

## Privacy Statement

[\(http://www.datacurrent.ca/contact-us-2/\)](http://www.datacurrent.ca/contact-us-2/)

**Last Updated April 02, 2020**

At Smart City Water (SCW), we pride ourselves on our commitment to protecting your privacy. Our Data Stewardship Principles reflect our company's values and how we strive to maintain your privacy. This Privacy Statement describes in greater detail the privacy practices for collecting and maintaining certain information collected about you.

1. **WHEN THIS PRIVACY STATEMENT APPLIES.** If a Service you're using links to this Privacy Statement, this Statement applies to you. This Privacy Statement ("Statement") applies to our sites, products, and services (collectively, "Services") that link to this Statement. Smart City Water Inc. is the controller of all Personal Information subject to this Statement for our Services.

2. **WHAT WE DO WITH YOUR INFORMATION.** We want to be clear about what information we collect and how we use it to deliver our Services to you, operate our business, and help make our Services useful, more intelligent, and work better for you. We do not sell or share your Personal Information with third parties for their own commercial uses without your consent.

a) **Types of Information We Collect.** In connection with accessing our Services, we may collect information from you which can be used to identify you ("Personal Information"), such as your name, shipping/billing address, email address, phone, username and password. We collect information when you register or open an account, sign in, use a Service, call us for support, or give us feedback. We may also get information from other companies or third parties, such as when you sync a third party account or service with your SCW Service, or when we may use service providers to supplement the Personal Information you give us (e.g., validate your mailing address) to help us maintain the accuracy of your data and provide you with better service. Finally, we also collect content or other information that you may provide or create when you interact with our Services.

We may also automatically collect certain usage information when you access our Services ("Usage Data"), such as Internet Protocol ("IP") addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our Services, and other usage information collected from cookies and other tracking technologies. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate to our Services. We also collect IP addresses from users when they log into the Services as part of our log-in and security features. We may also, when you enable location-based Services, collect Global Positioning System (GPS) location data and/or motion data.

Our Services may change over time and we may introduce new features that may collect new or different types of information.

b) **How We Use Your Information.** We may use your information, including your Personal Information, for the following purposes:

**Account Registration.** We may use your name, address, phone number, and email address to register your account for certain Services we provide and to communicate important information to you. We may obtain additional Personal Information about you, such as address change information, from commercially available sources, to keep our records current. If you set up an administrator account that may be accessed by people other than you, please note that they may see and have the ability to change or delete your Personal Information.

To Provide Our Services and Operate Our Business. We may use your information to operate our business, including providing Services you requested, provide you with support related to our Services, and to help us protect our Services, including to combat fraud and protect your information.

**Customer Service and Technical Support.** We may use your name, address, phone number, email address, how you interact with our Services, and information about your computer configuration to resolve questions you may have about our Services and to follow up with you about your experience.

**Communicate with You and Tell You About Other Services.** We may use your information to communicate with you about our Services and to give you offers for third party products and services that we think may be of use to you. Please see below under "What You Can Do to Manage Your Privacy" for the choices you have regarding these communications.

To Improve Services and Develop New Services. We will use your information to personalize or customize your experience and the Service, develop new features or services, and to improve the overall quality of SCW Services.

**Feedback.** We may use any information you volunteer in surveys you answer for us and combine them with answers from other customers in order to better understand our Services and how we may improve them. Answering any survey is optional.

**Research, Including Publishing or Sharing Combined Information from Many Users,** But Only in a Way that Would Not Allow You or Any Other Person to be Identified. Only in a way that would not allow you or any other person to be identified, we may prepare and share information about our customers with third parties, such as advertisers or partners, for research, academic, marketing and/or promotional purposes. For example, we may share demographic data that describes the percentage of our customers who use mobile services or who use a particular operating system. We or our third party partners may publicly report the aggregated findings of the research or analysis, but only in a way that would not allow you or any other person to be identified.

c) **How We Share Your Personal Information.** From time to time, we may need to share your Personal Information with others.

**Third Party Service Providers.** We may share your information, including Personal Information and Usage Data, with third party service providers who perform various functions to enable us to provide our Services and help us operate our business, such as website design, sending email communications, fraud detection and prevention, customer care, or performing analytics. Our contracts with these third parties require them to maintain the confidentiality of the Personal Information we provide to them, only act on our behalf and under our instructions, and not use Personal Information for purposes other than the product or service they're providing to us or on our behalf.

**Response to Subpoenas and Other Legal Requests.** We may share your information with courts, law enforcement agencies, or other government bodies when we have a good faith belief we're required or permitted to do so by law, including to meet national security or law enforcement requirements, to protect our company, or to respond to a court order, subpoena, search warrant, or other law enforcement request.

**With your Consent.** Other than as set out above, we will provide you with notice and the opportunity to choose when your Personal Information may be shared with other third parties.

