

INTRODUCTION

King High Line believes the protection of personal information is an important priority. We are committed to complying with the Personal Information Protection and Electronic Documents Act (PIPEDA), as well as doing our part to inform our clients of the privacy issues surrounding online projects. The following is our privacy policy, which outlines how we will comply with PIPEDA and the ten founding principles contained in Schedule 1 of PIPEDA. This privacy policy governs www.kinghighline.com and all event websites produced.

1. ACCOUNTABILITY

King High Line understands it has a responsibility to protect the personal information under its control. We have implemented several personal information handling policies and procedures to ensure this protection. We will also use contractual or other means, to ensure any third party we share information with has adopted appropriate measures, or better, procedures and policies in place to handle its information protection responsibilities. To oversee compliance with PIPEDA, King High Line has designated First Capital Realty Inc. and Circus Strategic Communications Inc. They can be contacted as follows:

First Capital Realty Inc.

Attn: Privacy Officer

85 Hanna Avenue, Suite 400

Toronto, Ontario M6K 3S3

T: 416-504-4114

Circus Strategic Communications Inc.

Attn: Privacy Officer

14 Wesleyan St.

Georgetown, ON

T: 905-8738426

Any questions, comments, requests, or complaints regarding our privacy policy, personal information handling procedures, or our compliance with PIPEDA and Schedule 1 of PIPEDA should be directed to the designated officer.

2. IDENTIFYING PURPOSES

Contact Forms

King High Line collects personal information through its website supporter form. Information collected from this form is used for such things as marketing, research and customer relationship management. Participants who fill out this form can select a checkbox to indicate that they are interested in joining our mailing list for future mailings. Individuals may choose to unsubscribe from this mailing list from an unsubscribe email link in the actual mailing or by emailing info@kinghighline.com. Information that is collected is kept in electronic form on our servers and/or in hard copy form under secure access. A supporter's First name, last name (and support message or logo, if desired) are displayed publicly at kinghighline.com This information is only disclosed to the owners and employees of First Capital Realty Inc. and Circus Strategic Communications, who manage the database.

Cookies

King High Line utilizes cookies on kinghighline.com. We collect cookies for two reasons:

1. To provide additional sharing capabilities to the user, by matching them with their supporter listing.
2. For future use if we decide to proceed with further phases of the website, which would include the ability for supporters to login to their support page and make changes.

By using this site you agree to the placement of cookies on your computer in accordance with the terms of this policy. If you do not wish to accept cookies from this site please either disable cookies or refrain from using this site.

Log File

Our web servers use log files to analyze trends, administer our site, track users' movements on an aggregate basis, and gather broad demographic information for aggregate use. The log files include things such as your IP address, User Agent, the type of operating system and browser you use, Internet service providers (ISPs), what pages you visit on our site and what links you click on, number of clicks, what other sites you have visited recently, and date/time stamp. We currently use Google Analytics as our primary statistics systems.

Notice of Collection

Individuals will be informed of the purpose of this information collection before or at the time we collect it. If a new purpose(s) for the information arises after it has been collected, explicit permission to use the information for the new purpose(s) will be obtained from the individuals to whom the information belongs, prior to its use. Any modification to the original purpose(s) will be documented in the Information Log.

Third Parties

King High Line and/or First Capital Realty Inc. does not sell user data or information to third parties.

3. CONSENT

King High Line will obtain consent from an individual to collect, use, and/or disclose their personal information. Consent will be obtained either before or at the time of collection and in cases where a new purpose(s) has been identified after collection, consent will be obtained for the new purpose prior to use. We also recognize that the principle of obtaining consent is dependent on the level of sensitivity of the information and the reasonable expectations of the individual. Given this, King High Line will take reasonable efforts to consider these things, in accordance with PIPEDA whenever necessary. We will also never use deception to obtain information.

Withdrawing Consent

Any time an individual wishes to withdraw consent they can contact King High Line's Privacy Officers, and the procedures and consequences of withdrawal will be explained. After such discussion and the identity of the individual and/or group has been verified, King High Line's Privacy Officers will be more than happy to take the necessary and requested actions required to handle withdrawal of consent.

4. LIMITING COLLECTION

King High Line will only collect information for the purposes stated before or at the time of collection of that information from an individual. We will specify the amount and type of information that is being collected and limit collection to those specifications.

5. LIMITING USE, DISCLOSURE, AND RETENTION

King High Line will only use and disclose personal information for the purposes stated before or at the time of collection of that information. We will specify the amount and type of information that is being collected and limit use and disclosure to those specifications.

Retention

King High Line will retain information collected, used, and disclosed for a client project for a minimum period of six months and maximum period of one year from the latest date of either project completion, unless otherwise agreed upon by King High Line, the client, and/or the individual. Personal information collected through our online contact form becomes part of a contact list and is kept until the individual unsubscribes themselves. When personal information has been used to make a decision about a specific individual, that information will be available to the individual for a minimum of six months and a maximum of one year from the date of the decision. Once collected information has expired, it will be destroyed, erased, or made anonymous.

