GEORGIAN BAY SPIRIT CO. - PRIVACY STATEMENT

Last updated: September 7, 2017

Thank you for visiting <u>georgianbayspiritco.com</u>, the official website ("**Website**") of Georgian Bay Spirit Co. ("**Georgian Bay**").

This Privacy Statement explains how personal information about you is collected, used, disclosed and otherwise processed by Georgian Bay when you use and interact with our Website. This Privacy Statement also applies to our offline collection of personal information, e.g. when you enter a contest at a public event, visit us at trade shows or community events, call us, etc.

HEY! ARE YOU OF LEGAL DRINKING AGE?

Our Website is intended only for those of legal drinking age in the province/territory where they live/reside. In Ontario, this means 19+. Do not use our Website and do not provide us with your personal information if you are not of legal drinking age. If we believe that you are under the legal drinking age we will make every reasonable effort to remove your personal information from our records.

How do we collect personal information and what personal information do we collect?

Generally, we collect personal information from you when you provide it directly to us, e.g. when you contact us, enter a contest, join our Insider's Club or make inquiries to our webmaster.

Some of the personal information we may collect and use includes:

- first and last name
- age
- email address
- address and telephone number
- location
- photos, e.g. when you upload a photo as part of a contest or promotion
- information you include in any questions, complaints or inquiries to us
- information you provide over the phone or in person, and
- other information that may be required to provide you with our Website, products and services

2. How we automatically collect technical information

Like many websites, we automatically collect technical information when individuals use the Website. We use third-party analytics services, such as Google Analytics and others, to help us to better understand the functionality of our Website on your computer, smartphone or other device. Analytics may record information such as how often you use our Website, which features you use or don't use, aggregated usage, performance data, and where the Website was accessed from. These tools may collect your computer's operating system, IP address, browser type, and usage and activity.

3. How do you use my personal information?

Georgian Bay may use and share your personal information for the following purposes:

- administering and processing our Website, products and services
- generating statistics, aggregating data, measuring the Website activities, personalizing your experience on our Website, and detecting and preventing security threats
- helping us develop and market our brand, products, services, promotions and advertising
- registering new members to our Insider's Club

- communicating with you, including our members, about our products, services, upcoming contests and events, promotions and special offers, and other news about Georgian Bay and our select partners
- administering contests
- communicating with you about technical notices, updates, security alerts and support
- responding to your requests, complaints, comments and questions, and
- other purposes that we identify to you from time-to-time

We may combine technical information that does not directly identify an individual with information collected from other sources and disclose the aggregate information to third parties for the above stated purposes.

4. How is my information secured and where is the information located?

The safeguarding of your personal information is important to us. Georgian Bay employs reasonable administrative, technical and physical safeguards to protect your information from loss, theft and unauthorized access, use, disclosure, alteration, modification and destruction.

If we use third party service providers to assist in processing your personal information, Georgian Bay requires such service providers to use similar safeguards to those used by Georgian Bay, including restricting access to your personal information and to keep it strictly confidential. Service providers are only permitted to use your personal information for the sole purpose of carrying out services on behalf of Georgian Bay.

Georgian Bay retains your personal information only as long as necessary or relevant for the purposes we identified or as required by law.

Your personal information is stored in Canada; however, one or more of our partners or service providers may be located in another country outside of Canada. As such, your personal information may be transferred to a country outside Canada and be subject to the authorities and laws of that jurisdiction.

5. What about third party links?

Our Website may be linked from another website, or have links to other websites or social media platforms. We include these third party links for your interest and enjoyment, but please note that this Privacy Statement does not extend beyond our Website, including any third party links. We encourage you to review the privacy policies of all websites that you may visit so that you can understand the privacy practices of those websites.

We are not responsible for the privacy policies, content or data handling practices on other websites.

6. How and why do you share my personal information?

Georgian Bay may use and share your personal information with affiliated and non-affiliated third parties (partners, contractors, service providers, agencies and other organizations) to help us administer this Website, as well as our business, products and services. For example, we may share information with third parties to assist us in data storage, web hosting and providing our promotional and marketing initiatives.

We may share personal information with government, regulatory and law enforcement agencies as requested by these agencies, if the disclosure is required or permitted by law. We may share information to take action regarding illegal activities or violations of our Terms of Use, or as otherwise required by law.

While unlikely, we may transfer or assign your personal information to third parties as a result of or in connection with a sale, merger, consolidation, change in control, transfer of assets, reorganization, or liquidation.

7. What choices do I have?

You have choices when it comes to your personal information.

Insider's Club. If at any time you decide you no longer want to receive promotional communications and marketing emails from Georgian Bay or our selected partners, such as special offers, upcoming events or other marketing information, you can opt-out by clicking the "unsubscribe" function at the bottom of any email or by contacting us at: info@georgianbayspiritco.com. Please allow 5-9 business days to process your request.

Access Requests. At your request, we will let you know what personal information Georgian Bay has about you, what it is being used for, and with whom it has been shared. If you notice any inaccuracies or wish to update any part of your personal information, we will look into that as well.

To make a request, contact us at: info@georgianbayspiritco.com, Attention: Access Request.

Please note that while we understand you have a right to access your information, in limited circumstances exceptions to an access request may apply, including information that is referenced to another individual's personal information that cannot be severed, information subject to solicitor-client privilege, or other legal restrictions that may prevent us from fulfilling your request.

Questions. If you have questions or complaints about this Privacy Statement or our privacy practices, you may contact us directly by:

Mail:

Attention: Privacy Officer Georgian Bay Spirit Co.

50 Cumberland Street, 4th Floor

Toronto ON M4W 1J5

info@georgianbayspiritco.com

Phone: 416-535-9441

Email: 416-535-9441