

# PRIVACY POLICY

**Last Revised:** January 29, 2019.

This Privacy Policy: (i) identifies how we use the Personal Data (defined below) you provide us and (ii) informs you of what choices you have with respect to our use of your Personal Data.

Please contact us with any questions you have about this Privacy Policy at: [privacy@vantage.co](mailto:privacy@vantage.co)

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## 1. WHAT INFORMATION WE COLLECT

(a) Personal Data. “Personal Data” is information that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data. Personal Data is required when you use register or create an account; purchase products; request information from us; sign up for emails; enter a contest, sweepstakes or other promotion; fill out a survey; request customer support; or otherwise communicate with or contact us and use our Service. We may also connect Personal Data you provide by interacting with us through social media or other forums.

(b) Non-Personal Data. “Non-personal Data” is data that is not associated with or linked to your Personal Data; and does not, by itself, permit the identification of individual persons. We may use a variety of technologies such as cookies, web beacons, embedded scripts, or other technologies to collect Non-Personal about visitors to, and users of, our website and interactions with our emails and online and mobile advertisements, and to allow us to keep track of analytics and certain statistical information. This may include:

i. Analytics and Log Files. We may automatically collect certain information from you, including but not limited to your browser type, device type and model, operating system, unique device identifier of any of your computer(s) or device(s) that are used to access our Services, software version, Internet Protocol (IP) address, geo-location, preferred language, and the domain name from which you accessed our Services.

ii. Cookies, Web Beacons, And Other Technologies. We use cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to recognize you and/or your device(s) on, off and across different Services and devices. For detailed information on the cookies we use, the purposes for which we use them, see below.

a. Cookies. We use many different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit [aboutcookies.org](http://aboutcookies.org) for detailed guidance. Cookies allow us to identify and authenticate visitors, track aggregate behavior, and enable important site features. We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period, and we use that to identify you should you return to our website and want to find information that you had started even if you are not logged in, or don't have a user account. Persistent cookies may also be used if you click over from one of our affiliate partner websites - we will store a reference number identifying the website that referred you so they can get credit if you make a purchase - they do not receive any information about our clients ever, and the cookie contains no personal information. Session cookies are used to maintain your shopping state as you browse through the site. We also contract with analytics services, third party affiliate services, and third-party advertising companies to collect similar information for specific purposes. The use of cookies by our partners is not covered by this Privacy Policy. Though you may disable cookies through your web browser, doing so may prevent you from taking advantage of some of the Sites' features. To opt out of these collection services, please see the section "Your Choices" below. The use of cookies by our partners is not covered by this Policy. To opt out of the services related to these cookies, please see section "Your Choices" below.

b. WebBeacons/Tags. We automatically collect aggregate anonymous information through web beacons. We may also deliver a file to you through the websites (known as a "web beacon") from an advertising network with which we have contracted. Web beacons allow third parties to provide anonymized, aggregated auditing, research and reporting for us.

c. Targeted Advertising. Third-party advertising companies serve ads on our behalf across the Internet. They may collect anonymous information about you through

cookies and/or web beacons on our Services sites, and then display targeted ads on various sites that you visit. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by [clicking here](#) (or if located in the European Union [click here](#)). Please note this does not opt you out of being served ads. You will continue to receive generic ads, or, to opt out of third-party advertising or analytics, please see section "Your Choices" below.

d. Social Media Features Services may include social media features from providers, such as Facebook, Instagram and others. These features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly through Services. Your interactions with these features are governed by the privacy statement of the company providing it.

## 2. HOW WE USE INFORMATION

We use your Personal Data to:

- provide you with Services that you have requested or agreed to receive.
- contact you with information, newsletters, and promotional materials.
- enable you to participate in a variety of features, such as sweepstakes, message boards, other communication features, user-generated content functions, and interactive features.
- review the usage and operations of our Services, develop new products or services, and conduct analysis to enhance or improve our content, products, and Services.
- provide you with customized content, targeted offers, and advertising through our Services.
- use your data in an aggregated non-specific format for analytical and demographic purposes.
- address problems with Services and to protect the security or integrity our business.

## 3. WHO WE SHARE YOUR DATA WITH

We share your Personal Data as follows:

(a) Service Providers. We may share your information with third-party service providers that provide business, professional, or technical support functions that make Services available to you.

