Welcome to Papyrus Jewelry . We are dedicated to maintaining high standards of privacy and confidentiality with respect to the Personal Information we receive from our Registered Users and others, in accordance with our obligations under the <u>Personal Information Protection (PIPEDA)</u> and Electronic Documents Act and the Freedom of Information and <u>Protection of Privacy Act (FIPPA)</u>.

This Privacy Policy (the "Policy") applies to Papyrus Jewelry and forms part of the **Terms of Use Agreement**. The Terms of Use Agreement requires all account owners to be at least the age of majority, therefore, this policy does not discuss use of our Site or services by minors. For the purposes of this policy, "you" refers to a Registered User or other user of Papyrus Jewelry, such as 'guest'. "Registered User" means an individual who has registered an account with Papyrus Jewelry using their personal details (first name), and e-mail address and personal and/or business address and telephone contact details.

This Policy details our practices concerning the collection, use and disclosure of Personal Information provided by Papyrus Jewelry. Our obligations apply to all of our officers, employees, agents or representatives who provide services to or on behalf of Papyrus Jewelry in connection with our delivery of products, services and information, as well as our website. We urge you to read this Policy to gain a clear understanding of how we may collect, use and disclose your Personal Information in the course of our delivery of products, services or information, or in the course of your use of our website(s).

If you do not consent to the collection, use and disclosure of your Personal Information in accordance with this Policy, do not provide us with any Personal Information. You also have the right to withdraw your consent to our collection, use and disclosure of your Personal Information at any time upon reasonable, advance notice. However, you cannot withdraw your consent retroactively. It is important to note that most of our products and services can only be provided if we receive the required Personal Information from you. Consequently, should you choose not to provide us with the required Personal Information, we may be unable to offer these products and services to you.

Our privacy policy covers the following topics:

INFORMATION COLLECTED
PURPOSE OF COLLECTING PERSONAL INFORMATION
USE OF PERSONAL INFORMATION
DISCLOSURE OF PERSONAL INFORMATION
CROSS-BORDER TRANSFER OF INFORMATION
CONSENT

WITHDRAWL OF CONSENT
ACCURACY AND RETENTION OF PERSONAL INFORMATION
PROTECTION OF PERSONAL INFORMATION
ACCESS TO YOUR PERSONAL INFORMATION
COOKIES AND SIMILAR TECHNOLOGIES
LINKS TO OTHER WEBSITES
DIGITAL MARKETING
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## **INFORMATION COLLECTED**

Papyrus Jewelry collects Personal Information about those who register an account with us either through registering online, via users providing their contact information through electronic media, verbally over the telephone or in person, or, as a guest.

By accessing and browsing our website(s), you agree that we may collect, use and disclose any information we collect about you through our website(s) as described in this Policy.

A visitor to the Papyrus Jewelry website (www.papyrusjewelry.ca) is not required to reveal any information such as name, street address or telephone number until such time as it is deemed necessary by you in order to fulfill an online or verbal order. We do not passively collect this information by electronic means. To access and use exclusive portions of the site, Registered Users need to provide certain Personal information. We use the information that we gather from you in a variety of ways. For example, if you purchase an item, your shipping information will be shared with our delivery agent/s and we will use your email address to communicate with you.

We collect information when a person voluntarily registers an account, completes an online form, event registration, online survey, or through registration to access secured content. We collect, use or disclose this information in a manner consistent with this Policy. We also collect email addresses during this online/offline process. You may indicate that you do not wish to receive

unsolicited electronic communications from us. We comply with <u>'s Anti-Spam</u>
<u>Legislation (CASL)</u> with respect to the sending of commercial electronic messages.

Our web server automatically collects visitor information in the form of the visitor's domain or Internet Protocol (IP) address, as well as information about the pages being accessed, the date and time of your visit to our websites, the documents that you downloaded, the searches you performed, and the website you were on prior to visiting our website(s). We use this information to better serve visitors by managing our sites, diagnosing any technical problems, and improving the content of our website(s).

For the transfer and receipt of certain types of sensitive information such as financial information, visitors will be re-directed to a secure payment server. While we utilise the services of PayPal as our payment gateway processor, all information pertaining to your financial details are stored with PayPal and not with Papyrus Jewelry.

If conducting a transaction via E-Transfer, your issuing bank has your payment credentials, not Papyrus Jewelry . In order to utilise the services of E-Transfer within your e-mail address to your own bank account as well as the challenge answer (if required) is the only available information we would collect in order to complete the transaction of payment, and address particulars for the purposes of shipping.

