services, purchasing any products or services through the Services, downloading and/or using the Application, or submitting any information through the Services, you are consenting to the information collection and use practices described in this Policy, as modified from time to time by us, as described below. Your use of the Services is also governed by the Terms of Service all of which are to be expressly incorporated and included as part of this Policy.

2. UPDATES

HireASanta.ca Site reserves the right to make changes to this Policy at any time, and will post any revised Policy on this page. You will know we have changed the Policy when you see a new updated date at the top of this Policy. HireASanta.ca Site will not notify the Services’ users of any such changes by email or other personal contact. We encourage you to check the date of this Policy whenever you visit the Services so that you will know when you need to review the Policy for modifications.

3. INFORMATION COLLECTION

Age Restriction.

HireASanta.ca Site does not intend to use the Services to collect any information from children under age 18. By submitting any information through the Services, you represent and warrant that you are older than age 18.

Collection of Submitted Information.

HireASanta.ca may collect and store any information you submit or upload through the Services, whether through your submission of information through a form, purchase of a product, or otherwise. This information may include, but is not limited to, your name, address, email address, telephone number, payment information, or any other information submitted by you or any user through the Services.

Collection from Third-Parties.

HireASanta.ca may collect information about you from third-parties, including from any account through which you log into, or otherwise interact with, HireASanta.ca (e.g., Facebook or Google). If applicable, HireASanta.ca Site may have access to certain information from your linked Google or Facebook account, including your public profile information, your email address, or other information possessed by those third-parties. HireASanta.ca may aggregate any information about you collected from any source.

Passive Information Collection.

HireASanta.ca may also collect passive information about your device, visit, or use of the Services, including, but not limited to, the date and time of your visit, the length of your visit, the specific webpages you visited, your IP address, the type of web browser and operating system used, the address of any website that directed you to the Services, and information about your mobile device used to access the Services (including phone number, operating system details, and any applicable unique identifiers for you or your device, including your devices' Unique Device Identifier (UDID), any Apple or iOS identifiers (e.g., IDFA or an Advertising Identifier), any Google or Android identifiers (e.g., Android or Google Advertising ID), any Windows identifiers (e.g., Windows Advertising ID), or any other similar identifiers which identify you or your device). HireASanta.ca may collect and aggregate usage information related to your use of the Services.

Cookies and Related Technologies.

We, or other third-parties assisting us, may use cookies, web beacons, local shared objects (sometimes called “flash cookies”), or other similar technology in connection with your use of the Services (collectively, “Cookies”). Cookies are small data files that may have unique identifiers, and reside, among other places, on your computer or mobile device, in emails we send to you, and on our web pages. Cookies may transmit information about you and your use of the Services, such as your browser type, search preferences, data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use. Cookies may track activities over time and across websites. You can disable some (but not all) Cookies in your device or browser settings, but doing so may affect your ability to use the services provided through the Services.

Third-Party Vendors and Advertisers.

HireASanta.ca may use third-party vendors or advertisers to collect and analyze information about your use of the Services. These third-parties may use cookies or other similar mechanisms to provide us with information and analysis about your use of the Services. This information collection and analysis allows us to better understand how the Services are being used so that we can strive to provide the most relevant content to our users. These third-parties may collect information about your online activities over time and across different websites. This information may be used to serve interest-based advertisements on our website or other websites across the internet. We may combine information gathered from one or more of these services.

Analytics Services.

HireASanta.ca may, from time to time, use one or more analytics service providers, including, for example, Google or Facebook. Maintain My WordPress Site may use the following Google analytics features: AdWords, Remarketing, Google Display Network Impression Reporting, DoubleClick, and Google Analytics Demographics and Interest Reporting. We may combine information gathered from one or more of these services.

For information on how Google collects and uses the information collected through HireASanta.ca use of the Google analytics and advertising services, if applicable, see the Google, Inc. Privacy Policy here (<https://www.google.com/intl/en/policies/privacy/>).

For more information about the Google analytics features used by Maintain My WordPress Site, if applicable, click here (https://support.google.com/analytics/answer/2404395?hl=en&ref_topic=1631776&rd=1).

