# **PRIVACY POLICY**

At Waterloo Brewing LTD. ("Waterloo Brewing"), we recognize that privacy is important, this Privacy Policy sets out the manner in which Waterloo Brewing collects, uses, discloses and otherwise manages personal information. Waterloo Brewing may modify this Privacy Policy from time to time without notice to you, and you should review this Privacy Policy on a regular basis for any such changes.

### Information we collect and how we use it:

We offer a number of products and services that may not require you to register for an account or provide any personal information to us. However, in order to provide our full range of products and services, we may collect the following types of information:

**1** Information you provide - Waterloo Brewing may collect personal information supplied by you from time to time including:

- 1. When you sign up for a contest or other promotional service or website that requires registration, we ask you for personal information such as your name, email address and an account password, address, telephone number, date of birth, gender or other personal information.
- 2. If you participate in market research for Waterloo Brewing we may collect personal information such as your name, email address, address, telephone number, date of birth, gender, your consumer habits or preferences or other personal information.
- 3. If you contact Waterloo Brewing to make a request, complaint or to provide feedback to Waterloo Brewing we may collect personal information such as your name, email address, address, telephone number, date of birth, gender, particulars of your inquiry or complaint or other personal information All personal information will be used only for the purposes for which it was provided, unless we obtain your consent to use such information for additional purposes.

**2** Waterloo Brewing cookies - When you visit our website, we send one or more cookies - a small file containing a string of characters - to your computer that uniquely identifies your browser. We use cookies to improve the quality of our service by storing user preferences and tracking user trends, such as how people search. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent.

However, some promotion or contest features and services may not function properly if your cookies are disabled.

**3** Log information - When you use our websites, our servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request, referring/exit pages and URLs, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages and one or more cookies that may uniquely identify your browser.

**4** Clear Gifs Information- When you use our websites, we may employ "clear gifs" (a.k.a. Web Beacons) which are used to track the online usage patterns of our users anonymously (i.e., in a non-personally-identifiable manner). In addition, we may also use clear gifs in HTML-based emails sent to our users to track which emails are opened by recipients.

**5** User communications - When you send email or other communication to info@waterloobrewing.com, we may retain those communications in order to process your inquiries, respond to your requests and improve our services.

**6** Links – our websites may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve the quality of our search technology, customized content, and advertising.

**7** Other sites - This Privacy Policy applies to web sites and services that are owned and operated by Waterloo Brewing LTD. We do not exercise control over the sites displayed as links from within our various services. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you.

We may utilize personal information we collect for one or more of the following purposes (i) to provide products or services to you; (ii) to identify who you are, (iii) to administer contests and promotions, (iv) to contact you for marketing or promotional purposes, (v) to improve upon or personalize the content and layout of our websites, (vi) to notify you of changes to our websites, (vii) to improve upon our products and services (viii) to process inquiries or complaints, and (ix) such other purposes as may be identified at the time of collection.

### Choices for personal information

When you sign up for a service that requires registration, we may ask you to provide personal information. If we propose to use personal information for any purposes other than those described in this Policy or in the specific service notices, you may opt out of the use of personal information for those other purposes. We will not collect or use personal information for purposes other than those described in this Policy or in the specific service notices, unless we have obtained your prior consent. You can decline to submit personal information to Waterloo Brewing, in which case Waterloo Brewing may not be able to provide those services to you.

### Information sharing

Waterloo Brewing only shares personal information with third parties in the following limited circumstances:

- 1. We have your consent.
- 2. We provide such information too our affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on

our instructions and in compliance with this Policy and any other appropriate confidentiality and security measures.

- 3. We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to:
  - 1. Satisfy any applicable law, regulation, legal process or enforceable governmental request,
  - 2. Enforce Waterloo Brewing 's Terms of Use including investigation of potential violations thereof,
  - 3. Detect, prevent, or otherwise address fraud, security or technical issues, or
  - 4. Protect against imminent harm to the rights, property or safety of Waterloo Brewing, its users or the public as required or permitted by law.

### Information security

We take appropriate security measures to protect against unauthorized access to, or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data. We restrict access to personal information to Waterloo Brewing 's employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations subject to enforcement, if they fail to meet these obligations. Notwithstanding the security measures taken by Waterloo Brewing, you acknowledge

Notwithstanding the security measures taken by Waterloo Brewing, you acknowledge that the internet and electronic communications are not secure mediums. Waterloo Brewing does not represent, warrant or guarantee that personal information will be secure and you acknowledge that you submit personal information at your own risk.

## Data integrity

Waterloo Brewing processes personal information only for the purposes for which it was collected and in accordance with this Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

## Accessing and updating personal information

When you use Waterloo Brewing 's services, we make good faith efforts to provide you with access to your personal information, either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we

provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

#### Compliance

Waterloo Brewing regularly reviews its compliance with this Policy. Please feel free to direct any questions or concerns regarding this Policy or Waterloo Brewing 's treatment of personal information by contacting us through this website.