

## PRIVACY POLICY

Welcome to **Camp Tawingo**! We want you to be familiar with how Jack Pearse Ltd or Tawingo (“**Tawingo**”, “**us**”, “**we**”, or “**our**”) collect, use, transfer and disclose your personal information. This Privacy Policy (“**Policy**”) applies to the personal information that we collect through your use of our website (tawingo.net), our Camp Brain web application, created and hosted by BrainRunner (the “**Platform**”), and through any other interactions you have with us.

**By clicking “I Agree”, by registering for an account and using our Platform, or otherwise signaling your acceptance or interacting with us, you consent to the collection, use, transfer and disclosure of your personal information by Tawingo in accordance with the terms of and for the purposes set out in this Policy, as they may be amended from time to time.**

Please review this Policy periodically.

## SUMMARY OF PRIVACY POLICY

**We may collect the following personal information when you provide it to us, register for an account and use our Platform, send us emails, inquiries or requests, or as otherwise stated in this Policy:**

- Name
- Address
- Postal Code
- Phone Number(s)
- Email Address
- Date of Birth/Age
- Gender
- Preferred gender pronouns
- Current technical certifications (i.e. swimming, first aid, boater’s license, Workplace Hazardous Materials Information System, etc.)
- Name of school and grade
- Cabin-mate requests
- Camper interests, concerns, proclivities, ability levels (e.g., swimming)
- Payment Card Number
- Payment Card Expiry Date
- Payment Card CVV
- Personal Health Information
- Photographs
- Name of Organization
- Affiliation to Organization
- Family status (separated, etc./custody arrangements)

**We use cookies and Google Analytics to collect Platform usage information, which is aggregated into statistical reports which we use to optimize Platform content and user experience and improve our Platform’s functionality.**

**We may use your personal information for the following purposes:**

- to determine camper eligibility
- to participate in camp activities
- to determine employment eligibility
- to provide you with access to and use of our Platform and loyalty program;
- to provide you with support and handle inquiries;
- to improve functionality of the Platform and loyalty program;
- to facilitate payment through our payment processors (e.g. Visa, Mastercard, PayPal, Bambora, Shopify);
- to communicate with you about our Platform (e.g. including updates);

- to ensure that our Platform remains functioning and secure;
- to maintain relationships with alumni and Tawingo's community by communicating with current and alumni campers and staff and organizing events;
- to engage in marketing and promotional activities;
- to investigate, prevent or act on any illegal activities;
- and to comply with any applicable law and assist law enforcement agencies as required or permitted by law.

**We may permit access to, or transfer and/or disclose your personal information to the following parties:**

- Internally, Tawingo staff who require access to your personal information for the provision of services to you, including but not limited to: Directors, Administrators, Leadership Coordinators, Food Service Staff, Circle Directors, Counsellors, Tawingo Leadership Course Participants (our substitute counsellors), Health Centre Staff, as needed to deliver the services;
- The following advertising, marketing and analytics service providers:
  - Google Analytics (<https://google.com/ads/preferences>);
  - Facebook (<https://www.facebook.com/policy.php?ref=pf>)
  - Mailchimp (<https://mailchimp.com/legal/privacy/>)
- Our payment processors:
  - Visa ([https://www.visa.ca/en\\_CA/legal/global-privacy-notice.html](https://www.visa.ca/en_CA/legal/global-privacy-notice.html)),
  - Mastercard (<https://www.mastercard.ca/en-ca/about-mastercard/what-we-do/privacy.html>),
  - Bambora (<https://www.bambora.com/en/ca/privacy-policy/>)
  - Shopify (<https://www.shopify.com/legal/privacy>)
  - Square (<https://squareup.com/ca/en/legal/general/privacy>)
- Other individuals or organizations who are our service providers, advisors or consultants. We require that our service providers maintain your personal information in confidence and solely for the purposes of providing services to us. This may include, for example, maintaining, reviewing, and developing our systems, procedures and infrastructure including testing or upgrading our computer systems, or providing hosting services, including Camp Brain (also known as BrainRunner) (<https://campbrain.com/olrprivacy/#:~:text=The%20policy%20will%20apply%20to%20and%20protect%20Personal,email%20address%29%20and%20business%20phone%20and%20fax%20numbers>) and Jaspersoft ([https://www.tibco.com/company/privacy?\\_ga=2.153826872.123118827.1636743301-1620785212.1636743301](https://www.tibco.com/company/privacy?_ga=2.153826872.123118827.1636743301-1620785212.1636743301))
- Our shipping couriers:
  - Canada Post (<https://www.canadapost-postescanada.ca/cpc/en/our-company/about-us/transparency-and-trust/privacy-centre.page>)
  - Francotyp Postalia (<https://moca.fp-francotyp.ca/M1Shipping/disclaimer>)
  - Purolator (<https://www.purolator.com/en/privacy-statement>)
  - FedEx (<https://www.fedex.com/en-ca/privacy.htm>)

