



Introduction

Circus Strategic Communications 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.circuscommunications.ca and all event web sites produced.

1. Accountability

Circus Strategic Communications 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, Circus Strategic Communications has designated Cheryl Cardon, President. She can be contacted as follows:

Circus Strategic Communications
Cheryl Cardon
247 Armstrong Ave, Unit 10
Georgetown, ON
Canada
L7G 4X6
(905) 873-8426
cheryl@circuscommunications.ca

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 either of the two designated officers.

2. Identifying Purposes

Contact Forms

Circus Strategic Communications collects personal information through its web site contact form. Information collected from this form is used for such things as marketing, business development, 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 as well as our suppliers or partners. Individuals may choose to unsubscribe from this mailing list from an unsubscribe email link in the actual mailing or by calling or emailing Circus Strategic Communications Privacy Officers. Information that is collected is kept in electronic form on our servers and/or in hard copy form under secure access. This information is only disclosed to the owners and employees of Circus Strategic Communications.

Cookies

Circus Strategic Communications does not utilize cookies on www.circuscommunications.ca

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 Internet Protocol addresses (IP addresses), browser types and versions, Internet service providers (ISPs), referring/exit pages, platform types, date/time stamp, and number of clicks. 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

Circus Strategic Communications does not sell its information with third parties.

3. Consent

Circus Strategic Communications 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, Circus Strategic Communications will take reasonable efforts to consider these things, in accordance with PIPEDA whenever necessary. We will also never use deception to obtain information. Honesty is Circus Strategic Communications strongest founding principle.

Withdrawing Consent

Any time an individual wishes to withdraw consent they can contact Circus Strategic Communications' 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, Circus Strategic Communications Privacy Officers will be more than happy to take the necessary and requested actions required to handle withdrawal of consent.

4. Limiting Collection

Circus Strategic Communications 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

Circus Strategic Communications 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

Circus Strategic Communications 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, training completion, or final invoicing, unless otherwise agreed upon by Circus Strategic Communications, 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. In the event a request for personal information has been refused, the personal information relating to that request shall be retained for a minimum of six months and a maximum of one year from the date refusal was delivered, not received. 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.circuscommunications.ca and any web site produced for our clients. Circus Strategic Communications does not assume nor is liable for photos and or video those are shared across social media platforms. Therefore, Circus Strategic Communications will not be held responsible in any form of misconduct, slander, misrepresentation, or illegal actions taken once a photo or video link has been sent to the participating individual.

Business Transitions

In the event Circus Strategic Communications goes through a business transition, such as a





merger, being acquired by another entity or selling a portion of its assets, users' information will, in most instances, be part of the assets transferred.

6. Accuracy

Circus Strategic Communications 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, Circus Strategic Communications Privacy Officers would be happy to assist after verifying the individual's identity.

7. Safeguards

Circus Strategic Communications 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 firewall, firewalls, and password access controls. We make our employees aware of these safeguards and take care when disposing of personal information. Circus Strategic Communications uses a computer generated encryption process on all photo and video links.

8. Openness

Circus Strategic Communications 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, Circus Strategic Communications 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

Circus Strategic Communications 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, Circus Strategic Communications 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 Circus Strategic Communications 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 Circus Strategic Communications compliance with PIPEDA and Schedule 1 of PIPEDA, they must contact Circus Strategic Communications 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 Circus Strategic Communications web site may contain links to other sites. Please be aware that Circus Strategic Communications 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.circuscommunications.ca and web sites that are developed and maintained for our clients.

12. Notification of Changes To Our Policies

Circus Strategic Communications 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 Circus Strategic Communications 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. In the event that a photo or a video link has been sent incorrectly, the Circus Strategic Communications technical staff will correct this matter within a reasonable time. Circus Strategic Communications will not be held accountable for any misconduct, misrepresentation, and or illegal action committed by any employee outside of Circus Strategic Communications and Circus Strategic Communications Inc.

14. Express Consent

Circus Strategic Communications will at times collect the following information from individuals who participate in our events with partners and suppliers:

Contact Information includes:

- Name
- Address
- Postal Code
- Phone Number
- Email Address

Customer Demographics includes:

- Date of Birth/Age
- Gender
- Household Income

Purchase Information includes:

- Purchase history
- Product/Service preferences

Opinions/Interests includes:

- Customer satisfaction information
- Opinions about products and services
- Interests and hobbies

15. Implied Consent

Due to the nature of our business at Circus Strategic Communications, we cannot process some web transactions unless certain information is provided by the participant. An opt-out option is provided once the transaction has been completed and the participant has received a link to their personal photo or video.

16. Public and Private Galleries





Circus Strategic Communications produces both private and public internet content. Consent must be given by the participant in order to participate in either form of event.

17. 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