For information on how to see and change your Google Ad Settings, click here (<https://support.google.com/ads/answer/2662856?hl=en>).

For information on the use of the Google Analytics Opt-Out Browser Add-On, click here (<https://tools.google.com/dlpage/gaoptout/>). However, Maintain My WordPress Site does not necessarily endorse this add-on and does not guarantee that using the add-on will be effective.

For more information on how Facebook Analytics may collect and use the information collected through HireASanta.ca's use of the Facebook's analytics and advertising services, if applicable, see the Facebook data use policy and related policies here. (https://www.facebook.com/full_data_use_policy).

The Services may, from time to time, also include social media functions allowing you to like or share content on social media platforms like Facebook or Twitter. These features may collect your information through the use of cookies or other technologies. These features may be hosted by a third-party and governed by the third-party's privacy policy.

HireASanta.ca does not guarantee that it will take action in response to do-not-track signals or similar mechanisms. Additionally, some third-party service providers may still collect tracking information even if you have enabled your browser's do-not-track functionality or utilized a similar do-not-track mechanism.

4. INFORMATION USE PRACTICES

HireASanta.ca may use the collected information or data described above, individually or in the aggregate, for any lawful purpose, including, but not limited to, such purposes as connecting sellers, affiliates, and customers, analyzing and tracking user activity on the Services for individual users or for groups of users, tracking and analyzing usage trends, personalizing the Services to better reflect your preferences, serving more relevant advertisements, or enhancing your and other users' use of the Services. All collected information may be linked to specific website users and may result in the tracking of the usage information for individual users.

HireASanta.ca may also use your submitted information to contact you, via regular mail, email, text message, telephone, or otherwise, regarding your account, the Services, your purchased services or products, or other relevant or promotional information or offers as determined by Maintain My WordPress Site or its partners. By submitting your contact information to HireASanta.ca or HireASanta.ca' partners, you consent to receiving such communications.

5. DISCLOSURE OF INFORMATION

Except for the limitations expressly discussed herein, if any, HireASanta.ca may disclose, sell, or transfer any collected information to third-parties for any lawful purpose in our sole discretion.

Disclosure of Customer, Affiliate, or Seller Information.

HireASanta.ca may disclose any collected information about a customer to all sellers whose products or services the customer purchases and to any affiliates through whom the customer is linked to the seller. HireASanta.ca may disclose any collected information about an affiliate to all sellers whose products or services the affiliate advertises and to any customers that were linked to a seller through the affiliate. HireASanta.ca may disclose any collected information about a seller to any affiliates and to any customers who purchase the seller's products or services. The disclosed information about a customer, affiliate, or seller include, but are not limited to, the person's name, user name, contact information, and information related to any transactions between those persons.

Third-Party Services.

If you log in to HireASanta.ca through a third-party service like Facebook or Google, then those third-parties may have access to certain information about your use of HireASanta.ca. For more information on the type of information those third-parties may collect about you, please review the privacy policies for those third-parties.

Vendors.

HireASanta.ca may use third-party companies, agents, or contractors to perform services on our behalf. For example, HireASanta.ca may partner with other companies to personalize our web pages, analyze our website or usage information, process payments or credit card transactions, fulfill or ship orders, collect debts, analyze or enhance the data collected by the Services (including user's interaction with the Services), or otherwise assist HireASanta.ca in better serving the Services' users. During the course of providing HireASanta.ca with

these services, these third-parties may have access to your personal and non-personal information in order to provide the services we requested from those third-parties.

Affiliates and Marketing.

HireASanta.ca may disclose your collected information, including information about any purchases you make through the Services, to Maintain My WordPress Site' affiliated entities. Maintain My WordPress Site may also disclose your information to third-parties for marketing purposes. These affiliates and third-parties may contact you via any method of contact you provide to HireASanta.ca.

Legal Compliance.

HireASanta.ca also reserves the right to disclose personal information when we reasonably believe disclosure is required by law, if we reasonably believe disclosure is necessary to establish or exercise legal rights, or in situations involving potential threats to physical safety.

Merger or Acquisition.

