

# Privacy Policy

Updated: June 24, 2020

**Shopper Army**<sup>®</sup> respects your privacy and considers it to be of the utmost importance. The following Privacy Policy (the “Policy”) demonstrates our commitment to your privacy and shows the value we place on the information you provide to us. In all interactions with us you are protected by confidentiality, security, and most importantly, common sense. We will be transparent about how we manage your personal information and our privacy practices, so you can make informed decisions. We will protect your personal information and handle it responsibly and we will use your personal information to benefit you and enhance your consumer experience.

This Policy informs you about the privacy practices and policies implemented on this Shopper Army website and all the sites of Shopper Army Inc. and all its authorized affiliates, including BrandSpark International Inc. and Best New Product Awards Inc. (altogether “**Shopper Army**” or “**we**” or “**us**” or “**our**”). It describes how we collect, use, process and share information about you, your rights and choices about such use and sharing, and how we manage the personal information collected through our websites [www.ShopperArmy.com](http://www.ShopperArmy.com) , [www.ShopperArmy.ca](http://www.ShopperArmy.ca) , [www.BrandSpark.com](http://www.BrandSpark.com) , [www.BestNewProductAwards.com](http://www.BestNewProductAwards.com) , [www.BestNewProductAwards.biz](http://www.BestNewProductAwards.biz), and [www.BrandSparkMostTrusted.com](http://www.BrandSparkMostTrusted.com) and their programs, as well as related internal websites, social media pages, intranet, mobile applications and other online communications (collectively the “**Site**” or “**websites**”). This policy applies to your use of any of our services that reference this policy or that are otherwise described in this policy as a Shopper Army offering or method of information collection (collectively, the “**Service**”).

This Privacy Policy applies to personal information collected, used, or disclosed by Shopper Army in the course of commercial activities, and to the management of the information in any form whether oral, electronic or written. It does not impose any limits on the collection of, use or disclosure of a) non-personally identifiable information; b) the name, title, business address and/or telephone number of an employee of an organization; c) other information about an individual that is publicly available. This policy does not cover personal information collected or held by us about our employees.

If you continue using this Site you must agree to this Privacy Policy. When you use the Site or Services, you also have responsibilities which are outlined in our [Terms and Conditions](#) which we recommend you consult prior to using the Site/Service in order to inform yourself of your obligations.

## **Some Definitions**

“**Consent**” is voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of Shopper Army. Implied consent is consent that can reasonably be inferred from an individual’s action or inaction.

“**Personal information**” is broadly defined as information about an identifiable individual that could be used to specifically identify you as the user, including information such as your name, address, telephone number, birth date and e-mail address. Personal information does not include the name, title, business address, or telephone number of an employee of an organization. Data we collect with key personal identifiers removed, so that it is impossible to determine the identity of the person to whom the information relates, is not considered personal information.

“**Respondent**” is a member of the public who provides personal information to Shopper Army, for example in the course of participating in a panel survey or during quantitative or qualitative marketing or social research.

“**Third party**” is an individual or organization outside of Shopper Army.

“**User-submitted Content**” or “**Submissions**” means information or content that you voluntarily choose to submit or post to the Site/Service for public display, such as photos, comments, reviews, and your public profile information.

## **The Ten Privacy Principles that we follow:**

**1. Accountability:** Shopper Army is responsible for maintaining and protecting all personal information within its possession and/or under its control, and where possible tries to use contractual or other means to provide a comparable level of protection when information is being processed or used by a third party. Shopper Army has designated a Privacy Officer to oversee the company's compliance with this Policy, and other individuals within Shopper Army may be delegated to act on behalf of the Privacy Officer.

**2. Identifying Purposes (for collection of personal information):** We will identify the purposes for which personal information is collected, either before or at the time of collection. When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose will be identified and the consent of the respondent will be acquired prior to use or disclosure, unless the new purpose is permitted or required by law.

