PRIVACY POLICY

Last Updated: August 10, 2018

Conestoga Students Inc. ("CSI", "We", "Our", or "Us"), takes the privacy and protection of Personal Information seriously. By accessing the CSI mobile application, or otherwise using the services associated therewith (collectively, the "Services"), you hereby acknowledge that You accept the practices and policies outlined in this privacy policy ("Privacy Policy"). Unless otherwise defined herein, capitalized terms shall have the meanings assigned to such terms in the Terms of Use Agreement which incorporate this Privacy Policy by reference.

This Privacy Policy describes CSI's practices with respect to Your Personal Information and other non-personal information, including location data, such as latitude, longitude and direction, and all information You choose to provide as input, as well as any and all results of that input, as generated by the Services, and activity statistics (collectively, the "Information") that We collect when You use the Services. This Privacy Policy does not apply to the use of Information that is collected by third parties that CSI does not own or control or that do not support CSI in providing the Services.

BY USING THE SERVICES OR SUBMITTING INFORMATION THROUGH THE SERVICES, YOU EXPRESSLY CONSENT TO THE PROCESSING OF YOUR INFORMATION ACCORDING TO THIS PRIVACY POLICY.

YOUR INFORMATION MAY BE PROCESSED AND/OR STORED IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS OTHER COUNTRIES (INCLUDING CANADA AND THE U.S.) WHERE LAWS REGARDING PROCESSING OF INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY AND BY USING THE SERVICES OR SUBMITTING INFORMATION THROUGH THE SERVICES, YOU ARE EXPRESSLY CONSENTING TO SUCH PROCESSING AND/OR STORAGE OF YOUR INFORMATION.

USE OF INFORMATION

We may use Your Information for Our own internal purposes, including, but not limited to, contacting you by e-mail. We reserve the right to disclose Information where such disclosure is required by law, considered necessary to prevent or investigate an apparent breach of law, and/or in any other instance where the applicable privacy or other legislation permits such disclosure. We may share Your Personal Information with your consent. Personal Information does not include "aggregate" information, which is data We collect about or through the Services from which individual identities or other personal information has been removed. This Privacy Policy in no way restricts or limits Our collection and use of aggregate information. We may share aggregate information and other information that does not identify You with third parties without Your consent.

We may disclose Information to third parties, including, but not limited to customer service agencies for research and analysis purposes so that We can monitor and improve the Services We provide, and to Our service partners and partner retailers.

The Services may also send push notifications to Your mobile device. If You have previously consented to receiving push notifications and no longer wish to receive them, You can also turn push notifications off at the device level. The Services may also request access to Your device's calendar application, camera and/or photo gallery. If You have previously allowed access to Your device's calendar, camera and/or photo gallery, and no longer wish to allow access, You may edit the application settings at the device level.

FEEDBACK

If You provide feedback about the Services to Us, We may use and disclose such feedback for any purpose, provided We do not associate such feedback with Your Personal Information. We will collect any information contained in such feedback and will treat the Personal Information in it in accordance with this Privacy Policy. We shall have a royalty-free, worldwide, irrevocable, perpetual license to use and incorporate into the Services any suggestions, enhancement requests, recommendations or other feedback provided by You, relating to the operation of the Services.

3. SECURITY AND RETENTION

As We are committed to protecting the security of your Information, We employ a number of security information technologies and procedures designed to help protect your Information from unauthorized access, use and/or disclosure. We will retain your Information for a reasonable period or as long as the law requires. While We endeavor to limit access to your Information, We are not responsible for the retention or use of Information obtained by other third parties who have gained access to Our database. If you believe your Personal Information has been compromised, please contact us. If We learn of a security systems breach, We will inform you and the authorities of the occurrence of the breach in accordance with applicable law. We will only keep your Personal Information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with Our legal and regulatory obligations.

4. THIRD-PARTY SERVICES

The Services may contain features or links to websites and services provided by third parties. Any information You provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Services. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage You to learn about third parties' privacy and security policies before providing them with information.

5. AMENDMENTS

We may update this Privacy Policy from time to time as the need arises. We will post any updated Privacy Policy at this link together with the date on which it was revised. Such changes become effective immediately upon posting. If You do not agree to be bound by (or cannot comply with) the Privacy Policy as amended, Your only remedy is to cease using the Services. You will be deemed to have accepted the Privacy Policy as amended five (5) days after the updated version of the Agreement is posted if you continue to use the Services. All other terms of this Privacy Policy will continue in effect.

6. CONTACT

If You have any questions or comments about this Policy or your Personal Information, to make an access or correction request, to exercise any applicable rights, to make a complaint, or to obtain information about Our policies and practices with respect to any service providers outside Canada, Our Privacy Officer can be reached by mail or email using the following contact information:

Conestoga Students Inc. Attention: Privacy Officer 299 Doon Valley Dr. Kitchener, ON N2G 4M4