

## Regional Tourism Organization 12 Survey Research Privacy Policy

This privacy policy applies to use of online survey research performed by Regional Tourism Organization 12 or its agents, 3-1 Taylor Road, Bracebridge, ON P1L 1S6 (“RTO12” or “we”).

In this Policy, the definition of ‘personal data’ is information relating to an identifiable individual. The terms personal data and personal information are used interchangeably.

By participating in this research and/or using our website, you agree to the processing of your personal data as described by the Policy. We ask you to read this privacy policy carefully.

### Lawful Collection, Source and Use of Data

This Policy explains how we collect, store and use the personal data you provide when taking part in an online survey for us or other market research methodologies.

When we conduct surveys, our invitations, platforms and questionnaires clearly identify us and explain the purpose(s) of our contact and if applicable, the purpose for our collecting your personal data. You may decline to answer any questions or withdraw from participation in a survey at any time. When we contact you, generally in person, by telephone or by email, we do so for one of the following purposes:

Case	Purpose	Source	Data collected/processed	Legal Basis
Market Research Surveys	To understand your views about certain products and services or to understand your behaviour in different situations. To validate answers you gave in a recent survey we conducted. To administer participation e.g. sweepstakes, incentives, etc. To re-contact participants e.g. for ongoing and follow -up surveys	We collect this data directly from you.	Unique identifier, contact details, email address, voice, image, personal opinions, perceptions, behaviors, and demographic information, such as your age and household composition.	Voluntary participation in a survey whereby we ask for your consent to use your personal data
Fraud Protection	Protection of our business interests against fraudulent behaviour or behaviour not in line with our Terms and Conditions	We collect this data directly from you.	IP address, browser specifications, device specifications, postal addresses, email addresses	Legitimate interests – we have a legitimate interest in protecting our business against fraud or other prohibited behaviour.
Providing you with information	Provide you with information regarding RTO12 that you request from us, or that we have determined may be of interest to you.	Name, email address, IP address, phone number, postal address, job title	We obtain this data from you directly, for example when you make an enquiry with us or request to be added to our email list.	We will seek your consent or we have determined that we have a legitimate interest in using your details to provide you with relevant information. Further information will be provided in the privacy statement provided prior to you submitting your data. You can withdraw your consent or opt out of communications from RTO12 at any time.
Survey Participation Uniqueness	Prevention of multiple entries in surveys by the same individuals in line with our Terms and Conditions	We collect this data directly from you.	IP address, browser specifications, device specifications	Legitimate interests – we have a legitimate interest in preventing multiple entries by the same individual, in contravention of our Terms and Conditions.
Managing online or telephone survey Opt-Outs	When an individual has requested not to be contacted again, we hold their details to enable this.	We collect this data directly from you.	Contact details, name, email address, telephone number	Legitimate interests – we have a legitimate interest to retain the information in order to fulfil the individual's request.

We will never misrepresent ourselves or what we are doing. If you ever suspect a communication you receive is not genuine please contact us immediately. See “How to contact us”.

We have contacted you to take part in a survey as we received your contact details from you directly, for example when you make an inquiry with us or you requested to be added to our email list.

### **Information We Share or Transfer**

Your survey responses are confidentially handled. For market research surveys we combine all participants' responses to report on an aggregated basis (without identifying the individual respondents or providing personal information) to the client that commissioned the study.

Your survey responses and personal information may be collected, stored, transferred or processed by 3rd party service providers for research-related purposes, such as data processing, both within and outside the United States and/or Canada. They are all contractually bound to keep any information they collect and disclose to us or, we collect and disclose to them, confidential and must protect it with security standards and practices that are equivalent to our own. We do not sell your personal data.

### **Security of personal information**

We have appropriate technological and organizational measures in place to protect your personal data and take all reasonable steps to ensure your personal data is processed securely. All information you provide us is stored in secure servers and environments. Unfortunately, no data transmission can be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, we cannot ensure or warrant the security of any information you transmit to us or from our online products or services, and you do so at your own risk. Once we receive your transmission, we will take reasonable steps to ensure our systems are secure. All our third-party contractors, site service providers and employees are contractually obliged to follow our policies and procedures regarding confidentiality, security and privacy.

### **Accuracy of personal information**

We make reasonable efforts to keep personal information in our possession or control which is used on an ongoing basis, accurate and complete, current and relevant, based on the most recent information made available to us by you and/or by our client

We rely on you to help us keep your personal information accurate, complete and current by answering our questions honestly and you are responsible for ensuring that the data controller (which may be us or - more often - our client) is notified of any changes to your personal data.

### **Children's Data Collection**

We do not knowingly invite children under the age of 13 to participate in research studies without taking measures to obtain parental consent.

### **Cookies**

Cookies are small text files stored on your computer by a website that assigns a numerical user ID and stores certain information about your online browsing. They are used by web developers to help users navigate their websites efficiently and perform certain functions. The website sends information to the browser which then creates a text file. Every time the user goes back to the same website, the browser retrieves and sends this file to the website's server.

As is true of most online surveys, we gather certain information automatically and store it in survey data files. This information may include things like Internet Protocol addresses (IP address), browser type, Internet service provider (ISP); referring/exit pages, operating system and date/time stamp.

We use this automatically collected information to analyze trends such as browser usage and to administer the site, e.g. to optimize the survey experience depending on your browser type. We may also use your IP address to check whether there have been multiple participations in the survey from this IP address.

### **Access to personal information**

To request access to personal information that we hold about you, we require that you submit your request in writing to the e-mail address shown below under “How to contact us”. When you make a request you should indicate the name of the research survey. If you contact us using an email address or contact details for which we do not hold a record of, you may also need to provide a copy of a valid government issued or official identification (such as drivers license or passport).

You have the following rights in relation to your personal data:

- Right to to withdraw your consent
- Right to access your personal data
- Right to rectify your personal data
- Right to erase your personal data from our systems, unless we have legitimate interest reasons for continuing to process the information
- Right to transfer your personal data (portability right)
- Right to restrict processing of your personal data
- Right to object to the processing of your personal data
- Right to not be discriminated against for exercising any of the rights available to you under applicable data protection laws.

If necessary, we will notify any other parties such as our suppliers or service providers to whom we have transferred your personal data of any changes that we make when you make a request. Note that while we communicate to these other parties, we are not responsible for the actions taken by these other parties to answer your request. You may be able to access your personal data held by these other parties and correct, amend or delete it where it is inaccurate.

### **Data Storage and Retention**

Personal information will be retained only for such period as is appropriate for its intended and lawful use, unless otherwise required to do so by law. Personal information that is no longer required will be disposed of in ways that ensure their confidential nature is not compromised. As part of the Company Business Continuity plan and in certain instances as may be required by law, our electronic systems are backed up and archived. These archives are retained for a defined period of time in a strictly controlled environment. Once expired, the data is deleted and the physical media destroyed to ensure the data is erased completely.

### **How to contact us**

If you are not happy with the way we have processed your personal data, we'd like a chance to put that right. Please contact us and we will have somebody contact you. You can contact us by: Emailing us at [info@explorersedge.ca](mailto:info@explorersedge.ca), calling us at (705) 646.0490 or mailing us at 3-1 Taylor Road, Bracebridge, ON P1L 1S6