**Cookies:**

Cookies Settings and Preferences. You may disable cookies and other tracking technologies through the settings in your browser. While doing so may negatively affect your experience with the use of our Website and Services, it will not prevent us from transacting with you.

**Contact Us:**

For more information about our Policy, our privacy practices, to submit a complaint, or to obtain access to or correction of your personal information, please contact our Privacy Officer at:

**privacy@tawingo.net**  
**1844 Ravenscliffe Rd.,**  
**Huntsville, ON P1H 2N2**

## FULL VERSION OF PRIVACY POLICY

### TYPES OF PERSONAL INFORMATION COLLECTED AND HOW WE COLLECT IT

Personal information means any information about an identifiable individual, which means any information that relates to you and identifies you personally, either alone or in combination with other information, and includes personal health information. Personal information may or may not include business contact information, depending on the purposes for which it is collected and the laws applicable in that jurisdiction.

We may collect the following types of personal information from you. This information may relate to you, or to your minor child whom you are seeking to register for Camp. If you are providing us with the information of a minor child, you confirm that you are the child's parent, guardian, substitute decision maker, or are otherwise authorized in writing to consent to our collection, use and disclosure of the child's personal information and personal health information.

- **Information You Provide to Us:** We collect personal information that you voluntarily provide to us when you complete the application form (either camper or staff), such as your (or that of your minor child) first and last name, address, telephone number, email address, date of birth, gender and preferred gender pronouns, school name and grade, current technical certifications (e.g. swimming, first aid, etc.), credit card information, medical health information, and family status. We may occasionally request from you and you may otherwise voluntarily provide us with additional information which personally identifies you. This may include, for example, photographs used for participation in camp activities, promotional purposes on social or print media or information collected through engaging with user support, telephone conversations, and email correspondence. We do not post the names of campers or any additional identifying information (other than what is listed above) in any of our promotional material.
  
- **Automatically Collected Information:** We collect and use certain information and data regarding your access to and use of our Platform. When you visit our Platform via a web browser, our servers record the information that your browser automatically sends whenever visiting or using a website, including but not limited to information about a computer, including IP address, the type of operating system and browser, used, and computer's location, what pages are visited on our site and what links are clicked on, what other sites an individual visited recently, service provider, traffic source, referral site, time of day, and language.
  - **Cookies:** More specifically, we use cookies to collect usage information when you visit our Platform and to improve Platform functionality. Cookies are small text files placed on your hard drive that assist us in providing a more customized Platform experience. Cookies help us to enhance functionality and navigation for users, to count users and to recognize users, and to personalize the services and improve your experience.
  - **Disabling Cookies:** If you wish to disable cookies, please refer to your browser help menu to learn how to disable cookies. Please note that if you disable cookies, you may be unable to access some customized features on our Platform, however disabling cookies will not prevent you from transacting with us.
  - **Google Analytics:** We use Google Analytics on our Platform. Google Analytics allows us to analyze and enhance how you interact with our Platform. For more information on how Google Analytics collects and processes information, as well as how you can control the information sent to Google, please review Google's site "How Google uses data when you use our partners' sites or apps" located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

Google Analytics also uses cookies to collect standard internet log information and visitor behaviour information. The information generated by Google Analytics cookies about your use of our Platform (including your IP address) is transmitted to Google and compiled into aggregated statistical reports that are used by **Tawingo** to optimize Platform content. You may

control your advertising preferences or opt-out of certain Google advertising products (i.e. the Google Analytics cookies) by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>.