**3. Obtaining Consent (for collection, use or disclosure of personal information):** We will only collect, use and disclose your personal information with your knowledge and consent, except where otherwise required or permitted by law. Under special circumstances, and always honestly and lawfully, Shopper Army may prompt you to enter personal information. You have the option to decline our request for personal information, terminate your consent or a subscription to a personalized service you have previously consented to or accepted.

**4. Limiting Collection (of personal information):** We will limit the collection of your personal information to only those details that are necessary for the purposes identified, and information will be collected fairly and lawfully. We collect personal information about an individual primarily from that individual or a member of the individual's household. Except as permitted by law, Shopper Army will only collect personal information from external sources, such as client organizations, if the individuals have consented to such collection.

**5. Limiting Use, Disclosure and Retention (of personal information):** Your personal information will only be used or disclosed for the purpose for which it was collected, unless you have otherwise consented, or when it is required or permitted by law. We will not disclose, trade, rent, sell or otherwise transfer your personal information, without your consent, except as otherwise set out herein. Access to personal information about respondents is granted only to Shopper Army employees with a business need-to-know or whose duties reasonably require it. We retain personal information only as long as is required or necessary to fulfill the purposes for which it was collected and as permissible by applicable law.

**6. Accuracy (of personal information):** We will keep personal information we collect as accurate, complete and up-to-date as necessary to fulfill the purposes for which it was collected. We will update personal information about respondents and employees as necessary to fulfill the identified purposes or upon notification by the individual.

**7. Security Safeguards (protection of information):** We protect the personal information we collect with security safeguards appropriate to the sensitivity of the information. We have personal information retention processes designed to retain personal information of our customers for no longer than necessary or to otherwise meet legal requirements.

**8. Openness (concerning policies and procedures):** Information about our policies and practices relating to the management of personal information will be made readily available to you as an individual.

**9. Individual Access:** Upon written request by you to the Privacy Officer, we will inform you of the existence, use and disclosure of your Personal Information, as well as give you access to the information. You will be able to challenge the accuracy and completeness of your information, and to amend it as necessary.

**10. Challenging Compliance:** Shopper Army will investigate all complaints concerning compliance with its Privacy Policy and may take appropriate measures to resolve the complaint, including amending its policies and procedures if necessary. The respondent will be informed of the outcome of the investigation regarding the complaint.

## **How do we collect your information?**

We collect personal information in a variety of ways, including: directly from you, from third parties, through technologies, and when you are interacting with us online or through our mobile applications. The following are examples of the ways we collect information about you.

**Directly from you:**

You may provide personal information to us on our site, by mail, by email, over the telephone, through our websites or mobile applications or in any other direct manner.

- When you register as a user for our Services, or sign in to an existing account, as for example as a Shopper Army member for your user account and profile
- When you visit our Site or access our application(s)
- Through your survey responses in connection with market research conducted by us for Shopper Army, our affiliates or commissioned by one of our clients.
- Through your use of our websites, including [www.ShopperArmy.ca](http://www.ShopperArmy.ca) , [www.ShopperArmy.com](http://www.ShopperArmy.com) , [www.BrandSpark.com](http://www.BrandSpark.com) , [www.BestNewProductAwards.com](http://www.BestNewProductAwards.com) , [www.BestNewProductAwards.biz](http://www.BestNewProductAwards.biz), and [www.BrandSparkMostTrusted.com](http://www.BrandSparkMostTrusted.com) and their programs, as well as related internal websites, social media pages, intranet, mobile applications and other online communications
- Through phone calls, emails and/or other forms of communications with you.
- When you contact us for support
- When you participate in the Shopper Army cash back program, missions, offers or promotions
- When you enter a contest, sweepstakes, promotion offered through the Site
- When you participate in a Shopper Army survey or poll
- Connect to our Services using third-party accounts, such as your email, social media, or payment account(s)
- User-submitted content, submissions or Information that you voluntarily choose to submit or post to the Site/Service for public display, such as photos, comments, ratings, reviews, and your public profile information.
- When you indicate you are interested in receiving information about other services, contests or news with regard to Shopper Army or one of its partners

