

## Privacy Notice

This Privacy Policy sets out the privacy policies and practices for Cinnagard Inc. with respect to our collection, use, and disclosure of personal information. This Privacy Policy may be updated by Cinnabon Inc. giving reasonable notice of the revised terms (including by e-mail or by posting on the Site), and this Privacy Policy may be supplemented or modified by agreements entered into between Cinnagard Inc. and an individual from time to time.

In this Privacy Policy, "personal information" means any information about an identifiable individual, as further defined under applicable Canadian laws.

### Collection and Use of Personal Information

Cinnagard Inc. collects and uses personal information from customers and others (an "Individual") as follows:

- Cinnagard Inc. may collect and maintain personal information such as an Individual's name, contact information, payment card information and purchase history when an Individual subscribes for services or purchases products on our website, in one of our Bakeries or at a kiosk.
- Cinnagard Inc. may collect personal information from an Individual where the Individual submits an application for an employment opportunity (such as that contained in a resume, cover letter, or similar employment-related materials). We use submitted personal information as is reasonably required to assess the Individual's suitability for employment at Cinnagard Inc. as well as to process the application and respond to the Individual.
- When participating in a contest or promotion, we may collect personal information, such as a contest winner's name, city of residence, and prize winnings in order to award prizes and promote such contests. This information may be published in connection with contests.
- From time to time, we may obtain an Individual's consent to use the Individual's contact information to provide periodic newsletters or updates, announcements and special promotions regarding Cinnagard Inc. products and services.
- Cinnagard Inc. may collect demographic and profile data in connection with the Sites and, together with publicly available information, we use such data to tailor each Individual's experience at the Sites and display content according to an Individual's preferences.
- In order to use certain features on the Sites (such as to make publicly available personal information about yourself and others, including without limitation, photos and videos), an Individual may be required to register and provide personal information such as name, email address, location (i.e. city, province, postal code), date of birth and a user name and password that the Individual chooses. We use this information to identify you, provide the requested feature and, with respect to date of birth, to verify that you meet the minimum age requirement. Your username, city and province will be published with your posting. By making publicly available his or her personal information on the Sites, the Individual consents to the publication of such personal information. By publishing personal information about another individual, the Individual represents that he or she has, where required by applicable privacy laws, obtained the consent of such individuals to publish such information.
- The "Send to a Friend" and other similar features on our Sites permit an Individual to send email to others. This feature requires an Individual to submit their name and email address, as well as the name and email address of

the recipient. We do not use the names or email addresses submitted in these circumstances for any other purpose without the consent of the Individual or the email recipient to do so.

- When you contact us with a comment, question or complaint, you may be asked for information that identifies you (such as your name, address and a phone number) along with additional information we need to help us promptly answer your question or respond to your comment or complaint. We may also retain this information to assist you in the future and to improve our customer service and product and service offerings. Cinnagard Inc. may otherwise use customer information for additional purposes that are identified at or before the time that the information is used for such additional purposes.

## **Disclosure of Personal Information**

Cinnagard Inc. will not disclose, trade, rent, sell or otherwise transfer personal information for purposes other than as those set out herein, except with an Individual's consent or as required or permitted by law. Cinnagard Inc. may transfer or disclose personal information as follows:

- Cinnagard Inc. may transfer your personal information to third-party service providers or agents who provide services to or on behalf of Cinnagard Inc. such as hosting, data management and storage services, market analyses, assessment and evaluation of prospective franchisees and retention services. Either Cinnagard Inc. or such third party service provider may use servers for such purposes located in the United States or another foreign country. The personal information of an Individual may be processed and stored in the United States or such other foreign country, and the governments, courts or law enforcement or regulatory agencies of that country may be able to obtain disclosure of personal information through the laws of the foreign country.
- Cinnagard Inc. and our Canadian, US and other service providers may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by applicable Canadian, US or other law. We may also disclose personal information where necessary for the establishment, exercise or defence of legal claims.
- We may transfer any information we have about you as an asset in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Cinnagard Inc. or as part of a corporate reorganization or stock sale or other change in corporate control.

## **Cookies and IP Addresses**

Cinnagard Inc. collects and uses an Individual's IP address to help identify the Individual, gather broad demographic information about users of the Sites, diagnose problems with Cinnagard Inc.'s systems, and administer the Sites. Depending on an Individual's browser settings, the Sites may use cookies. A cookie is a tiny element of data that our Sites can send to an Individual's browser, which may then be stored on their hard drive so we can recognize them when they return to the Sites. We use cookies to deliver content according to the Individual's preferences and to save the Individual's password so that the Individual is not required to re-enter it while the Individual uses the Sites. If an Individual's browser settings do not accept cookies from our Sites, they may not be able to take advantage of all of the features of our Sites.

## **Third party links**

Our Sites may contain links to other sites that Cinnagard Inc. does not own or operate. Also, links to our Website may be featured on third party websites on which we advertise. Except as provided herein, Cinnagard Inc. will not provide

an Individual's personal information to these third parties without the Individual's consent. We provide links to third party websites as a convenience to Individuals. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy statements, notices and terms of use, which we recommend Individuals read carefully. Cinnagard Inc. does not have any control over such websites, and therefore has no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat an Individual's personal information.

## Security

Cinnagard Inc. has implemented measures designed to protect against the theft, loss, unauthorized access, use, disclosure and alteration of personal information in our custody and control with security measures appropriate to the sensitivity of the information, including through the use of reasonable physical, organizational, and technological safeguards and appropriate training of employees. Cinnagard Inc.' third party service providers are obligated to maintain confidentiality and security of the personal information transferred to them and are not authorized to use such information other than to provide the services or as otherwise permitted by law.

An Individual's online access to certain of their personal information may be protected with a username and/or password that the Individual chooses. Cinnagard Inc. strongly suggests that Individuals do not disclose their username or password to anyone. Cinnagard Inc. never asks for an Individual's password in any unsolicited communication. Cinnagard Inc. retains personal information only as long as necessary for the purposes outlined in this Privacy Policy or as required or permitted by law.

## Contact

If an Individual has any questions about this Privacy Policy or the collection, use, disclosure, or retention of the Individual's personal information by Cinnagard Inc. or its service providers, please contact us as follows:

Postal: Mail 120 Main St Suite 3 Cambridge, Ontario Canada N1R 1V7

Email: [admin@cinnabon.ca](mailto:admin@cinnabon.ca)

Fax: 1 519 622 3187