3. **WHAT YOU CAN DO TO MANAGE YOUR PRIVACY.** You can view and edit information that identifies you online through your SCW Service. How you can access and control information that identifies you will depend on which Services you use. You have a choice about the use of information that identifies you, marketing communications you receive from us, and our use of cookies and other tracking technologies.

a) **Updating Your Personal Information.** In connection with your right to manage your Personal Information you provide to us, you may access, update, change, correct or request deletion of your information either through the Service or through our customer support. You can reach our customer support by using the contact information provided in the "How to Contact Us" section of this statement.

b) **Managing Marketing Communications From Us.** We will honour your choices when it comes to receiving marketing communications from us.

You have the following choices if you have been receiving marketing communications from us that you no longer wish to receive:

Click the "unsubscribe" or opt-out link in the email or newsletter you received. Adjust your preferences in the settings of your account(s).

You can also change your marketing preferences by sending your request to the mail and/or email addresses below. Please include the contact information to which you no longer wish to receive marketing communications.

#### MAIL

SmartCityWater  
Attention: Opt Out  
330 Rodinea Rd,  
Maple, ONTARIO  
L6A 4P5, Canada

#### EMAIL

Subject: Opt Out  
solutions@smartcitywater.ca

Remember that even if you choose not to receive marketing communications from us, we will continue to send you mandatory service or transactional communications.

c) **Cookies and Other Tracking Technologies.** The following is a high level summary of our practices and your controls for cookies and other tracking technologies. For more information, please see our Cookies Policy.

In accordance with applicable law, SCW and our service providers may use commonly-used tools to recognize your visit and track your interactions with our Services such as cookies, web beacons, pixels, local shared objects, and similar technologies (collectively, "Cookies"). Sometimes this tracking is necessary in order for us to provide you the Service you requested. Other times, we combine Usage Data collected from Cookies with that of other customers to improve your and other customers' experience. You have control over some of the Usage Data we collect from Cookies and how we use it. Information on changing your browser settings to opt out of Cookies can be found in your browser settings.

#### 4. DATA RETENTION AND YOUR ACCESS RIGHTS.

a) **Data Retention.** In accordance with and as permitted by applicable law and regulations, we will retain your information as long as necessary to serve you, to maintain your account for as long as your account is active, or as otherwise needed to operate our business. When you close your account, we may continue to communicate with you about our Services, give you important business updates that may affect you, and

let you know about products and services that may interest you, unless you have opted out of receiving marketing communications.

We may also continue to use some of your information for business purposes and to improve our offerings or in some cases to develop new ones. We will retain and use your information as required by applicable regulations and SCW's records and information management policies to comply with our legal and reporting obligations, resolve disputes, enforce our agreements, complete any outstanding transactions and for the detection and prevention of fraud.

b) **Your Access Rights.** As required by applicable law, you may contact us to confirm whether we maintain, or process on behalf of a third party, any of your Personal Information and to review it in order to verify its accuracy and the lawfulness of our processing of such Personal Information. Where you have determined that the Personal Information we collected about you is inaccurate or processed in violation of applicable law, you may also request that your Personal Information be corrected, amended, or deleted. Requests for access to your Personal Information and to have it corrected, amended, or deleted should be sent to solutions@smartcitywater.ca or to the mailing address provided under "How to Contact Us."

5. **SECURITY OF YOUR INFORMATION.** Keeping your Information safe is important to us. We provide reasonable and appropriate security measures in connection with securing Personal Information we collect.

For example, we:

- Constantly work to update our security practices to implement accepted best methods to protect your Personal Information, and review our security procedures carefully.
- Comply with applicable laws and security standards. Securely transmit your sensitive Personal Information. Train our staff and require them to safeguard your data.

6. **HOW TO CONTACT US.** All inquiries or complaints regarding privacy, including any questions or comments about this Privacy Statement, should be directed to the privacy officer by mail, fax or e-mail at the addresses below. Inquiries will be responded to in accordance with the legislated timeframes. We want your feedback and comments.

a) **Via eMail.** If you have questions or complaints regarding our Privacy Statement or practices, please contact us by email at solutions@smartcitywater.ca.

b) **Via Direct Mail.**

Smart City Water  
Attention: Privacy Officer  
330 Rodinea Rd, Maple, ONTARIO L6A 4P5, Canada

7. **CHANGES TO OUR PRIVACY STATEMENTS.** From time to time we may change or update our Privacy Statements. We reserve the right to make changes or updates at any time. More information about how we will notify you is below.

If we make material changes to the way we process your Personal Information, we will provide you notice via our Service or by other communication channels, such as by email or community post.

Please review any changes carefully. If you object to any of the changes and no longer wish to use our Services, you may close your account(s). All changes are effective immediately upon posting and your use of our Service after a notice of material change or posting of an updated Privacy Statement shall constitute your consent to all changes.

8. **COLLECTION AND USE OF CHILDREN'S PERSONAL INFORMATION.** We do not knowingly collect information from minors.

Smart City Water Services are intended for and directed to adults. Our Services are not directed to minors and we do not knowingly collect Personal Information from minors.