**From Third Party or Other Sources:**

Occasionally, we may receive personal information from other sources. In these cases, we receive your personal information from these other sources with your consent or if the law requires or permits us to do so. Such information may be from:

- Third parties, including affiliates, clients, service providers, social media platforms, companies with whom we have contractual relationships,
- Data brokers from which we purchase general demographic, location and other data to supplement the data we collect,
- Partners with which we offer co-branded services, distribute products, or engage in joint marketing activities, and
- Publicly-available sources such as open government databases or other data in the public domain.

**From Technologies, Website and Applications:**

We may collect personal information through various types of technologies, including, for example, anonymous analytics which allows us to track numbers of individuals and consider certain demographic information about our user base on an anonymous basis, which we may use from time to time. This data is treated as non-Personal Information, except as required under applicable law, since it is de-identified and becomes anonymous. Certain information is automatically collected electronically about you through interaction with our services, sites, email, mobile applications, social media accounts; use of our or a third party's technologies, which include cookies and other tracking technologies' and monitoring and analyzing trends, usage, and activities. This information helps us understand what actions you take on our sites and allows the sites to work correctly. This information may be combined with other information collected such as your online shopping transaction history in order to support our customer understanding using the site and to provide you with more tailored offers.

**What types of personal information do we collect?**

The information we collect sometimes includes personal data, which is information relating to identified or identifiable natural persons. Some examples of the types of information we may collect include (and much of which is optional to submit):

- Identity information, such as your first name and last name;
- Demographic information, such as date of birth, gender, country, zip code and other demographics;
- Contact information, such as your email address and sometimes your address and phone number;
- Credentials and Authentication Information, such as your username, password;
- Purchase Data, such as the product or service requested or purchased, your browsing, shopping and purchase history;
- Profile Data, such as attitudes and behaviours, interests, favourites, and other profile data.
- Content that you create, load, or share on the Service, such as survey responses, recordings, photos, videos and product reviews.
- Resume Data necessary to consider you for a job opening if you submit an application to us, including your employment history, transcript, writing samples, and references.
- You may choose to voluntarily submit other information to us through the Service that we do not request, and, in such instances, you are solely responsible for such information.

### **How do we use your information?**

#### **Manage your Account**

To register in Shopper Army you are required to submit your email. In addition, Shopper Army requires your name and address in order to send you products if you have signed up for product tester missions, and your zip code, gender and birth date are also required for payment of Cash Back and other rewards earned through Shopper Army. Personal Information you provide is used for purposes such as providing customer service, performing services requested by you, allowing you to set up a user account and profile. The information may be used to: (i) process your registration with our Services, including verifying whether your email address is active and valid and enrolling you into our program; (ii) facilitate and manage your transactions; (iii) track your shopping, any returns, deliver you rewards or payments, and identify opportunities for rewards and/or offers; (iv) send you technical notices, updates, security alerts, and administrative messages; (v) provide you with member services regarding your account and reply to your questions, comments and requests; (vi) comply with legal and regulatory provisions in force and with the competent judicial authority; and (vii) assess security risk, enhance security, prevent fraud, monitor and verify identity or service access.

#### **Improve Our Services**

In order to improve the whole Shopper Army experience and continuously create better content, new features and special offers to communicate with our members, we may process information through analyzing and monitoring usages and trends and performing statistical analyses to improve our Services and the Site, applications, marketing efforts, and the products and services of our affiliates and sponsors. We may also use this information to adapt content to be more likely to be of interest to you. We may also share information with our affiliates to analyze and monitor general usage and trends to improve theirs and our services and sites. In this way, your information can be generally integrated to develop new tools and a more effective network of services and products for the whole Shopper Army community.