In the event that HireASanta.ca is acquired by or merged with a third-party, we reserve the right to sell or otherwise transfer any and all information we have collected from you as part of that transaction and such third-party will assume the rights and obligations with respect to that information as described in this Policy.

6. DATA PROTECTION

WHAT DO WE DO WITH YOUR PERSONAL DATA?

Main Uses of Your Data

This section of the Policy describes the things that we do with your data which relate directly to your use of the Site and our services. They are the things that we hope you would expect us to do with your information. We will use your information:

- to provide the products available on our Site to you;
- to contact you for your views on our services and to notify you occasionally about important changes to our Terms of Use or this Policy or developments to this Site or our services.

Technical Uses

This section of the Policy describes the things that we do with your data that arise from our monitoring of the Site and the collection of your information whilst using the Site. We may use this information:

- to identify patterns that we can use in our marketing strategy and to help us develop, administer, support and improve our services and features and adverts;
- to conduct reviews that assist us in the improvement and optimization of our Site;
- to ensure that content from our Site is presented in the most effective manner for you and for your computer;
- to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- as part of our efforts to keep our Site safe and secure.

We may combine technical information with other information that we have about you to help us with our processing of your information as described in this Policy.

Use of your data for marketing and communications

When you join a mailing list, which is not required to use the site, we may use personal information, like your email address, to provide marketing messages to you or allow us or third parties to communicate with you on third party services. We will always seek your consent before doing so and you can opt out of marketing and other communications at any time by contacting us at info@simbasystems.com. You can always make use of the Site without having to agree to marketing. The types of things that we may do include:

- providing direct marketing advertisements and communications to you via email, text, post or telephone or via our selected third parties;
- making suggestions and recommendations to you and other users of our Site about goods or services that may interest you or them;
- communicating with you on third party social media platforms and sharing your information with that social media platform;
- monitoring the effectiveness of our direct marketing communications and your responses to it.

7. WHO HAS ACCESS TO YOUR PERSONAL DATA?

We retain access to all personal information that we have collected from you or about you.

Our product fulfillment company and email marketing companies also retain some of the data (for example your name and email are passed to our email marketing partner so we may send product confirmation and marketing emails).

When our service is available via the websites of our partners, those partners may have access to your information. We may also have links to other websites from our Site. We are not responsible for the content, security, privacy policies and practices of any other websites, even if you access them using links from this Site or if you can access this Site or use our services from them. We recommend that you check the policy of each website that you visit and make sure that you are comfortable with the terms of such policies before providing any personal information.

If our business is sold or merged, or if we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets. We will make sure that any such transfer is done in a secure way.

If we offer or supply a service to you that is provided on our behalf by a third party we may have to pass your information to them in order to deliver the service. By using this Site you consent to us providing your information to the third parties authorized by us to provide such services. We may also use third parties to provide services on our behalf which may include processing (but not using themselves) your information e.g. to complete partial addresses or to augment the information we hold about you. In either case, we will not pass your information to anyone who is not also subject to adequate privacy commitments in our contract with them and we will not allow the third party to use your information for marketing purposes without your consent.

Other services with access to your data:

Google Analytics

We will not otherwise disclose, sell or distribute your information to any third party without your permission unless we are required to do so by law or to obtain

professional advice. We will retain your information for as long as is reasonable and necessary and no longer than permitted by law.

8. PERSONAL DATA STORAGE

We maintain your data at the server of our internet service provider, our email marketing company, our offices and our product fulfillment centers.

If you leave a comment on this website that information is stored at our hosting company Dreamhost. That information includes your name, your avatar, your comment, the time you left the comment and your ISP address.

For any Europeans using the site, the data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or contractors. Territories outside of the EEA may not have equivalent legal protections to those that apply within the EEA but we are under a duty to make sure that our suppliers and contractors located outside of the EEA continue to take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy. By submitting your personal data to us, you agree to this transfer, storing or processing.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; 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.

We follow strict security procedures to ensure that your personal information is not damaged, destroyed or disclosed to a third party without your permission and to prevent unauthorized access to it. The computers that store the information are kept in a secure facility with restricted physical access and we use secure firewalls and other measures to restrict electronic access. If we are working with third parties, we will require them to have in place similar measures to protect your information.

