

## Chinese Tea Culture Canada Inc. - Privacy Policy

THIS POLICY DESCRIBES HOW PERSONAL INFORMATION ABOUT YOU MAY BE COLLECTED, USED AND DISCLOSED, AND HOW YOU CAN GET ACCESS TO, AND/OR CORRECT, THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

### I. YOUR PRIVACY RIGHTS

Chinese Tea Culture Canada Inc. recognizes the importance of privacy and the sensitivity of personal information. We are committed to protecting any personal information we hold. For these reasons we have created the following Privacy Policy ("Privacy Policy"). This Privacy Policy outlines how we manage your personal information and safeguard your privacy. This policy also applies to Chinese Tea Culture Canada Inc.'s affiliate Canadian organizations, including Abax Communications Group. From January 1, 2004, all businesses engaged in commercial activities must comply with the Personal Information Protection and Electronic Documents Act, and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. The Act gives you rights concerning the privacy of your personal information. Chinese Tea Culture Canada Inc. is responsible for the personal information we collect and hold. To ensure this accountability, we have developed this policy, and trained our employees about our policies and practices.

### II. WHAT IS PERSONAL INFORMATION

Personal Information or "PI" for short is defined as any information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization. For example, your PI includes information that relates to your physical or mental health, race, origin, color, religion, age, marital status, education, medical, criminal or employment history, information relating to financial transactions, identifying number, an unlisted address or unlisted telephone number, fingerprints, and blood type, among others. In addition, some information that is otherwise publicly available is not protected by the Act.

### III. HOW WE COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION.

We collect, use and disclose personal information for many different reasons. Below, we describe the different categories of our uses and disclosure as well as give you some examples of each category.

#### A. Collection, Use, Disclosure, and Retention of Personal Information.

Principles of Personal Information:

1. Chinese Tea Culture Canada Inc. will not collect any personal information about you unless it relates directly to activities our organization performs. Chinese Tea Culture Canada Inc. will obtain your consent before or at the time the information about you is collected, with very few exceptions. Normally, we ask for your consent in writing, but in some circumstances, we may accept your oral consent. Sometimes, your consent may be implied through your conduct with us or we may not ask for your specific consent in a case of urgency or where we believe you would consent if asked and it is impractical to obtain your consent. Any information previously collected about you will not be re-collected. In order for us to continue to use the previously collected information, we need your consent. You may also withdraw your consent in writing, to stop any future uses or disclosure (to the extent we have not taken any action relying on that consent). Your withdrawal will not have an effect on the use or disclosure occurring prior to our receipt of your withdrawal.
2. Chinese Tea Culture Canada Inc. will notify you about the purpose for which information about you is requested at or before the information about you is collected. This notification may be provided orally or in writing. In the event Chinese Tea Culture Canada Inc. wishes to use your information for a new purpose, you will be notified, and have an opportunity to provide or refuse your consent.
3. After obtaining your consent, Chinese Tea Culture Canada Inc. may only use or disclose your PI for the purpose for which the information was collected, or for a use consistent with that purpose. We will use or disclose such information only for the purpose for which it was collected, unless we have your consent, or unless the use or disclosure fits into one of the exceptions listed below. When information is to be used or disclosed for a purpose not previously identified to you, such new purpose will be identified for you prior to use or disclosure, and your consent will be requested.

4. Whenever possible, Chinese Tea Culture Canada Inc. will collect PI directly from you, unless you have authorized otherwise. We collect information only by lawful and fair means and not in an unreasonably intrusive way.

5. Chinese Tea Culture Canada Inc. will take reasonable steps to ensure that your PI is accurate, up-to-date, and as complete as possible. If Chinese Tea Culture Canada Inc. holds information about you and you can establish that it is not accurate, up-to-date and complete, we will take reasonable steps to correct it. If any of your information changes, please inform us so that we can make any necessary changes.

6. We retain personal information for only as long as we need it to effectively provide our services and for a reasonable length of time thereafter in case we need to meet any potential obligations or legal or government requirements. We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it, and when the hardware is discarded, we ensure that the hard drive is physically destroyed.

#### B. Exceptions to Consent.

Under certain circumstances we may use and/or disclose your PI without your consent or knowledge. For example:

1. When disclosure is authorized, or required by law. For example, we will disclose PI when a law, court order or a subpoena requires that we disclose information. We will also make disclosures when the Attorney General of Canada requires it for proceedings involving the Crown in right of Canada or the Canadian Government.