#### **Provide Marketing Information**

We may use your information to provide you with more personalized offers and/or special offers, discounts and similar information. If you elect to receive marketing communications, we may send you newsletters, rewards, discounts, promotion codes, events and general information about the service if you consent. You can manage these communications in accordance with your member profile choices, or unsubscribe.

#### **Administer Contests, Sweepstakes, and Promotions**

Shopper Army may invite you as a member to enter various contests, sweepstakes, surveys or promotions. To participate, you may submit information to enter the competition or promotion. If you choose to participate in a contest or promotion, your Personal Information may be used to administer the contest, such as to determine your eligibility for the contest or to award a prize, to reach you in the event that you win a prize, and perhaps for the delivery of the prize.

### **Additional details about how we use survey research**

Your participation in our market research surveys helps our clients to understand their brands and market and produce better quality products and services. As a survey participant, your information will be used in accordance with this Policy. Where personal information collected by Shopper Army is to be used for research purposes, you will never be contacted or asked to purchase anything or directly contacted for marketing purposes based on the information you provide us or on your survey responses, unless you have provided express consent. If any information from a survey or other matters is provided to clients or third parties in aggregate form, it is impossible to identify an individual respondent's personal information. Where a respondent may have to be re-contacted for purposes of clarifying responses to a survey or to seek additional responses, and depending on the circumstances, we will retain the personal information for a period of time that is reasonably sufficient to allow this re-contact.

### **General**

We may use your information as otherwise permitted under this Policy or as otherwise authorized by you. We may use information that does not identify you (including information that has been de-identified) without obligation to you except as prohibited by applicable law.

### **How do we Share Information?**

Shopper Army does not sell your personal information to any organization or person. Without limiting the following, in our sole discretion, we may share non-personal aggregated information which does not identify you (or de-identified information about you) with third parties or affiliates for any purpose except as prohibited by applicable law. Also, such aggregate information allows us to study the general shopping habits, behaviours and patterns of our members which can provide very useful information to brands, who can then customize offers and target their media more effectively. Shopper Army members benefit when we work with brands and retailers to be able to offer our members extra and exclusive bonuses and special offers and we are also then able to share with our members the affiliate marketing commissions that we earn. The brands' offers may also show up as bonus cash back percentage offers or as offers obtained through exclusive promo codes. Members also benefit when brands sponsor special offers with Shopper Army to introduce members to their new products or bestsellers.

We may share your personal information within our **affiliates and subsidiaries** or with our service providers (companies operating on our behalf) and other third parties (companies with which we provide programs, products or services) for the purposes described in this policy and in accordance with applicable law. When we share with **our affiliates and subsidiaries** for purposes consistent with this policy - including customer support, marketing, and technical operations - they will also meet the data protection obligations contained in this policy. We may share your information, including personal information or data, under the following circumstances:

**With Service Providers** In the course of providing our programs, products, services, promotions, contests and events we may share personal information with our service providers (companies operating on our behalf). These service providers help us operate our business, technology systems and applications, internal procedures, infrastructure and advertising and marketing. We require these service providers to limit their access to and/or use of personal information to what is required to provide their services and to comply with our privacy requirements. Service providers are prohibited from using your information for any purpose other than to provide this assistance, although we may permit them to use aggregate information which does not identify you or de-identified data for other purposes.

**With our Partners** that are engaged in joint sales or product promotions. We also allow certain third parties to integrate components of our services into their own websites and apps. Please be aware that we do not control our business partners' use of such information. Our partners are responsible for managing their own use of the information collected in these circumstances. We recommend you review the privacy policies of the relevant partner to find out more about their handling of your personal data.

**With Third Parties** (companies with which we provide programs, products or services) for purposes of facilitating your requests and in connection with tailoring offers, and measuring and improving our Service and marketing effectiveness. In the course of providing certain of our programs, products and services,

we may do so through arrangements with third parties. As a result, your personal information may be collected, used and shared by us and the applicable third party. These third parties may have their own privacy policies and terms and conditions, which will govern their use of your personal information. You will be informed upon signing up for the relevant program, product or service of the third party arrangement so that you can review the relevant privacy policies that apply.

