



BGC DOVERCOURT PRIVACY POLICY

Last Revised: 2024-02-27

BGC Dovercourt Club (collectively, “Dovercourt”, “us”, “our” or “we”) values your privacy and cares about the treatment of your personal information.

This Privacy Policy (“Policy”) describes the personal information we may collect, use, disclose and about individuals who access or use our website, register for our programs or otherwise access or use our services, as well as our personal information handling practices.

This Policy does not apply to the personal information that we collect and process about job applicants and candidates for employment with us, or to employees in the context of our working relationship with them.

By providing personal information to us, you agree to the collection, use and disclosure of your personal information set out in this Policy as well as authorize Dovercourt, its third parties and service providers to process your personal information for the purposes set out below.

I. COLLECTION OF PERSONAL INFORMATION

For the purposes of this Policy, “personal information” is information about an identifiable individual. Personal information does not include business contact information except as required by applicable privacy law.

Personal Information Collected Directly from Visitors, Members or Their Guardians (“You”). While the personal information we collect varies depending upon your use of our website and our interactions with you, in general, we may collect the following personal information directly from you:

- **Contact Information.** When you contact us, or register for our programs or services including if you send us a message, we may collect your name, email address, phone number, or other similar identifiers, as well as your message, the nature of your inquiry, and any other information you so choose to provide.
- **Communications and Interactions.** When you email, call, or otherwise communicate or interact with us, including if you sign up for our mailing lists, interact with our social media pages, post a review or testimonial, submit content through our website, or otherwise enter information into public-facing comment fields, blogs, or community forums sponsored by or affiliated with Dovercourt, we may collect and maintain records of your contact details, communications and interactions, and your posts or submissions.
- **Promotional Information.** If you agree to receive marketing communications from us, we may collect your name, email address, phone number, preferences, and if relevant, information about your account and profile, including the website and features you use. If you participate in special activities, offers, programs, or promotions we offer, we may also collect certain contact details, your age, and any other information that may be required by law.
- **Events and Registration Details.** We also may collect personal information related to your participation in our events, as well as other requests that you submit to us related to our website. For example, if you register for or attend an event that we host or sponsor, we may collect

information related to your registration for and participation in such event.

- **Preferences and Other Requests.** We may also collect information about your preferences, including communications preferences, preferences related to your use of our Website, and any other preferences or requests you provide when interacting with us.
- **Members' and their guardians' personal information.** Where required by law, by licensing or regulatory authorities (including but not limited to the Ministry of Education and the City of Toronto), by school authorities or in order to provide services, we will collect personal information about the members who are registered or wish to register for our programs and about their guardians with the consent of the guardian where such consent is required by law. Please note that, in some circumstances, failure to provide consent to the collection of personal information may not allow us to provide services, and we may have no option but to deny the provision of such services. Similarly, there may be circumstances where we may be prohibited from disclosing personal information regarding our employees, our members and/or guardians without their consent.

Dovercourt also collects the following types of personal information through our site:

- **Website activity and usage information.** When you visit our website) and when you communicate with us, we may collect a certain amount of personal information about visitors, members and their guardians. Specifically, Dovercourt may collect the following information regarding visitors to our website: domain name, information regarding your interaction with Dovercourt's website, social media sites and mobile applications (including content viewed or downloaded, features used, links clicked, etc.). Like most websites and other Internet services, we may collect certain technical and device information about your use of the website, including but not limited to information concerning the type of device, internet browser, language or computer operating system you are using, your IP address, your location, the domain name of your internet service provider, access times, referring website information, and other information you provide to us.

Links to Other Sites

Our website may contain links to third-party software, websites, applications or Internet resources (“**Third-Party Services**”) that are provided solely for your convenience and information. When you click on one of those links you are contacting those Third-Party Services. We do not endorse, and have no responsibility or liability for, or control over, those Third-Party Services or their processing of your personal information. We encourage you to read their privacy policies to learn how they process your personal information.

Cookies and Tracking

To the extent permitted by applicable law and, where required, with your consent, Dovercourt does not use cookies and other tracking mechanisms to track information within our website.

A “cookie” is a unique identifier which is used by us to customize your website, or social media site experience. Cookies can enhance your user experience by, for example, saving your preferences and personalizing your online experience. Some cookies allow us to make it easier for you to navigate our Site, while others are used to enable a faster log-in process, support the security and performance of the Site, or allow us to track aggregate and statistical information about user activity within the Site.

Dovercourt also uses the information collected in cookies for the purposes of helping to improve its website(s), mobile applications, social media sites and services.

Most web browsers automatically accept cookies, but you can usually change your browser to prevent or notify you whenever you are sent a cookie. This gives you the opportunity to decide whether or not to accept the cookie. Although you are not required to accept cookies when you visit our websites, you may be unable to use all of the functionality of the site if you reject certain cookies.

Third Party Analytics. We may use automated devices, applications, and tools, such as Google Analytics, which are operated by third party companies, to evaluate usage of our website. These third-party companies may use cookies, pixels, and other tracking technologies to collect usage data about our Site and provide us with reports and metrics that help us evaluate usage of our Site and enhance performance and user experiences. To learn more about Google’s privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/partners/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent your data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

Cookie Preferences/Targeted Advertising. You may manage your preferences regarding cookies, targeted advertising, and other similar tracking mechanisms through your browser and device. Many of these choices are browser and device specific, which means that you may need to set the preference for each browser and device you use to access our Site. In addition, if you delete or block cookies, you may need to reapply these preferences to each browser and/or device. Further, opting out of cookies and advertising does not mean that you will no longer receive advertising content from us, and you may continue to receive generic or “contextual” ads from us.

