



POLICY & PROCEDURE BULLETIN

Subject:	Privacy Policy (External)	Policy Number:	5-9 - 002
Approved by:	Vice President, Human Resources & Strategy	Approved/ Effective Date:	August 30, 2023
Revision Date(s):		Replaces Policy:	
Division Responsible:	Human Resources	Retired Date:	

Purpose:

Arctic Co-operatives Limited and our affiliates, subsidiaries and member-owners co-operatives (“Company” or “we”) respect your privacy and are committed to protecting by complying with this policy.

This policy describes:

- How we collect, use, disclose, and protect the personal information of our customers and website users ("**you**").
- Describes the types of information we may collect from you or that you may provide when you visit the websites arcticco-op.com, innsnorth.com and coopshop.ca (our "**Websites**").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

We will only use your personal information in accordance with this policy unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

Privacy laws in Canada generally define "personal information" as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person. Personal information does not include business contact information, including your name, title, or business contact information.

This policy applies to information we collect, use, or disclose about you:

- On the Websites.
- In email, text, and other electronic messages between you and the Websites.
- When you interact with our advertising and applications on third-party websites and services if those applications or advertising include links to this policy.
- From offline activities and communications.

The Websites may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept

any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, your choice is not to use our Websites. By accessing or using the Websites, you indicate that you understand, accept, and consent to the practices described in this policy. This policy may change from time to time. Your continued use of this Website after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates. We will notify you in advance of any material changes to this policy and obtain your consent to any new ways that we collect, use, and disclose your personal information.

INFORMATION WE COLLECT ABOUT YOU

We collect and use several types of information from and about you, including:

- **Personal information**, that we can reasonably use to directly or indirectly identify you, such as your name, mailing address, e-mail address, telephone number, Internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier, billing and account information; product and service related information concerning the products and services that we provide to, or receive from you; and business relationship information, including information related to your agreements, preferences, advisors and decision-makers, feed-back and information requested by or provided to you; and any other identifier we may use to contact you ("**personal information**").

We provide an opportunity for any user to unsubscribe from our emails or opt-out of contact for marketing purposes on an ongoing basis by using the unsubscribe mechanism at the bottom of our e-mail or e-mailing to siteadmin@arctic.coop.

- **Non-personal information**, that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal information. For example, we may aggregate personal information to calculate the percentage of users accessing a specific Website feature.
- **Technical information**, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Websites, and usage details.
- **Non-personal details about your Website interactions**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Websites (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from the page.

HOW WE COLLECT INFORMATION ABOUT YOU

We use different methods to collect your information, including through:

- **Direct interactions with you when you provide it to us**, for example, by filling in forms or corresponding with us by phone, email, or otherwise.

- **User contributions.** You may also provide information for us to publish or display on public Website areas or transmit to other Website users or third parties.
- **Automated technologies or interactions,** as you navigate through our Websites. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies.
- **Third parties or publicly available sources,** for example, our subsidiaries, affiliates, and member-owner co-operatives.

Information You Provide to Us

The information we collect directly from you on or through our Websites may include:

- Information that you provide by filling in forms on our Websites. This includes information provided at the time of registering to use our Websites, subscribing to our service and requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Websites.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website.

You may also provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although [we limit access to certain pages/you may set certain privacy settings for such information by logging into your account profile], please be aware that no security measures are perfect. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that unauthorized persons will not view your User Contributions.

Information We Collect Through Cookies and Other Automatic Data Collection Technologies

As you navigate through and interact with our Websites, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns. Please see our [Cookies Policy](#) for further details.

The information we collect automatically is statistical data and does not include personal information and we may maintain it or associate it with personal information we collect in other ways, that you provide to us, or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.

- Recognize you when you return to our Website.

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Websites and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it.
- To provide you with notices about your account, where applicable, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.
- To notify you about changes to our Websites or any products or services we offer or provide through it.
- To improve our Websites, products or services, marketing, or customer relationships and experiences.
- To allow you to participate in interactive features, social media, or similar features on our Websites.
- To measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you, as permitted by law. If you do not want us to use your information in this way, please use the unsubscribe mechanism at the bottom of our e-mails or e-mail us at siteadmin@arctic.coop.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

DISCLOSURE OF YOUR INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries, affiliates and member-owner co-operatives.
- In accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or

all of Arctic Co-operatives Limited's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Arctic Co-operatives Limited about our customers and users is among the assets transferred.

- To third parties to market their products or services to you if you have consented to these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
- To enforce or apply our [Terms of Use](#) or [Terms of Sale](#) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Arctic Co-operatives Limited, any subsidiary, affiliate or member-owner co-operative, any of our/their customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

TRANSFERRING YOUR PERSONAL INFORMATION

We may transfer personal information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

By submitting your personal information or engaging with the Websites, you consent to this transfer, storage, or processing.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of our Websites may not be accessible or may not function properly.
- **Promotional Offers from the Company.** If you have opted in to receive certain emails from us but no longer wish to have your email address used by the Company to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to unsubscribe@arctic.coop. If we have sent you a promotional email, you may unsubscribe by clicking the unsubscribe link we have included in the email. This opt-out does not apply to information provided to the Company as part of a product purchase, warranty registration, product service experience, or other transactions.

DATA SECURITY

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We store all information you provide to us behind firewalls on our secure servers. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Websites. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

DATA RETENTION

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

CHILDREN UNDER THE AGE OF 13

Our Websites are not intended for children under 13 years of age. No one under age 13 may provide any personal information to the Websites. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our Websites or on or through any of its features/register on the Websites, make any purchases

through the Websites, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at siteadmin@arctic.coop.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you.

You can review and change your personal information by logging into the Website and visiting your account profile page.

If you want to review, verify, correct, or withdraw consent to the use of your personal information you may also send us an email at siteadmin@arctic.coop to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

If you are concerned about our response or would like to correct the information provided, you may contact our Privacy Officer at privacy@arctic.coop.

WITHDRAWING YOUR CONSENT

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at siteadmin@arctic.coop. Please note that if you withdraw your consent we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.

CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Websites' home pages.

We include the date the privacy policy was last revised at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

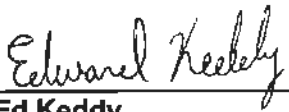
CONTACT INFORMATION AND CHALLENGING COMPLIANCE

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at:

Privacy Officer, privacy@arctic.coop

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact our Privacy Officer using the contact information listed above.

Approved by:



Ed Keddy
Vice President, Human Resources & Strategy



Rod Wilson
Chief Executive Officer

Aug 30th / 23
Date

August 30, 2023
Date