**With our Clients** in connection with our processing of your information on their behalf. For example, we share your information with our clients to conduct market research services, respond to your questions and comments, comply with your requests, brand communications, market and share offers or promotions, and otherwise comply with applicable law.

**For legal purposes**, as reasonably necessary or required to comply with law or a legal process (including a court or government order or subpoena), to detect, prevent, or otherwise address fraud, security or technical issues, to enforce this privacy policy, and to protect the rights, property or safety of Shopper Army, our users, and/or the public. If this happens, we will not share more personal information than is reasonably required to fulfill that particular purpose.

**During a corporate transaction**, such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, we reserve the right to sell, transfer or otherwise share some or all of our business or assets, including your personal data. If your personal information is required in connection with any such transactions, we will comply with the legal requirements for the disclosure of personal information and will make reasonable efforts to require the recipient to honor this privacy policy.

#### **With your Consent**

Other than the purposes listed above, we may, with your implied or express consent, share or disclose your personal information outside of Shopper Army in accordance with applicable law. Information is also shared where the respondent has consented to such disclosure. We may share your information for any other purpose with your express consent

#### **How We Manage Consent**

By registering as a member of Shopper Army and/or submitting information to us in connection with using our programs, products and services, you are providing your consent to the collection, use and disclosure of personal information as set out in this policy. In some cases, your consent may be "implied" i.e. your permission is assumed based on your action or inaction at the point of collection, use or sharing of your personal information. We will obtain consent when we want to use personal information for a new purpose or for a purpose other than those stated at the time of collection in this policy or in the terms and conditions of a specific program, product, service, contest, or promotion you signed up for, participated in or requested.

In attaining consent, Shopper Army will use reasonable efforts to ensure that a respondent is advised of the identified purposes for which personal information will be used or disclosed, and these purposes will be stated in a manner that can be reasonably understood by the respondent. Shopper Army will generally seek consent to use and disclose personal information at the same time that it collects the information. However, Shopper Army may seek such consent after the personal information has been collected but before it is used and/or disclosed for a new purpose. In determining the appropriate form of consent, Shopper Army will take into account the sensitivity of the personal information and the reasonable expectations of respondents.

Your consent can be withdrawn at any time, except in limited circumstances, including legal or regulatory requirements or as a result of your contractual obligations with us. If you choose not to provide us with certain personal information or if you withdraw your consent, where such withdrawal is available, we may not be able to offer you the programs, products, services, contests, promotions, or information that you requested or that could be offered to you.

Participation in a Shopper Army quantitative or qualitative marketing or social research study or survey or emailing a Shopper Army employee may constitute implied consent for us to collect, use and disclose personal information for the identified purposes, including communicating with the individual.

Participation by respondents in panel research, surveys, polls, missions, or other feedback (including ratings and reviews) is always voluntary. A respondent is always free to choose whether or not to participate these activities, free to choose not to answer any specific questions and free to discontinue participation at any time. When agreeing to participate in a panel survey, survey, poll, mission or other feedback a respondent gives consent to it by participating. There may also be express written consent given by the respondent. Where Shopper Army discloses information collected during such activities to a third party other than the client or partner sponsoring it or participating in it, we always explain the reason for the disclosure to the respondent and obtain express permission from the respondent before making any such disclosure. As a participant, your information will be used in accordance with this privacy policy, except that we will not share your responses with a third party for sales or marketing purposes without your express consent.

