

## **PRIVACY AND YOUR INFORMATION: OUR APPROACH TO PRIVACY**

ATPI and its suppliers are committed to keeping personal information safe and is committed to upholding your right to privacy in accordance with all applicable laws respecting the protection of personal information. That's why we innovate ways to safeguard your privacy when utilising our services and products. We will always keep you fully informed about your data and how we use your data and for how long. Your personal data belongs to you, therefore we promise to only use it for the purposes for which you have given it to us, or for which we collected it; namely to provide you with the services and information you request or provide you with information that may be of interest to you. Unless otherwise authorized by you, ATPI and its suppliers will use personal information for these purposes only. If you do not wish to receive additional information, you may advise us accordingly.

This Policy applies to the website [www.atpi.ca](http://www.atpi.ca) as well as all related mobile applications and services that link to this Policy (collectively, the "**Website**") unless we have posted a specific Policy to a particular website or service. In that case, that specific privacy policy will apply.

This Policy covers all personal information that we collect, use and otherwise process when you interact with the Website or with us. All personal information will be processed in accordance with this Policy and with applicable laws, which can vary depending on your country of residence. If you do not agree with any provisions or changes to this Policy, please do not use the Website.

Personal information is collected, held and more generally processed by ATPI Travel and Events Canada Inc., having its international headquarters in Montréal (Québec), Canada, H2Y 1W4 and our supplier OUTBOX Technology CRB Inc., having its principal place of business in Montreal (Québec), Canada, H2X 2T7 ("**we**", "**our**" or "**us**").

### **1. INFORMATION COLLECTED**

We collect personal information under the circumstances listed below. In certain circumstances or for certain purposes, providing your personal information is voluntary (for example, when you sign up). However, in other circumstances, providing your personal information is mandatory and we may not be able to provide you with the services or products requested if you choose not to provide such information. For example, if you purchase a ticket online, some personal information is needed to be able to send you the ticket.

We collect your personal information in the following circumstances:

- When you sign up;
- When you buy a ticket or other products;
- When you interact with the digital content on the Website;
- When you participate in a contest and/or a survey;
- When you send us an inquiry or otherwise communicate with us;
- When you apply for a job;

- When you provide us with your personal information while onsite at an event, such as when you log in to the Wi-Fi network;
- When you post comments on the Website;
- When you choose to give us permission to access your information from third party websites (for example, by linking to social media networks like Facebook).

Some of your personal information may be provided by our affiliated companies and/or commercial partners, including companies that sell our tickets for shows and/or events worldwide.

- *Personal Information*

To facilitate reading, the expression "personal information" is used throughout this Policy. For interpretation purposes, this expression shall have the meaning set forth in the legislation that is applicable to you. For instance, for legal residents of the European Union, "personal information" shall be read throughout this Policy as "personal data" as defined under the *General Data Protection Regulation*. In any case, we treat any information that makes it possible to identify you as an individual as personal information. For example, we consider your given name, surname, date of birth, postal address, telephone number, e-mail address, mobile number, as well as any information that is considered personal information under applicable laws to be personal information.

We collect and process the following categories of personal information:

- Contact information, such as your given name, surname, postal address, telephone number, e-mail address;
- Economic information, such as financial information that may be provided in connection with our services (including to purchase tickets and packages to shows and/or events, to purchase gift cards);
- Login information, such as the ID and password you use to connect to your account on our Website;
- Interests and preferences information;
- Any other information that you provide directly and voluntarily, including any message you send to us by e-mail and/or by contacting our customer service.

- *Information about someone else*

If you submit information on behalf of another individual (for example a friend, a family member, a member of a tour group you are organizing), you must ensure that you have his/her consent to share his/her personal information with us and you confirm that you have this consent.

- *Children's Information*

We take children's privacy seriously. We do not knowingly collect personal information from children through the Website. If you are a minor under the laws of your country, please do not submit any personal information through the Website without the express consent and participation of a parent or guardian.

- *Personal information collected by third parties*

Our Website contains advertising and content provided by third parties who may associate themselves with us and other members of the Group. Our Website also includes hyperlinks to such third parties' websites. These third parties have privacy policies that may be different from this Policy. The information collected and stored by third parties, whether through our Website or a third party's website, remains subject to their own policies and practices, including what information they share with us, your choices on their services and devices, and whether they store information in Canada or elsewhere. We are not responsible for the manner in which your information may be collected, used, disclosed and otherwise processed by said third parties, and encourage you to familiarize yourself with and consult their privacy policies and terms of use. To the extent we combine information we receive from third parties with personal information we collect directly from you on the Website, we will treat the combined information as personal information under this Policy.

We reserve the right to modify this Policy to adapt it to any technological or legal change, to adjust it to reflect changes made to the Website or for any other purpose. All updates to our Policy will be posted on this page or otherwise mentioned to you if required by applicable laws.

## 2. INFORMATION USE

We will use the information collected from you to process the task in which you provided your data as well as help improving services on the Website, including delivering content and information to you via email or mail.

We collect and process personal information to:

- Manage the account creation process on the Website and, more generally, manage your personal account;
- Deliver the services you have requested and/or the tickets or other products you have purchased through the Website;
- Design, maintain, analyze, manage, improve, market and provide products and services via the Website;
- Help us perform transactions and verify your identity with the transaction you have requested;
- Respond to your inquiries;
- Perform quality assurance, sales, marketing and other business analysis;
- Organize contests and other promotional activities;
- Contact you in connection with shows and/or events for which you have purchased tickets (including notifying you of postponed or cancelled shows and/or events);
- Communicate with you about changes to our policies;

- Send you a customer satisfaction survey after you have attended one of our shows, where permitted under applicable laws or with your consent (if required);
- Understand your needs and interests and provide you with optimal services and personalized advertisements, services and products by performing profiling, where permitted under applicable laws or with your consent (if required);
- Improve the Website performance, respond to your requests regarding the Website, remember your Website preferences/settings;
- Send you specific information, promotional and marketing communications about us (as defined below) or third party products and services (for example, offers, discounts, ticket presale notices, newsletters and birthday communications), where permitted under applicable laws or with your consent (if required); and
- Analyze and process your application for a possible job opportunity

Data collected is held in accordance with relevant Data Protection legislation. All reasonable precautions are taken to prevent unauthorised access to your information. This safeguard may require you to provide additional proof of identity should you wish to obtain information about your account details.