Legal Disclaimer

Though we make every effort to preserve user privacy, we may need to disclose personal information when required by law when we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order, or legal process served on www.kinghighline.com. King High Line does not assume nor is liable for content shared across social media, or other digital platforms. Therefore, King High Line will not be held responsible in any form of misconduct, slander, misrepresentation, or illegal actions taken once information has been submitted to our database by a supporter.

6. ACCURACY

King High Line will make sure information is as accurate, complete, and up-to-date as is necessary for the purpose(s) that it was collected, used, and/or disclosed. We do not routinely update personal information that is submitted through our online contact form. In the event an individual would like to add, edit, or delete their information, King High Line Privacy Officers would be happy to assist after verifying the individual's identity.

7. SAFEGUARDS

King High Line protects the personal information it collects, uses, and discloses. Physical methods of protection include office alarms and locks on appropriate cabinets. Organizational methods of protection include internal policies and procedures for information use, collection and disclosure. Technical methods of protection include data encryption, firewalls and password access controls. We make our employees aware of these safeguards and take care when disposing of personal information. King High Line uses a computer generated encryption process on all user generated passwords.

8. OPENNESS

King High Line's primary method of communication in its line of business is by digital means. Therefore its policies and procedures are primarily made available digitally, namely online via the Internet. In the event that digital access requires unreasonable effort on behalf of the individual, King High Line would be happy to send a package on our policies and procedures to requesting individuals, provided the cost of doing so is not prohibitively expensive. Questions, comments, and requests regarding our privacy policies and procedures can be forwarded to our Privacy Officers.

9. INDIVIDUAL ACCESS

King High Line will give an individual access to their personal information upon request, provided none of the exceptions noted in Paragraph 4.9 of Schedule 1 of PIPEDA apply. We must receive a request for access to personal information in writing, as per Paragraph 8(1) of PIPEDA and we will assist anyone in doing so, if required, as per Paragraph 8(2) of PIPEDA. If an individual would like their information added to, edited, or deleted after gaining access, King High Line Privacy Officers will be happy to comply, if possible. Certain circumstances may require us to refuse to provide a visitor with a copy of their information, but we will provide reasons for our refusal. For example, if you request access to your information and it contains information belonging to another individual, we will not grant permission unless both parties agree for its release.

Complaints Regarding Access

Requests for access to information are recorded in our Information Log. If an individual feels a request for information has not been handled satisfactorily, the individual should notify King High Line Privacy Officers in writing by email or regular mail. Dissatisfaction will also be noted in the Information Log and the Privacy Officers will take reasonable efforts to remedy the complaint, if found justified.

10. CHALLENGING COMPLIANCE

If an individual has a challenge regarding King High Line's compliance with PIPEDA and Schedule 1 of PIPEDA, they must contact King High Line Privacy Officers. The complaint must contain the date, individuals involved, explicit statement of the events that occurred, and contact information for the individual submitting the complaint. The Privacy Officers will investigate the complaint to the best of their abilities and with reasonable effort. The individual filing the complaint will be notified of the actions taken to remedy the complaint. The complaint will also be noted in the Information Log. In the event an individual is dissatisfied with the remedy for the complaint they may contact the Privacy Commissioner of Canada.

11. LINKS

The King High Line website may contain links to other sites. Please be aware that King High Line is not responsible for the privacy practices of these other sites. We recommend site visitors make themselves aware of the policies of these other sites. Our privacy statement only applies to www.kinghighline.com.

12. NOTIFICATION OF CHANGES TO OUR POLICIES

King High Line will notify individuals of changes by updating the Privacy Policy, placing an announcement on our website and any other method deemed appropriate. As noted in section 2. Identifying Purposes, if the intended purpose for information collection changes, the individual to which the information belongs will be notified via email or other method of communication indicated at the time the information was originally collected prior to its use for the new purpose.

13. CHILDREN'S PRIVACY

The King High Line site does not knowingly collect children's information nor does it target children. In the event we discover we have collected, used, or disclosed children's information through the site we will take immediate action to discontinue such activity. Reasonable effort will be taken to notify the parent/guardian of the child/children involved of the circumstances and any action taken to investigate the matter. King High Line will not be held accountable for any misconduct, misrepresentation, and/or illegal action committed by any employee outside of King High Line and Circus Strategic Communications Inc.

14. EXPRESS CONSENT

King High Line will at times collect the following information from individuals who participate in our events with partners and suppliers:

- First Name
- Last Name
- Postal Code

- Email Address
- Type of Support (Personal, Business, or Group)
- Who recommended their support
- Password (encrypted irreversibly)
- Opt-in for future contact
- Opinions about King High Line

15. IMPLIED CONSENT

Due to the nature of our business at King High Line, we cannot process some web transactions, including sending of email, unless permission is provided explicitly by the participant. An opt-out option is provided once the transaction has been completed and the participant has confirmed that they are the rightful owner of the information.

16. RESOURCES

Several resources were used in the creation of this privacy policy. Organization for Economic Co-operation and Development: Privacy Policy Generator, Privacy Commissioner of Canada: Personal Information Protection and Electronic Documents Act (PIPEDA), and Your Responsibilities: A Guide for Businesses and Organizations.