- **Cookie Settings.** To prevent cookies from tracking your activity on our Sites or visits across multiple websites, you can set your browser to block certain cookies or notify you when a cookie is set. You can also delete cookies. The “Help” portion of the toolbar on most browsers will tell you how to prevent your device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to delete cookies. Visitors to our Sites who disable cookies will be able to browse the Sites, but some features may not function.
- **Browser Signals.** To the extent required by applicable law, if our Sites detect that your browser is transmitting an opt-out preference signal, such as a “global privacy control” (or GPC) signal, we will apply that signal to opt that particular browser on your device. If you come to our Site from a different device or from a different browser on the same device, you will need to apply GPC for that browser and/or device as well.

II. PURPOSE FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Dovercourt may collect, use and disclose your personal information for the following non-limited purposes:

- to administer Dovercourt’s provision of, and your payment for, services that you request from Dovercourt;
- to meet compliance requirements for the delivery of our programs, including but not limited to licensing and other legal requirements applicable to licensed child care providers, and to the delivery of pre- and after-school programs;

- to authenticate your identity;
- to operate, customize and improve the quality of the website, social media sites, and services;
- to tailor content we may send or display on the website, including to offer location customization and to otherwise personalize your experiences and offerings;
- to monitor your compliance with any of your agreements with Dovercourt;
- to provide newsletters, electronic messages and information you request from Dovercourt;
- to provide other information to you regarding Dovercourt's services unless you opt out of receiving that information;
- to assess and implement business transactions, and to operate our business and administer our business, accounting, auditing, compliance, recordkeeping, and legal functions;
- to conduct financial, tax and accounting audits, audits, and assessments of our operations, including our privacy, security, and financial controls, as well as for risk and compliance purposes. We may also use personal information to maintain appropriate business records and enforce our policies and procedures;
- to protect Dovercourt, yourself and others from fraud and error and to safeguard Dovercourt's business interests;
- to collect debts owed to Dovercourt;
- to obtain legal, accounting or other professional advisory advice; and
- otherwise with your consent or as required or authorized by applicable law.

In order to fulfill the above purposes, Dovercourt may disclose personal information about individuals on a selective basis to third parties as required or permitted by law or as consented to from time to time by the individual. The organizations to which Dovercourt may disclose personal information include, but are not limited to:

- government agencies or regulatory bodies;
- program funders;
- insurance companies;
- banks and other financial institutions;
- professionals advising or working on behalf of Dovercourt such as lawyers, actuaries and benefit consultants;
- vendors and service providers to Dovercourt, such as IT and website hosting and marketing research providers, customer support, data storage, data analytics providers, auditors, consultants, and legal counsel; and
- affiliates and business associates of Dovercourt, as reasonably required in connection with the operations of Dovercourt.

Note about the Collection, Use and Disclosure of Members' Personal Information

Most of our members are individuals below 18 years of age. BCG is required by to comply with the *Child Care and Early Years Act, 2014*(the “Act”) and other applicable law when providing services to these members. This means that Dovercourt is required to collect these members’ personal information in accordance with the Act for the protection of children, but will only collect, use and disclose it as required or authorized by the Act and other applicable law.

Limits on the Disclosure of Personal Information

Dovercourt may only disclose personal information in accordance with applicable law. For example, Dovercourt may not be able to disclose employee-related information to members and their guardians. Similarly, Dovercourt may not be able to disclose information to a guardian regarding a member where that information also relates to other members, guardians or employees.

III. CROSS-BORDER TRANSFERS

Dovercourt may transfer your personal information outside of your jurisdiction of residence fulfill any of the above purposes, including to service providers located in the United States and other jurisdictions outside of Canada who may be subject to access by foreign authorities in those jurisdictions in accordance with applicable law.

IV. RETENTION

Dovercourt retains your personal information for the period of time required to meet the purposes identified in this policy, except as required or authorized by applicable law, after which time your personal information is securely destroyed.

V. SECURITY

We have implemented reasonable precautions aimed to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our best efforts, no data security measures can guarantee security.

Personal information is retained and destroyed by Dovercourt in accordance with the applicable laws and its document and data retention practices.

VI. YOUR PERSONAL INFORMATION RIGHTS

ACCURACY

Dovercourt is required to take reasonable steps to ensure that your personal information in our possession is accurate and complete. You may request that Dovercourt correct an error omission in your personal information that is under our control. If you request a correction to your personal information and Dovercourt is satisfied on reasonable grounds that there is an error or omission in your personal information, Dovercourt will correct the personal information as soon as reasonably possible. If we do not correct the information, we will annotate it to show that the request was made.

REQUESTS FOR ACCESS OR CORRECTION



You may have a right to access to or request correction of your personal information held by us. These rights are not absolute but subject to limits in applicable law.

Where a request to access your personal information is refused, we will notify you in writing, document the reasons for refusal and outline further steps which are available to you. If a request for correction of your personal information is refused, we will annotate our records to show that the correction was requested but not made.

VII. CONTACT OUR PRIVACY OFFICER

Any questions or concerns regarding the application of this policy should be directed to our Privacy Officer, (Email: sheldon@bgcdovercourt.com Phone #: 416-536-4102 extension 205)

This Policy is subject to updates from time to time. Please check back regularly to review any updates. Our current version of this policy can be accessed at (bgcdovercourt.com).