Google Analytics is further linked to additional marketing sites such as Facebook, Mail Chimp, and Shopify. More information about these media sites and their privacy policies is listed below.

- **User Communications:** When you send email or other communications to us, we may retain those communications in order to process your inquiries, respond to your requests and improve the Platform.

## WHY WE COLLECT PERSONAL INFORMATION

We collect your personal information in order to provide you with access to and use of our Platform; to provide you with support and handle inquiries; to improve functionality of the Platform; to facilitate payment through our payment processors (e.g. Visa, Mastercard, PayPal, Bambora, Shopify); to communicate with you about our Platform and services, including updates; and personal communication regarding special occasions and upcoming events; to ensure that our Platform remains functioning and secure; to investigate, prevent or act on any illegal activities; and to comply with any applicable law and assist law enforcement agencies as required or permitted by law.

We also collect personal information to assess camper and employment eligibility, as well as for your participation in camp activities. For example, we take photographs for our end of session-slide show, which is only shown to the campers and staff present on banquet night. We also use photographs for promotional purposes on social or print media.

## HEALTH CENTRE & PERSONAL HEALTH INFORMATION

**Tawingo** acts as an agent to the registered nurses on staff that operate out of its Health Centre as it relates to the collection, use and disclosure of personal health information of the campers that access services at the Health Centre. The registered nurses are Health Information Custodians, as described under Ontario's health privacy law. In this respect, **Tawingo** may:

- Facilitate the collection of the personal and medical history of campers on behalf of the registered nurses (for example, via the Tawingo Health Centre Consent to Treatment Form).
- Broker and make available records management software, including online software for camper health records.

Furthermore, **Tawingo** provides the registered nurses in the Health Centre with the emergency and safety information provided upon a camper's enrolment at **Tawingo**: including, but not limited to, emergency contact information and information about allergies, asthma, diabetes, epilepsy and food intolerances or special diet. Once a registered nurse accesses this information to assess/treat a camper, that assessment becomes part of the healthcare professional's health record and is governed by Ontario's health privacy law. The registered nurses will disclose personal health information to **Tawingo** in accordance with the *Personal Health Information Protection Act*.

The registered nurses at the Health Centre maintain records of you and/or your camper's visits to the Health Centre when you require care. This information is kept separate and apart from your school records and other information you provide to **Tawingo** staff. **Tawingo** staff cannot access your medical information, unless disclosure is otherwise permitted under the *Personal Health Information Protection Act*.

To ensure the consistency and availability of camper health records to campers throughout their time at **Tawingo**, in the event a Health Information Custodian resigns, retires or is terminated, transfer of the health record would be made to an existing or newly engaged registered nurse and newly designated Health Information Custodian, following notification to the camper or their parent/guardian.

## CONSENT

As required by applicable law, **Tawingo** will obtain your consent before, or when, we collect, use, transfer and/or disclose your personal information. Your consent may be express or implied when you provide us with your personal information with knowledge as to how we will use it. **By clicking “I Agree”, by completing an application form and using our Platform, or otherwise signaling your acceptance or interacting with us, you consent to the collection, use, transfer and disclosure of your personal information by Tawingo in accordance with the terms of and for the purposes set out in this Policy, as they may be amended from time to time.** Otherwise, where required by applicable law, **Tawingo** will obtain your consent to collect, use, transfer, or disclose your personal information for any new and additional purpose, as required by law.

**Tawingo** seeks additional express consent when a health information custodian is required to disclose personal health information to an individual who is not a health information custodian, or to an individual who is a health custodian, but disclosure is not for the purpose of providing health care.