(b) Co-Branded Relationships. Certain areas of our Services may be provided to you in association with third parties, such as advertisers that provide products and services or rewards programs. We may share information with these third parties if you participate in a co-branded, co-sponsored, or jointly presented promotion, contest, survey, voting feature, or service.

(c) Sweepstakes, Contests, and Other Promotions. If you choose to enter one of our promotions, we may disclose your information to third parties or the public relating to the administration of the promotion, as required by law, as otherwise permitted by the promotion's official rules, or otherwise in accordance with the terms of this Privacy Policy.

(d) Third Parties. We do not share personal data with third parties for their direct marketing purposes without your permission.

(e) Legal Matters; Safety. We may access and disclose your information to respond to subpoenas, judicial processes, or government requests and investigations, or regarding an investigation on matters related to public safety, as permitted by law, or otherwise as required by law. We may disclose your information to protect the security of Services including our servers, network systems, and databases. We also may disclose your information as necessary, if we believe that there has been a violation of our Terms of Use, any other legal document or contract related to our services, or the rights of any third party.

(f) Sale or Transfer of Business or Assets. We may sell or purchase assets during the normal course of our business. If another entity acquires us or any of our assets, information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties.

(g) Non-personal Data. We may share aggregate, anonymous, or de-identified non-personal data with third parties for their marketing or analytics uses.

#### **4. OUR COMMITMENT TO DATA SECURITY**

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. We regularly monitor our systems for possible attacks and vulnerabilities, but we can't warrant the security of the data you send us even with the safeguards we have put in place.

#### **5. OUR COMMITMENT TO CHILDREN'S PRIVACY**

Our privacy practices are consistent with the Federal Children's Online Privacy Protection Act ("COPPA") and we will not knowingly request or collect personal information from any child under the age of majority. If you are a minor, your parent(s) or guardian(s) must complete the registration process, in which case he/she/they will take full responsibility for all obligations under this Privacy Policy. **BY ESTABLISHING AN ACCOUNT, YOU REPRESENT THAT YOU ARE AN ADULT AND ARE EITHER ACCEPTING THIS AGREEMENT AND THE TERMS OF USE ON BEHALF OF YOURSELF OR ON BEHALF OF YOUR CHILD, IN WHICH CASE YOU AGREE TO BE PERSONALLY BOUND BY ALL OF THE TERMS AND CONDITIONS CONTAINED HEREIN.**

#### **6. YOUR CHOICES**

(a) How You Can Access or Correct Your Information. You can access a variety of your personally identifiable information that we collect online and maintain it either online, or by contacting our customer service representatives via email at [privacy@vantage.co](mailto:privacy@vantage.co). We use this procedure to better safeguard your information. You can correct factual errors in your personally identifiable information by sending us a request that credibly shows error. To protect your

privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections.

(b) How You Can Request for Your Information To Be Deleted. You can ask us to erase or delete all or some of your personal data (provided it is no longer necessary for legal purposes or to provide Services to you). You may place a request by contacting our customer service representatives via email at [privacy@vantage.co](mailto:privacy@vantage.co). We will delete all your personal data that we are not legally required to maintain within 30 days. We will also take reasonable steps to verify your identity before proceeding with deletion. Please realize that if you initialize this request while you have outstanding orders, those orders will be cancelled.

(c) Opting out of Communications.

- i. Email. Any subscription to various marketing e-mails can be cancelled by clicking the "unsubscribe" links in the e-mails, changing preferences in the "Your Account" area online, sending a request to [privacy@vantage.co](mailto:privacy@vantage.co).
- ii. Targeted Advertising. If you do not want information about your activity on our sites to be used for tailored advertising, please visit the [opt-out](#) page hosted by the Network Advertising Initiative and follow the instructions there.
- iii. Analytics. You may opt-out of Google Analytics by [following this link](#).
- iv. Google AdWords. Google AdWords remarketing service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the [Google Ads Settings page](#).
- v. Cookies. You may disable, or delete cookies in your Web browser, but doing so may impact the usability of the website. To block cookies, you can also browse the site using your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.)
- vi. Contests. From time to time, we may provide you the opportunity to participate in contests, sweepstakes, surveys and/or other promotions through Services. If you participate, we will request certain personal information from you. Participation in these contests, sweepstakes, surveys and/or promotions is completely voluntary, and you therefore have a choice about whether or not to disclose this information. We may use a third-party service provider to conduct these surveys or contests; in those cases, that company will be prohibited from using our users' personally identifiable information for any other purpose. We will not share the personal data you provide through a contest, sweepstakes, survey and/or promotion with other third parties unless we give you prior notice and choice.

