

PRIVACY POLICY

This Privacy Policy forms part of and is incorporated into the Subscription Spot Terms and Conditions (the “Subscriber Agreement”), and the capitalized terms in this Privacy Policy are as defined herein or in the Subscriber Agreement.

When you browse, use or download information from Subscription Spot with or without signing in, WCLC’s servers automatically collect standard information for traffic monitoring and statistical purposes. This information is analyzed for operational trends, performance and in order to improve the website. Only aggregated data from these analyses, not individual data, will be used for these purposes. Examples of this traffic information includes, but is not limited to, the following:

- Internet Protocol (IP) addresses of the devices (computers, mobile devices, etc.) used to access the website.
- The operating system and the type and version of browser used to access the website;
- Device-specific information (such as your hardware model, operating system version, unique device identifies, and mobile network information);
- The internet service provider you use to visit the website;
- The dates and times you accessed the website;
- The pages you visited; and
- The names and sizes of files you requested.

WCLC will not seek to match unidentified IP addresses to identifiable individuals, unless we are required by law to do so or we are investigating detected or suspected security breaches or other illegal behaviour, and we need to do so in order to carry out the investigation.

This website uses both session ID cookies (to make it easier for you to navigate the site) and persistent cookies. Persistent cookies are required to identify and save your local time zone and viewing preferences including language preferences. Most cookies stored on your computer will expire immediately upon exiting the site, however, some cookies will remain on your computer until they are deleted.

You may refuse the use of cookies and cookies stored on your computer can be manually deleted (or in some cases automatically deleted) using the tools provided by your Internet browser (please refer to your Internet browser’s “help” file for instructions.) If you choose not to allow cookies, you may still access Subscription Spot, but you may experience reduced functionality. By not refusing the use of cookies through your browser and by using this website, you consent to the use of cookies and the processing of data from those cookies as set out above. No personal information is collected through Subscription Spot without your prior consent. WCLC collects your personal information when you voluntarily communicate with us through Subscription Spot, through the Subscription Spot Registration process to open and maintain an Account, when you sign in and use Subscription Spot, including making purchases through your Account, and through the applicable Prize claim processes. As part of setting up and/or maintaining an Account on Subscription Spot, WCLC will ask for personal information like your name, date of birth, gender, language preference, email address, telephone number, address, credit card, banking information and other user preferences. When you sign in and use Subscription Spot transactional and use information is collected such as your requested purchases and Account activities. Subscription Spot also collects your specific location information such as your IP address and location coordinates when you sign in and as part of the Account registration process.

We will use your personal information for the following purposes:

- To administer and operate Subscription Spot, including to register Subscribers;
- To verify that you meet the registration requirements for Subscription Spot which includes accessing your credit file (only for identity verification and not as a credit check. This will not affect your credit rating or credit score);
- To identify you and to authenticate and distinguish you and your Account from that of othersers/Subscribers;
- To communicate with you about your Account;
- To provide, maintain, protect and improve our services;
- To send electronic communications to you in accordance with your communication preferences;
- To resolve disputes and enforce our agreements, including the Subscription Agreement, and to comply with applicable legal requirements and protect our legal rights;
- To confirm that you are a resident of WCLC’s authorized jurisdictions and to confirm physical location to ensure you are physically located within WCLC’s authorized jurisdictions when required;
- To provide you with customer service and, generally, respond to inquiries;
- To customize the content and delivery of our products, services and marketing;
- For research and data analysis purposes;
- To maintain the security of Subscription Spot, including conducting security investigations;
- to investigate Prohibited Activities, including suspected Prohibited Activities, and to report such activities to third parties WCLC determines to be appropriate in the circumstances including law enforcement agencies;
- To improve the operations of Subscription Spot and to improve how we communicate with you;
- To process, validate, investigate and publish prize claims (including publication of your name, recent photograph, amount won and place of residence) if you become a winner, in accordance with the Subscriber Agreement and the applicable Rules;

- To process payments related to your transactions on Subscription Spot (taking into account our desire to prevent fraudulent, unauthorized or ineligible financial transactions), and to investigate financial transactions as permitted by law or as set out in the Subscriber Agreement (e.g., fraud, credit card or other chargebacks).
- To assist WCLC and its service providers for the above noted purposes as deemed necessary or advisable by WCLC.

WCLC sometimes retains third parties to assist us in order to provide the Subscription Spot services. WCLC may disclose your personal information to such service providers acting on behalf of WCLC in relation to the general purposes outlined above and in order to perform processing and other specialized services, including, data processing and storing, verification of residency and age, and payment processing. If you sign up for an Account on Subscription Spot, WCLC may also disclose your personal information to service providers such as financial/banking institutions or credit card providers. These third party service providers are located inside and outside of Canada, and/or store and access information both inside and outside of Canada and are given only the information necessary to perform the specific services they are providing to WCLC.

WCLC has security measures in place to attempt to protect against the loss, misuse and alteration of your user data and personal information under our control. WCLC keeps such information in secure facilities, protected from unauthorized access. Only persons who have a need to know your personal information for the purposes described in this Privacy Policy have access to the user data you choose to provide to us. WCLC has imposed strict rules on WCLC employees who have access to the databases that store user personal information or to the servers that host our services. While we cannot guarantee that loss, misuse or alteration to data will not occur, we make reasonable efforts to prevent such occurrences.

WCLC will retain your personal information for as long as your Account is active and as needed to provide services to you. If you decide to cancel your Account or if we need to cancel your account (e.g. if you are not complying with the terms of the Subscriber Agreement), we will retain and limit use of your information as necessary to comply with the applicable retention periods, our legal obligations, to resolve disputes and to enforce agreements.

Upon your written request, subject to specific exceptions, WCLC will provide you with access to your personal information. We reserve the right to charge a reasonable fee for providing it. To access or amend your personal information, you can contact our privacy officer as described below.

With respect to communicating with us over the Internet, although WCLC takes steps to prevent unauthorized access to the information maintained by WCLC, please note that Internet communications are inherently not absolutely secure and accordingly we cannot guarantee that the information you send to us will not be intercepted, collected and misused by others without your consent.

This website may contain links to websites maintained by third parties. The linked sites are not under the control of WCLC, and WCLC is not responsible for the contents of, or the privacy practices of, any linked site or any link contained in a linked site. WCLC provides these links only as a convenience, and the inclusion of a link does not imply endorsement of the linked site by WCLC.

WCLC may update this privacy policy from time to time to reflect changes to its information practices. You are encouraged to periodically review this privacy policy for the latest information.

This website's privacy policy is an implementation of, and is subject to, WCLC's general privacy policy. A copy of WCLC's general privacy policy can be obtained by contacting WCLC at privacyofficer@wclc.com.