



STAY.PLAY. LEARN.

Privacy Policy

Smart Cookie Club Privacy Statement

The purpose of this statement is to inform our customers and other individuals we deal with, how we collect, use, disclose and protect your personal information to meet privacy principles and requirements with respect to personal information under applicable Canadian privacy legislation. Personal information is information about an identifiable individual, as more particularly described under applicable privacy legislation. This statement applies to our collection, use and disclosure of personal information in Canada. This statement does not apply to information about our employees or to information that is not personal information.

Personal Information We Collect

Smart Cookie Club, its owners, operators and employees collect personal information in a number of circumstances in the course of providing Play-based learning programs to children and their parents/caregivers. Personal information we collect includes:

- name, address, telephone number, and other contact information for parents and/or caregivers;
- name, gender, birth date and any relevant medical information regarding children registered in programs;
- transaction, registration history and purchase history;
- such other information we may collect with your consent or as permitted or required by law.

Use of Personal Information

Smart Cookie Club generally uses personal information for the following purposes:

- to communicate with you regarding the registration of your child in a Smart Cookie Club class
- to place your child in a developmentally appropriate class and to inform your child's teacher and administrator of any medical concerns regarding your child
- to communicate with you upon registration and with new information that may be of interest to you regarding your child's learning and development

- to program schedules for future seasons
- to compile statistical analysis concerning business trends
- to manage and administer financial transactions
- to maintain business records for reasonable periods
- to generally manage and administer our business
- to meet legal, regulatory, insurance, security and processing requirements; and otherwise with consent or as permitted or required by law.

We do not rent, sell or otherwise disclose information to unrelated third parties for commercial gain or benefit.

Disclosure of Your Personal Information

Smart Cookie Club discloses personal information in the following circumstances:

- to a Smart cookie Club in Canada, who conducts the business of play-based learning programs in a specific area where your child is registered.

In addition to the above, personal information may be disclosed to our affiliates (including outside of Canada) for internal audit, management, billing or administrative purposes including defending and bringing legal actions.

Service Providers

We may transfer personal information to outside agents or service providers (including our affiliates acting in this capacity) ("service providers") that perform services on our behalf, for example mailing, billing, marketing, information technology and/or data hosting or processing services or similar services, or otherwise collect, use, disclose, store or process personal information on our behalf for the purposes described in this Privacy Code. Some of these service providers may be located outside of Canada, including in the United States and your personal information may be collected, used, disclosed, stored and processed in the United States or elsewhere outside of Canada for the purposes described in this Privacy Code. We take reasonable contractual or other measures to protect your personal information while processed or handled by these service providers. While your personal information is located outside Canada it will be subject to legal requirements in those foreign countries applicable to our service providers, for example, lawful requirements to disclose personal information to government authorities in those countries.

Business Transactions

Personal information may be used by Smart Cookie Club and disclosed to parties connected with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of Smart Cookie Club or our business or assets, for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples:

- permitting those parties to determine whether to proceed or continue with the transaction;

- fulfilling reporting, inspection or audit requirements or obligations to those parties

Assignees or successors of Smart Cookie Club or our business or assets may use and disclose your personal information for similar purposes as those described in this Privacy Statement.

Our Website

Smart Cookie Club operates a website which provides information about the club and its classes offered by Smart Cookie Clubs in Canada. Smart Cookie Club's website may redirect the user to a contracted third party registration platform or other external websites to allow users to register and submit forms and payments online for Smart Cookie Club services. Users may be asked to provide personal information during the registration process.

SmartCookieClub.ca sets its own and third-party cookies to track non-identifiable information. Some non-identifiable information is retained by setting a cookie on the user's computer, which may be used to remember things such as user preferences or settings, such as the user's Location Settings, to simplify your experience for future visits. The third-party cookies will be related to Google Analytics, which is used by Smart Cookie Club to track and analyze general activity related to web traffic and user behaviour on SmartCookieClub.ca.

Smart Cookie Club's website contains links to other sites. The security and privacy policies of linked sites have not been verified by Smart Cookie Club and must be reviewed independently.

Your Consent

Consent to the collection, use and disclosure of personal information may be given in various ways. Consent can be express (for example, orally, electronically or on a form you may sign describing the intended uses and disclosures of personal information) or implied (for example, when you provide information necessary for a service you have requested). You may provide your consent in some circumstances where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose, such as by using an "opt out" option provided, if any. Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney). Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified or described in this privacy statement, if applicable, or otherwise at the time of collection.

You may withdraw your consent to our collection, use and disclosure of personal information at any time, subject to contractual and legal restrictions and reasonable notice. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide certain products or services. Note also that where we have provided or are providing services to you, your consent will be valid for so long as necessary to fulfil the purposes described in this

Privacy Statement or otherwise at the time of collection, and you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, but not limited to, maintaining reasonable business and transaction records and disclosures to Canadian and foreign government entities as required to comply with laws).

Smart Cookie Club collects, uses and discloses your personal information with your consent, except as permitted or required by law. We may be required or permitted under statute or regulation to collect, use or disclose personal information without your consent, for example to comply with a court order, to comply with local or federal regulations or a legally permitted inquiry by a government agency, or to collect a debt owed to us.

Security

We take reasonable steps to protect your personal information using physical, electronic or procedural security measures appropriate to the sensitivity of the information in our custody or control, which may include safeguards to protect against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Authorized employees, agents and affiliates of Smart Cookie Club who require access to your personal information in order to fulfill their job requirements will have access to your personal information.

Access, Correction and Contacting Us

If you wish to request access or correction of your personal information in our custody or control, you may write to SmartCookieClub@mail.com. Your right to access or correct your personal information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections. If you wish to make inquiries or complaints or have other concerns about our personal information practices, you may write to us as described above, or telephone us at 1-647-847-8245.

Privacy Statement Changes

This Privacy Statement may be revised from time to time. If we intend to use or disclose Personal Information for purposes materially different than those described in this statement, we will make reasonable efforts to notify affected individuals, if necessary, including by revising this Privacy Statement. If you are concerned about how your personal information is used, you should contact us as described above to obtain a current copy of this statement. We urge you to request and review this Privacy Statement frequently to obtain the current version. Your continued provision of Personal Information or use of our services following any changes to this Privacy Statement constitutes your acceptance of any such changes.

This privacy statement is effective as of January 2015.