**DATA PROTECTION.** a. Each Party shall comply with its obligations under this Agreement and with any laws or regulations as may now be in effect or as may hereafter be enacted, adopted, or determined to apply to the confidentiality, use, disclosure, transmittal, storage, or transportation of personal protected information. Client acknowledges and agrees that ATPI will collect, use, disclose and transfer across borders personally identifiable information of Client's Travelers ("Personal Data") and, to the extent that Client provides ATPI with Personal Data, Client agrees to ensure that Client's Travelers are given notice of the foregoing and legally consent to our collection, use, disclosure and transfer of their Personal Data through the Client's employee onboarding process or by other practicable means. ATPI will not attempt to collect, use, disclose, or transfer any Personal Data for any purpose other than as: (i) reasonably necessary to perform the Services or as otherwise necessary to perform ATPI's obligations or exercise ATPI's rights under the Agreement (including, without limitation, using Personal Data to develop reports at Client's request), or (ii) otherwise required by law. Client agrees to make available only that Personal Data which is necessary for ATPI to perform the Services, is solely responsible for the accuracy of such information, and has valid and enforceable rights to disclose Personal Data for the purposes contemplated hereunder. In the case of international transmittals including the European Union, the Confidential Information and Personal Data are further subject to Article 26(2) of the European Union Directive 95/46/EC and the General Data Protection Regulation (GDPR) (Regulation(EU)2016/679)), effective May 25, 2018. b. In order to provide the Services to individual travelers and to satisfy ATPI's obligations under the Agreement, ATPI will maintain, enhance and expand Traveler Profiles. As between ATPI and Client, Client owns the Personal Data contained in these profiles; however, the law in certain jurisdictions provides that the Personal Data contained in the Traveler Profiles are owned by the Client's Travelers. All Traveler Profile templates are ATPI's

property and ATPI reserves all rights therein. c. Both Parties will use appropriate forms of encryption or other secure technologies in connection with any transfer of communications of Personal Data. d. Client and Travelers shall use assigned user identifications and passwords to log-on to the ATPI Tools and shall not use passwords with, nor disclose passwords to, others. Client shall take all necessary measures in order for each Traveler or other user to keep his or her login and password confidential. Client must promptly inform ATPI of: (i) any user who has lost a login and password, (ii) any user who has ceased to be employed by the Client or otherwise should no longer have access to the relevant ATPI IT Tool, and (iii) any user who has misused a login and password. e. For the avoidance of doubt, Client acknowledges and agrees that (i) nothing contained in this Section will limit or otherwise affect ATPI's right to disclose information to a governmental authority (or to a third party that the governmental authority requires) to the extent required by applicable law, and (ii) nothing contained in this Section will limit or otherwise effect ATPI's right to use any data which is in an aggregate form or otherwise in a format that does not contain Personal Data.

### 3. OTHER WEBSITES

The ATPI website(s) may contain links to other websites which are outside ATPI's control and are not covered by this Policy.

The operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

### 4. TYPES OF COMMUNICATIONS

When we have your express permission, we will send you marketing communications based on the type of communications you have indicated that you want to receive.

At any time, you can update your preferences by clicking the 'unsubscribe' link in any marketing emails you receive from us. The link will always be in the footer of the email. We aim to action requests to stop being sent marketing communications within 10 working days of receiving those requests, but it is possible you will receive some marketing in the period prior to that change being made.

Please note that if you tell us that you do not wish to be sent further marketing communications, you will still receive service communications which are necessary, for example, to confirm your booking details.

#### Direct marketing and profiling

When we send or display personalised communications or content, we may use some techniques that qualify as "profiling" (i.e. any form of automated processing of personal information consisting of using the aforesaid information to evaluate certain personal aspects relating to a natural person, for example to analyse or predict aspects concerning that person's personal preferences, economic situation, interests, behaviour, location or movements).

More particularly, we may collect personal information about you in the different scenarios mentioned above, centralize this information and analyse it to evaluate and predict your personal preferences and/or interests. Based on our analysis, we then send or display communications and/or content tailored to your specific interests/needs.

You may have the right to object at any time to the use of your personal information for “profiling”. Please see “Your rights regarding your personal information” section below.

## 5. AUTOMATION

As part of our processes to deliver relevant content and information, we may use some automation to help us to process data. This includes using cookies and preferences you have selected such as area of interest, location or industry to show or contact you with information.

## 6. WEBSITE COOKIES AND LINK TRACKING

Cookies allow ATPI to provide important site functionality so you don’t have to re-enter lots of information. They also allow us to remember what links and pages have been clicked or viewed during your visit. If you have provided us with personal data, completing a form for example, we may associate this personal data with other information. This will allow us to identify and record what is most relevant to you. By using your browser controls, you are always in control of the cookies we store and access on your computer.

## 7. Access rights

- You have the right to access the personal data that we hold about you.
- You can access this information in the “MY ACCOUNT” section in the Site; or you can contact us at [infocanada@atpi.com](mailto:infocanada@atpi.com)