We do not store nor disclose any financial information as this is handled by third party payment processors and as such any such information would be handled by that respective organisation with their own processes and protocols in place.

## **PURPOSE OF COLLECTING PERSONAL INFORMATION**

Papyrus Jewelry uses only fair and lawful methods to collect Personal Information. We collect certain information from you for the purposes of fulfilling our objectives and mandate. These purposes include:

- Communicating with our Registered Users as may be required from time to time.
- Providing services and information
- Managing our relationships with Papyrus Jewelry users and or registered members
- Distributing publications, invitations to events and programs, and other communications that may be of interest to Papyrus Jewelry users via the

form of a newsletter subscription opted in by the user of which can be cancelled at any time.

- Responding to questions and concerns
- Meeting legal or regulatory requirements
- Communicating for any other purpose for which we have the Registered Users' consent

### **USE OF PERSONAL INFORMATION**

Our use of Personal Information is limited to the purposes described in this Policy, unless we expressly tell you otherwise. We do not otherwise sell, trade, barter, exchange or disclose for consideration any Personal Information we have obtained from you.

### **DISCLOSURE OF PERSONAL INFORMATION**

As a general rule, we hold all information concerning a Registered User in strict confidence. Except in limited circumstances, we do not reveal this information to anyone unless you have expressly or implicitly authorised us to do so.

There are circumstances where the use and/or disclosure of Personal Information may be justified or permitted, or where Papyrus Jewelry is obliged to disclose information without consent. These circumstances may include:

- Where required by law or by order or requirement of a court, administrative agency or other governmental tribunal
- Where it is necessary to permit Papyrus Jewelry to pursue available remedies or limit any damages that Papyrus Jewelry may sustain
- · Where the information is public as permitted by law
- Where it is reasonable for the purposes of investigating a breach of an agreement, or actual or suspected illegal activity

### **CROSS-BORDER TRANSFER OF INFORMATION**

Papyrus Jewelry may transfer Personal Information to a service provider which is located outside of where privacy laws may offer different levels of protection from those in . Your Personal Information may also be subject to access by and disclosure to the local courts, law enforcement and national security authorities under the applicable foreign legislation.

## **CONSENT**

By providing your Personal Information to us, you agree that we may collect, use and disclose it in accordance with this Policy and as otherwise permitted or required by law. However, we may seek your consent to use or disclose Personal Information after it has been collected in cases where we wish to use or disclose the information for a purpose not previously identified or expressed in this Policy.

### **WITHDRAWAL OF CONSENT**

You may withdraw your consent to us collecting, using and disclosing your Personal Information at any time, subject to reasonable notice and any legal and/or contractual restrictions.

You may, at any time, ask us not to send you further marketing materials about our services. If you do not wish to receive further communications, you may unsubscribe or contact us as set out in the Contact Information section below and ask that we not contact you for these purposes.

## **ACCURACY AND RETENTION OF PERSONAL INFORMATION**

We endeavour to ensure that any Personal Information provided to us and in our possession is accurate, current and complete. If we become aware that Personal Information is inaccurate, incomplete, or, out of date, we will revise the Personal Information and, if necessary, use reasonable efforts to inform third parties. We do not actively maintain information of former Registered Users and, for as long as we hold that information, we cannot assure the information is accurate.

We keep your Personal Information of a Registered User's relationship with us, but it will only be held as long as it is necessary for us to communicate with you or to have sufficient information to respond to any issues that may arise. When we no longer require your Personal Information, we have procedures to securely destroy, delete, erase or convert it into an anonymous form.

### PROTECTION OF PERSONAL INFORMATION

We audit our procedures and security measures from time to time to ensure that they remain effective and appropriate.

A "breach of security safeguards" is defined as the loss of, unauthorised access to or unauthorised disclosure of personal information resulting from a breach of an organisation's security safeguards or from a failure to establish those safeguards.

In case of a breach of security safeguards involving your Personal Information under our control, we will notify you and the appropriate Privacy Commissioner(s) if it is reasonable in the circumstances to believe that the breach creates a real risk of significant harm to you, including physical, financial or reputational harm. We will also notify any other organisation or government institution that can reduce the risk or mitigate the harm from the breach.