By participating as a member of Shopper Army you consent to Shopper Army being able to utilize and/or provide information or insights through the generalized aggregate data ("**User Data**") on your shopping cart preferences and shopping behaviours. This User Data may include (a) demographic information such as age, gender, and postal code, (b) information regarding the offers that the user has participated in or offers that the user has claimed or redeemed, (c) any transactional or other data that is generated, collected or obtained by Shopper Army through a collaboration pertaining to a sponsored offer. All non-personal information shared in the Site and all Shopper Army surveys will be considered non-confidential and non-proprietary and shall immediately become the property of Shopper Army.

Users of the Site may from time to time be encouraged to submit, post, email or upload survey responses, product ratings or reviews, answers, remarks, opinions, comments, information, feedback, ideas, suggestions, graphics, images, photos and other materials or user submitted content to the site, through surveys, emails, email surveys or other channels connected to the Site (collectively the "Submission"). Shopper Army will not be required to treat any such Submission as confidential, and will not be liable for any ideas for its business (including, without limitation, product or marketing ideas) and will not incur any liability as a result of any similarities that may appear in future Shopper Army operations or contents. Shopper Army will be entitled to use the Submission for any commercial or other purpose whatsoever without compensation to any person sending the Submission.

### **Protection of Your Personal Information**

Every member's critical information such as passwords are encrypted upon signup. Shopper Army does not request, collect, use, disclose, store, process or otherwise handle information about any identifiable individual Personal Information beyond what is necessary to provide the offers to members or collaborations or as prescribed by law.

We do not request, process or collect any Personal Information that is considered sensitive personal information under applicable privacy laws, including without limitation specific health information, financial/credit information, government ID numbers, or date of birth of minors. We do not gather credit card or banking information.

Shopper Army is a portal site where we guide you to the Affiliate Store online retailers and you complete your purchase transactions via these sites, so you should make sure you understand the privacy policies of any such sites where you provide your credit card or personal information.

While we do gather limited purchase order information, only authorized Shopper Army employees can view this for verification purposes and they are required to respect the confidentiality of all personal information. We endeavor to protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

We have personal information retention processes designed to retain personal information of our customers for no longer than necessary for the purposes stated above or to otherwise meet legal

requirements. Shopper Army will maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.

We will protect the personal information we collect with security safeguards appropriate to the sensitivity of the information. We take appropriate steps including technical and organizational measures designed to help protect your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. We have implemented measures designed to help protect personal information and we maintain reasonable administrative, technical and physical safeguards in an effort to protect personal information in our custody and control. Through such appropriate security measures and regardless of the format in which the personal information is held, we will protect it against risks such as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction. Unfortunately, no collection or transmission of information over the Internet or other publicly accessible communications networks can be guaranteed to be 100% secure, and therefore, we cannot ensure or warrant the security of any such information you provide to us.

### **Use of Cookies, Navigational Data and Other Technology (Passive Information Collection)**

In general, you can visit our Site without telling us who you are or submitting any personal information. However, Shopper Army might use tracking technologies owned by third party analytics providers to help us gather and analyze information about the areas visited on the Site to evaluate and improve the customer experience and the convenience of the Site, to help us evaluate some of the specific information related to Site visits, analyze use of the Service, compile statistical reports on the Service's activity, and provide us with other services relating to Service activity and internet usage. We use analytics to better understand who is using the Site, how people are using it and how to improve and enhance it. Therefore, as you navigate through this Site, some of your anonymous user information may be passively collected (which you did not actively provide) including date and time of the visit, pages of the site visited, type of browser used, the IP (Internet Protocol) address of the device, the number of clicks during a visit, screen activities, mouse movements, the type of device used, general geographic location (state or country), the advertisements or videos watched.

This Navigational Data is collected by means of "Cookies" which are small randomized characters saved by your browser which a website can use to recognize repeat users. They provide the convenience to recognize visitors, keep track of your signed in session, and more quickly provide personalized content or grant you unimpeded access to the website. With cookies enabled, you will not need to fill in information that you have already entered. Information gathered through cookies also helps us measure use of our website and this cookie data allows us to track usage behavior and compile data that we can use to improve the site. Navigational Data is not Personal Information in that we do not use it, either alone or coupled with other information, with the intent of revealing your identity. This data will be used in aggregate form; no specific users will be tracked. Generally, cookies work by assigning a unique number to the user that has no meaning outside of the website that is visited. Most browsers have a feature that allows the user to refuse cookies or issues a warning when cookies are being sent. However, our site will not function properly without cookies. Enabling cookies ensures a smooth, efficient visit to our website.