9. SHARING YOUR PERSONAL DATA

We may share your personal data as follows:

- Third Parties Designated by You. We may share your personal data with third parties where you have provided your consent to do so.

- Our Third Party Service Providers. We may share your personal data with our third party service providers who provide services such as data analysis, payment processing, information technology and related infrastructure provision, customer service, email delivery, auditing and other similar services.

10. YOUR RIGHTS

You have the right to use our Site without consenting to marketing and communication services that we provide. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. We always use the most recently submitted form to be your current consent status. If you are a registered user, but not signed in when you submit a form, we will not be able to use your saved settings so will deem your consent choice to be as per the form you submit at the time. You can exercise your right to prevent such processing by ticking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@simbasystems.com.

Your Rights:

- **Opt-out.** You may contact us anytime to opt-out of: (i) direct marketing communications; (ii) automated decision-making and/or profiling; (iii) our collection of sensitive personal data; (iv) any new processing of your personal data that we may carry out beyond the original purpose; or (v) the transfer of your personal data outside the EEA. Please note that your use of some of the Site may be ineffective upon opt-out.
- **Access.** You may access the information we hold about you at any time via your profile/account or by contacting us directly.
- **Amend.** You can also contact us to update or correct any inaccuracies in your personal data.
- **Move.** Your personal data is portable - i.e. you to have the flexibility to move your data to other service providers as you wish.
- **Erase and forget.** In certain situations, for example when the information we hold about you is no longer relevant or is incorrect, you can request that we erase your data.

If you wish to exercise any of these rights, please contact us. In your request, please make clear: (i) what personal data is concerned; and (ii) which of the above rights you would like to enforce. For your protection, we may only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we may need

to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in any event, within one month of your request. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion.

The Data Protection Act 1998 (DPA) and the GDPR (in Europe) gives you the right to access information held about you. Your right of access can be exercised in accordance with the DPA and GDPR.

*Asking us to not process your data does require us to delete your data, which is legally considered processing your data. So respectfully inform you that we'd have to do that one thing.

11. COMPLAINTS

We are committed to resolve any complaints about our collection or use of your personal data. If you would like to make a complaint regarding this Policy or our practices in relation to your personal data, please contact us at: info@hireasanta.ca. We will reply to your complaint as soon as we can and in any event, within 30 days. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority

12. THIRD-PARTY LINKS

The Services may contain links to websites not owned or controlled by HireASanta.ca. HireASanta.ca does not necessarily review or endorse the content of these linked websites. You should review the terms of service and privacy policies of all websites you visit.

13. SECURITY

We use commercially reasonable efforts to protect the information we collect on the Services. Unfortunately, however, no security system can be guaranteed to be 100% effective. Accordingly, we cannot and do not guarantee the security of your personal information and cannot assume liability for improper access to it. Do not submit confidential information through the Services.

You are responsible for restricting access to your computer or mobile device through which you access the Services. Users of public or shared computers or unprotected mobile devices should log out at the completion of each visit to our Services. By using the Services, or providing personal information to us through

any means, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of these Services.

14. INTERNATIONAL DATA TRANSFER

Your information, including personal data that we collect from you, may be transferred to, stored at and processed by us outside the country in which you reside, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By accepting this Policy, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

15. DATA RETENTION

HireASanta.ca may retain the personal and non-personal information or other collected data, individually or in the aggregate, as described above, after you delete your account or have ceased using the Services. However, HireASanta.ca does not guarantee that any information will continue to be available after such deletion or cessation.

16. VIEWING AND UPDATING INFORMATION

You are responsible for updating and maintaining the accuracy of your personal information that you provide to or through the Services. If you believe you have submitted inaccurate information through the Services, and would like HireASanta.ca to change such information, please contact HireASanta.ca at the address below.

17. CONTACT

If you have questions concerning this Privacy Policy, please contact HireASanta.ca at the following email address:

HeadElf@HireASanta.ca

Vancouver, BC
Canada