## **7. CROSS-BORDER DATA TRANSFERS**

Information, including information collected in the European Economic Area ("EEA") may be transferred, stored and processed by us and our services providers in the United States and other countries whose data protection laws may be different than the laws of your country. We will protect your Personal Data in accordance with this Privacy Policy wherever it is processed and take appropriate steps to protect the information in accordance with applicable laws.

If you live in the EEA, or a similar international area, you may have additional privacy rights available to you under applicable laws. We will process your requests in accordance with applicable data protection laws. If you would like to exercise any of the below rights, please contact [privacy@vantage.co](mailto:privacy@vantage.co) so that we may consider your request in accordance with applicable law:

- (a) Right not to provide or withdraw consent: You have the right not to provide or withdraw your consent at any time.
- (b) Right of access: You may have the right to access the Personal Data that you provided us.
- (c) Right of erasure: You may have the right to the erasure of Personal Data that we hold about you.
- (d) Right to object to processing: You may have the right to request that we stop processing your Personal Data and/or to stop sending you marketing communications.
- (e) Right to rectification: You may have the right to require us to correct any of your Personal Data.

## **8. YOUR U.K. PRIVACY RIGHTS**

Users from the U.K. have the right to ask us to amend or limit the processing of their Personal Data, (as defined by U.K. law) and in particular not to process their Personal Data for marketing purposes. We will inform you (before collecting your personal data) if we intend to use your Personal Data for such purposes or if we intend to disclose your Personal Data to any third party for such purposes. You can exercise your rights to prevent such processing by checking certain boxes on the forms we use to collect your Personal Data. You can also exercise the right at any time by contacting us at: [privacy@vantage.co](mailto:privacy@vantage.co).

The U.K. Data Protection Act 1998 (“the DPA 1998”) gives users from the U.K. the right to access information held about you. Your right of access can be exercised in accordance with the DPA 1998. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **9. NOTICE TO CANADIAN RESIDENTS**

As with California residents, Canadian residents are entitled to receive certain information about the collection, use and disclosure of their Personal Data. We collect, use, and disclose your Personal Data with your consent, which may be express or implied. You may withdraw your consent to the use and disclosure of your Personal Data by contacting us as specified below by contacting us at: [privacy@vantage.co](mailto:privacy@vantage.co).

## **10. CALIFORNIA PRIVACY RIGHTS**

Section 1798.83 of the California Civil Code entitles residents of California to request a notice detailing the categories of Personal Data that we has shared with third parties for direct marketing purposes during the preceding calendar year, as well as the identity of those third parties. To request a copy of your Personal Data maintained by us, please contact us as at: [privacy@vantage.co](mailto:privacy@vantage.co) for assistance and/or questions you may have.

## **11. OTHER SITES LINKED TO SERVICES**

Services may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## **12. UPDATES**

This Privacy Policy was last updated on the date identified above and we accordingly reserve the right to change or modify this policy at any time without prior notice, and we may apply any change in the Privacy Policy to information previously collected, as permitted by law. Please review our Privacy Policy before you provide any Personal Data and periodically on an ongoing basis. When we make material changes to this Privacy Policy, we will notify you by posting the updated Privacy Policy on Services noting the "Last Revised" date at the top of the Privacy Policy. Your continued use of Services after any changes or revisions to this Privacy Policy become effective shall indicate your agreement with the terms of the then-current Privacy Policy.

## **13. DOWNLOAD A COPY OF OUR PRIVACY POLICY.**

You can download a PDF version of our Privacy Policy here: <http://www.vantage.co/privacy-policy>

## **14. CONTACT US**

If there are any questions regarding this privacy policy, you may contact us using the information below.

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Richmond, BC V6W1J7  
Canada  
[privacy@vantage.co](mailto:privacy@vantage.co)  
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