#### **ACCESS TO YOUR PERSONAL INFORMATION**

You have the right to access and review the Personal Information we hold about you. We will endeavour to provide the information in question within a reasonable time. When we will not or cannot disclose information, we will provide the individual making the request the reasons for non-disclosure.

Despite our efforts, errors sometimes do occur. If you identify any Personal Information that is out-of-date, incorrect or incomplete, please contact us and we will make the corrections promptly. We will also use every reasonable effort to communicate these changes to other parties who may have inadvertently received incorrect or out-of-date Personal Information from us.

We will not charge you for verifying or correcting your Personal Information.

# **COOKIES AND SIMILAR TECHNOLOGIES**

## **COOKIES**

In browsing the Internet, you will encounter a technology called "cookies", which are small data files that are saved to your device when you visit our website(s). These are commonly used to provide you specific information from a website, and to provide the website's operator information about you. We may use both session cookies and persistent cookies. A session cookie is a temporary file which is only active while you are on the website and is erased once you close your browser. Unlike a session cookie, a persistent cookie is not deleted when you close your browser and will remain on your device indefinitely.

These cookies are used to improve navigation on websites and to collect aggregate statistical information. This information may be used for advertising and marketing initiatives after you conclude your session on the Papyrus Jewelry website. The cookies may also track your activity on other websites or social media platforms that you visit after leaving the Papyrus Jewelry website. You may opt out of such tracking by adjusting the cookie settings on your browser.

### **ADJUSTING COOKIE SETTINGS ON YOUR BROWSER**

Most Internet browsers are initially set to accept cookies. If you do not wish to accept cookies, you can set yours to refuse cookies or to alert you when cookies are being sent. However, doing so may prevent you from accessing all or part of our websites. If you wish to disable cookies on your browser, or be prompted prior to a cookie being loaded, you can do so by adjusting your browser's settings. Consult each individual browser's "help" feature for more information related to your own personal device/s being used.

### **LINKS TO OTHER WEBSITES**

Our websites may contain links to other sites. This Policy only applies to Personal Information that we collect, use and disclose. We are not responsible or liable for the privacy practices of third parties, and we strongly recommend that you review their privacy policies before you disclose Personal Information to them.

### **DIGITAL MARKETING**

From time to time, we may use cookies to track Papyrus Jewelry 's Newsletters you are opening and reading. We may also track the email links you are opening and reading, and other related information. This information helps us promote targeted goods and services to you. You may opt out of such tracking by adjusting the cookie settings on your browser. However, note that you cannot opt out of such tracking retroactively.

## **ELECTRONIC COMMUNICATIONS**

Email is our preferred method of communicating with you and others. Unless you object, we may use plain text or HTML-based emails that may and/or not be encrypted when communicating with you. These emails, and other electronic communications from us, may contain information that is confidential or privileged, unless you instruct us not to send such information electronically.

While we make every effort to secure all electronic communications within our control, there are inherent risks involved with exchanging information electronically. For example, third parties may accidentally or deliberately intercept this information. We are unable to accept responsibility or liability for any damages you may suffer as a result of the interception, alteration or misuse of information during electronic exchanges.

### **POLICY CHANGES**

This Policy is in effect as of July 26, 2021. From time to time, we may review this Policy. We reserve the right to change this Policy, and any of our policies or

procedures concerning our practices for handling Personal Information, at any time and without any prior notice.

In the event of changes to this Policy, we will post a notice on our website at **papyrusjewelry.ca**. Policy changes will apply to the information collected from the date of posting to the Papyrus Jewelry website, as well as to existing information in our records.

### **PRIVACY CONCERNS**

We will promptly respond to questions and concerns relating to our Personal Information handling practices and this Policy and do our utmost to resolve your concerns. In every instance, we will consider our obligations with respect to your information, as well as our separate obligations under applicable privacy legislation. We may need to ask you for Personal Information to verify your identity.

Please direct your questions or concerns to us at the Contact Information listed below.

If we are unable to resolve your concerns to your satisfaction, you may contact the Privacy Commissioner of by writing to:

# The Privacy Commissioner of

30 Victoria Street Gatineau, Quebec K1A 1H3

#### CONTACT INFORMATION

In the event of questions about:

- i. Access to your Personal Information;
- ii. Our collection, use, management or disclosure of Personal Information; oriii. This Policy

Please contact Papyrus Jewelry by email using the contact form provided on the website https://papyrusjewelry.ca/index.php?rt=content/contact