At any time, subject to legal and contractual restrictions, you may withdraw your consent to our further use of your personal information, however, your withdrawal may not operate retroactively if we have already use or disclosed your personal information for the purposes stated in this Policy or as otherwise notified to you.

Our Platform can only be offered if you provide us with personal information (i.e. in order to register). If you choose not to provide us with the required personal information, you will not be able to access or use our Platform. Please note that if you withdraw consent to our processing of data that is necessary for us to provide our Services, we will no longer be able to provide them to you. We will inform you of the consequences of the withdrawal of consent, if applicable.

Under certain exceptional circumstances, **Tawingo** may have a legal duty or right to collect, use or disclose your personal information without your knowledge or consent, for example, we may disclose personal information:

- for the purposes of completing a business transaction, such as a sale of our business, merger, amalgamation or similar transaction;
- for law enforcement purposes;
- for the purpose of complying with a legal requirement;
- where 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;
- where it is necessary to permit us to pursue available remedies or limit any damages that we may sustain; or
- for such other purposes as are permitted or required by applicable law.

## SHARING YOUR PERSONAL INFORMATION

**Tawingo** may allow access to, or transfer or disclose your personal information to the following parties:

- Tawingo internal staff, including but not limited to: Directors, Administrators, Leadership Coordinators, Food Service Staff, Circle Directors, Counsellors, Tawingo Leadership Course Participants, Health Centre Staff, where access to your personal information by such individuals is necessary to provide you with our services.
- The following advertising, marketing and analytics service providers:
  - Google Analytics (<https://google.com/ads/preferences>);
  - Facebook (<https://www.facebook.com/policy.php?ref=pf>)
  - Mailchimp (<https://mailchimp.com/legal/privacy/>)
- Our payment processors:
  - Visa ([https://www.visa.ca/en\\_CA/legal/global-privacy-notice.html](https://www.visa.ca/en_CA/legal/global-privacy-notice.html)),

- Mastercard (<https://www.mastercard.ca/en-ca/about-mastercard/what-we-do/privacy.html>),
  - Bambora (<https://www.bambora.com/en/ca/privacy-policy/>)
  - Shopify (<https://www.shopify.com/legal/privacy>)
  - Square (<https://squareup.com/ca/en/legal/general/privacy>)
- Individuals or organizations who are our service providers, advisors or consultants; including, for example, individuals or organizations who are, or may be, involved in maintaining, reviewing, and developing our systems, procedures and infrastructure including testing or upgrading our computer systems, or providing hosting services, including Camp Brain (<https://campbrain.com/olrprivacy/#:%E2%80%94;text=The%20policy%20will%20apply%20to%20and%20protect%20Personal,email%20address%29%20and%20business%20phone%20and%20fax%20numbers>)

## STORAGE, CROSS-BORDER TRANSFER AND SAFEGUARDING YOUR PERSONAL INFORMATION

Information that we collect is stored via Google Cloud using physical, technical and organizational security procedures and practices (e.g. secure login and encryption technology) in an effort to protect information from unauthorized access, destruction, use, modification, or disclosure. Google Cloud servers may store information in United States, Chile, Finland, Belgium, Singapore, Ireland, Denmark and/or Taiwan. Information is also stored on protected hard drives and physical copies are securely stored in our facilities.

We further protect personal information by restricting access to it to those employees and representatives that require access to the information in order to provide our Platform and services. Please note that confidentiality and security can never be 100% assured when information is transmitted or stored electronically.

**Tawingo** may transfer personal information to a service provider which is located outside of Canada where privacy laws may offer different levels of protection from those in Canada. Your personal information may also be subject to access by and disclosure to law enforcement agencies under the applicable foreign legislation.

## RETENTION OF YOUR PERSONAL INFORMATION

We keep your personal information only as long as necessary to fulfill the purpose for which it was collected and to meet our legal and contractual obligations. The length of time we retain information varies, depending on the purpose for which it was collected and the nature of the information. This period may extend beyond the end of your relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date.