The Navigational Data is used solely for the purposes expressed in this Policy. Unless you expressly authorize us to do so, we will not share your Navigational Data with any third parties other than our partners. Even when we share the Navigational Data with our partners, they are also bound by the rights, uses and limitations disclosed in this policy. We aim to ensure that the Navigational Data is solely used per our instructions and in accordance with this policy, and all applicable laws, security measures and confidentiality requirements.

### **Third Party Sites and Services**

Our site may contain links to other sites that Shopper Army does not own or operate. Except as otherwise provided, our policy is that we will not provide any of your personal information to these third parties without your consent. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. We do not have any control over



such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information. The linked websites have separate and independent privacy statements, notices and terms of use, which we encourage you to read and familiarize yourself with and consult their privacy policies and terms of use.

### **How to Change your Privacy Choices**

Options available for you to manage your privacy preferences include, for example: managing your preferences within your account(s), contacting us directly, changing your browser settings on your device, and/or, where available, using third party unsubscribe functionality.

You may access, review, update, or remove certain information that you have voluntarily submitted to us through the Service by sending an e-mail to the e-mail address set forth in the “Contact Us” section. We may require additional information from you to allow us to confirm your identity. Please note that we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

You have the right to opt-out of any marketing or survey communications from Shopper Army. You can opt-out of receiving promotional e-mails or surveys from us at any time by following the instructions as provided in e-mails or surveys, clicking on the unsubscribe link, or e-mailing us at the e-mail address set forth in the “Contact Us” section with the word UNSUBSCRIBE in the subject field of the e-mail. Please note that you cannot opt-out of non-promotional e-mails, such as those about your account, transactions, servicing, or Shopper Army’s ongoing business relations.

### **International transfers**

Shopper Army is headquartered in Canada where privacy laws may be more protective as those in your jurisdiction. If you are accessing the Service from within the U.S., please be aware that information collected through the Service, including personal data, may be transferred to, processed, stored, and used in Canada and other jurisdictions. Your use of the Service or provision of any information constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information in the other jurisdictions as set forth in this privacy policy.

### **California**

The California Consumer Privacy Act provides California consumers with the right to obtain information about the personal information about you that we collect, use, and disclose. You can exercise your rights by contacting Shopper Army, as described below. If you choose to exercise your privacy rights, you have the right to not to receive discriminatory treatment or a lesser degree of service from Shopper Army.

### **Changes to this Privacy Policy**

This Privacy Policy is effective as of June 24, 2020. Please note that it will be updated to reflect any important changes in the way we handle your personal data or any changes in applicable laws. We suggest that you review this Policy periodically as we may update it from time to time. We reserve the right to modify this policy at any time, with or without notice to users. By using the Site or Services following any privacy policy change, you freely and specifically give us your consent to collect, use, transfer, and disclose your information in the manner specified in the then-current privacy policy.

### **How do I Request Access to my Personal Information**

Please contact us if: a) you have any questions or comments about this Privacy Policy, or how your privacy is protected at Shopper Army; b) you wish to opt-out of marketing emails, or access, update, and/or correct inaccuracies in your personal information; or c) you otherwise have a question or complaint about the manner in which we treat your personal information. Before granting your request, we may require that you confirm your identity to us.

### **Contact us**

For more information please contact us at: [info@ShopperArmy.com](mailto:info@ShopperArmy.com) or by mail at: 1 St. Clair Avenue West, Suite 503, Toronto, Ontario M4V 1K6, Attention: Privacy Officer