2. For governmental investigation activities. For example, we will provide information to assist the government when it conducts an investigation, audit or inspection of an organization or other person based upon breach of an agreement or a contravention of federal or provincial law, or if the information relates to national security, the defense of Canada or the conduct of international affairs.

3. In emergency situations. We may disclose PI because of an emergency that threatens the life, health or security of an individual. In this case, we will inform you in writing of the disclosure.

4. For legal activities. We may provide your PI to a lawyer who is representing Chinese Tea Culture Canada Inc..

5. For debt collection. We may disclose your PI for the purpose of collecting a debt owed by you to Chinese Tea Culture Canada Inc., if any.

#### C. Security Safeguards.

Chinese Tea Culture Canada Inc. takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure.

Among the steps taken to protect your information are:

- premises security such as supervised or locked cabinet storage;
- restricted file access to personal information;
- deploying technological safeguards like passwords, security software and firewalls to prevent hacking or unauthorized computer access;
- paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies;
- electronic information is transmitted either through a direct line or is anonymized or encrypted;
- internal password and security policies. We use a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These include computer consultants, office security and maintenance, bookkeepers and accountants, credit card companies, website managers and landlord. We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

## IV. YOUR RIGHTS ASSOCIATED WITH YOUR PI

You have the following rights with respect to your PI:

A. The Right to Access Your PI. In most cases, you have the right to look at or get copies of your PI that we have, but you must make the request in writing. However, we reserve the right to confirm the identity of the person seeking access to personal information at or before complying with any access requests. Summary information is available upon request. More detailed requests, which require archive or other retrieval costs, may be subject to a small fee. In certain situations, we may deny your request for access. If we do, we shall explain why. Your rights to access your personal information are not absolute. We may deny access when:

- denial of access is required or authorized by law;
- we have disclosed information to a government institution for law enforcement or national security reasons;

- information relates to existing or anticipated legal proceedings against you;
- when granting you access would have an unreasonable impact on other people's privacy;
- when granting access could harm an individual's life or security;
- to protect our organization's rights and property; or where the request is frivolous or vexatious.

Chinese Tea Culture Canada Inc. does not use your Social Insurance Number as a way of identifying or organizing the information we hold upon you.

B. The Right to Receive an Accounting of Uses and Disclosures. You have a right to request and receive a list of instances in which we have disclosed your PI to third parties. We will attempt to be as specific as possible in identifying the organizations to which we have disclosed your PI. At a minimum, we will provide you a list of organizations to which we may have disclosed your PI.

C. The Right to Correct or Update Your PI. If you believe that there is an error or omission in your PI, you have the right to request that we correct the error or omission. You must provide the request and your reason for the request in writing. If you can establish that the information we hold is inaccurate, we will take reasonable steps to correct it. We will also take reasonable steps to advise any third parties to whom we have disclosed your personal information of the correction. If we refuse your request to correct information, we shall explain why.

#### V. COMMUNICATING WITH US

E-mail is not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information.

#### VI. CHANGES TO PRIVACY POLICY

We reserve the right to change the terms of this our Privacy Policy at any time. Any changes to our Privacy Policy will apply to the PI we already have in our possession, or information we may collect in the future. When we make an important change to our Privacy Policy, we will publish the new policy.

#### VII. REQUEST FOR ACCESS/CORRECTION

If you have any questions about this Privacy Policy, or if you wish to correct or access your personal information, please contact our Chief Privacy Officer at: Chinese Tea Culture Canada Inc., 11 Progress Avenue, Unit 24, Scarborough, Ontario, Canada M1P 4S7 Attn: Chief Privacy Officer Or you may contact our Chief Privacy Officer directly at 416-901-8388 or [info@c-tea-ca](mailto:info@c-tea-ca). If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at: 112 Kent Street, Ottawa, Ontario K1A 1H3 Tel: 1-800-282-1376 Web site: [www.privcom.gc.ca](http://www.privcom.gc.ca)

#### VIII. EMPLOYMENT INQUIRIES

If you apply to Chinese Tea Culture Canada Inc. for a job, we need to consider your personal information, as part of our review process. We normally retain information from candidates after a decision has been made, unless you ask us not to retain the information. If we offer you a job, which you accept, the information will be retained in accordance with our privacy procedures for employee records.

#### IX. WEB SITE

Our web site contains links to other web sites that are provided and maintained exclusively by third parties. Web sites provided and maintained by third parties are not subject to this Privacy Policy. Please review the privacy policies on those web sites to determine their information handling practices. On our web site, like most other commercial websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.

#### X. EFFECTIVE DATE OF THIS POLICY

This policy went into effect on January 2020