We will destroy, erase or make anonymous documents or other records containing personal information when it is reasonable to conclude that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes. We will take due care when destroying personal information so as to prevent unauthorized access to the information.

## MANAGING YOUR INFORMATION

- **Access.** **Tawingo** permits the reasonable right of access to your personal information. Upon written request and authentication of identity, we will provide you with access to your personal information under our control, subject to any legal requirements and applicable exceptions to the right of access. Where an access request is refused, we will notify you in writing and provide our rationale for refusal along with a list of next steps available to you.
- **Accuracy.** If you demonstrate the inaccuracy or incompleteness of personal information, we will amend the information as required. If appropriate, we will send the amended information to third party service providers to whom the information has been disclosed.

Depending on your use of our Platform, you may have the following choices:

- **Cookies Settings and Preferences.** We use “cookies” to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Website and Services. Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer’s hard drive.
- You may disable cookies through the settings in your browser. While doing so may negatively affect your experience with the use of our Platform, it will not prevent us from transacting with you.
- **Opt-Outs.** You may contact us to opt out of the use or sharing of your personal information for marketing purposes.
- **Online behavioural advertising.** We use Google Analytics on our Platform. For more information on how Google Analytics collects and processes information, as well as how you can control the information sent to Google, please review Google’s site “How Google uses data when you use our partners’ sites or apps” located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You may control your advertising preferences or opt-out of certain Google advertising products (i.e. the Google Analytics cookies) by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>.

## LINKS TO THIRD PARTY SITES

We may provide links to, or automatically produce search results for, third-party websites or resources, or third-party information referencing or linking to third-party websites or resources. **Tawingo** has no control over such third-party websites and resources, and you acknowledge and agree that **Tawingo** is not responsible for the content or information contained therein. When you follow such a link, you are no longer protected by our Policy, and we encourage you to read the privacy statements or other disclaimers of such other parties. **Tawingo** is not responsible for the privacy or security practices or the content of external websites, services or products.

In addition to our Platform, **Tawingo** also engages with Vimeo, Twitter, Instagram, and Facebook. When you access such social media sites your data will be collected by the respective social media site. As the Platform provider, we have no direct knowledge of the content of the data transmitted or how it will be used by social media platforms Vimeo, Twitter, Instagram or Facebook other than marketing reports rendered to us. **Tawingo** has no control over Vimeo, Twitter, Instagram, or Facebook’s practices, websites or resources and you acknowledge and agree that **Tawingo** is not responsible for the content or information contained therein. For more information on Vimeo, Twitter, Instagram, and Facebook’s privacy practices, please review their respective privacy policies: Vimeo: <https://vimeo.com/privacy/california-privacy> Twitter: <https://twitter.com/en/privacy>; Instagram: <https://help.instagram.com/519522125107875> Facebook: <https://en-gb.facebook.com/policy.php>

## CHILDREN

In order to use the Platform, you must register for and maintain an active account. You must be at least 16 years of age to obtain, maintain, and use an account. Accordingly, **Tawingo** does not knowingly permit persons under the age of 16 to register for an account and use our Platform, and does not knowingly collect or solicit personal information of such individuals.

If you are consenting to the collection, use, and disclosure of a minor’s personal information and personal health information, you confirm that you are the child’s parent, guardian, substitute decision maker, or otherwise authorized in writing (as may be required by applicable law) to grant consent.

## HOW TO CONTACT US FOR QUESTIONS, COMMENTS OR COMPLAINTS

**Tawingo** responds in a timely manner to your questions, concerns and complaints about the privacy of your personal information and our Policy and procedures.

Please contact our Privacy Officer by emailing us at [privacy@tawingo.net](mailto:privacy@tawingo.net) or at:

**1844 Ravenscliffe Rd.,  
Huntsville, ON P1H 2N2**

Please note that if we are unable to resolve your privacy concerns, you may have the right to complain to the [Office of the Privacy Commissioner of Canada](#) or the appropriate provincial Information and Privacy Commissioner.