# Canada Goose Privacy and Cookies Policy

Effective Date: July 11, 2018

# **INTRODUCTION**

The following is the privacy policy (the "Privacy Policy") of Canada Goose Inc. and Canada Goose International AG (together "Canada Goose", "we", "us" or "our") who act as joint controllers of the information we collect about you. Canada Goose recognizes the importance of your right to privacy and we are committed to safeguarding your personal information. This privacy policy sets out the way we use your information: what we collect, how we collect it, how we use it, why we use it, who we share it with and the rights to which you may be entitled.

# CATEGORIES OF PERSONAL INFORMATION WE COLLECT

We collect certain types of information from or about you throughout our interaction with you. This information often consists of things like your name, address, contact details and online identifiers. We use this information for the activities we have listed in the table below, including in order for us to provide our products, for marketing, reporting purposes and investigation of complaints.

	What we collect This category of information we collect about you includes:	How we use it We use this information for certain activities, including to:	Why we use it We use this information because:
Information that you give us when you make a purchase on our website or in order for us to set up and manage your account:	<ul> <li>Your contact details including: your name, address, email address;</li> <li>Your payment information;</li> <li>Other information about you such as your date of birth and language preference;</li> <li>The product(s) you have purchased;</li> <li>Your username, password and account preferences.</li> </ul>	<ul> <li>Fulfil orders, process payments and ship products purchased by you;</li> <li>Onboard you as an account holder;</li> <li>Reporting and account management;</li> <li>Process exchanges and returns.</li> </ul>	<ul> <li>It is necessary to perform our contract with you;</li> <li>We have a legitimate business interest in ensuring that we can onboard you as a customer and manage your account.</li> </ul>
Information about the way you use our products and services:	<ul> <li>Details of products you have purchased from us;</li> <li>When and where you made these purchases;</li> <li>What you paid for them and how you paid;</li> <li>Whether you've opened or clicked on links in</li> </ul>	<ul> <li>Develop new products;</li> <li>Identify Canada Goose products that may be of interest to you and marketing these to you if you have indicated that you wish to receive such marketing or if we are</li> </ul>	• We have a legitimate business interest to improve our products and services, better understand how our customers use them and ensure that we are better able to

	<ul> <li>electronic communications from us or visited pages on our website;</li> <li>Your marketing preferences;</li> <li>Marketing information (previous communication data; transaction history);</li> <li>Information you provide to us when you participate in or respond to consumer surveys or requests for opinions, concerns, and preferences regarding our products;</li> <li>Information you provide to us when you participate in contests, sweepstakes and other promotions or use other features of our website that may be offered from time to time;</li> <li>Information that we collect through your use of our website, including IP address, device information, hardware and browser settings, the pages you visit and search engine terms you use.</li> </ul>	otherwise entitled to do so by law; • Statistical analysis, research, reporting and advertising; • Notify you of product recalls or safety issues.	<ul> <li>personalise our offers to you;</li> <li>It is necessary to perform the contract;</li> <li>We need to comply with our legal obligations relating to product safety and recalls;</li> <li>In addition to the above, where we have obtained your consent to use the data in this explicit way, then we can rely on that consent.</li> </ul>
Information when you communicate with us whether in person, through our website or via email, over the phone, through social media or via any other medium:	<ul> <li>Information that you give us if you submit an employment application via our website including your resume information, employment history and educational qualifications;</li> <li>Information you provide to us when you make an enquiry, complaint, claim under our warranty program or otherwise communicate with us, whether through our website, via email or over the phone;</li> <li>Information you give us when you sign up for Basecamp;</li> <li>Your marketing preferences and marketing information.</li> </ul>	<ul> <li>Review and consider the information that you submitted in connection with your possible employment by Canada Goose and otherwise in connection with the hiring process and to respond to your application for current or future career opportunities;</li> <li>Respond to enquiries;</li> <li>Provide you with information about warranty claims;</li> <li>Monitor customer communications for quality and training purposes;</li> <li>Improve our services;</li> <li>Deal with any complaints;</li> </ul>	<ul> <li>We have a legitimate business interest in:         <ul> <li>Understanding customer</li> <li>feedback and in responding to customer</li> <li>communications in a consistent manner;</li> <li>Ensuring that we are better able to personalise our offers to you;</li> <li>Considering and assessing employment applications we receive before making any recruitment decisions;</li> <li>Ensuring that information transmitted to us</li> </ul> </li> </ul>

		<ul> <li>Identify Canada Goose products that may be of interest to you and marketing these to you if you have indicated that you wish to receive such marketing or if we are otherwise entitled to do so by law;</li> <li>Monitor information transmitted or received through our website or via email to prevent violations of our website terms of use or inappropriate content.</li> </ul>	<ul> <li>is not <ul> <li>inappropriate or</li> <li>in violation of our</li> <li>website terms of</li> <li>use.</li> </ul> </li> <li>It is necessary to <ul> <li>perform our contract</li> <li>with you.</li> </ul> </li> <li>In addition to the <ul> <li>above, where we</li> <li>have obtained your</li> <li>consent to use the</li> <li>data in this explicit</li> <li>way, then we can</li> <li>rely on that consent.</li> </ul></li></ul>
Information that we collect incidentally from other sources or public sources, including:	<ul> <li>Information that we collect where you participate in a third-party application or feature (eg. Facebook or another social platform or website) through which you allow us to collect (and/or the third party to share) personal information about you or where you are on another website and opt-in to receive information from us.</li> </ul>	<ul> <li>Maintain market awareness;</li> <li>Build and maintain social media branding, and our branding in general;</li> <li>Provide you with information about products which may interest you, if you have indicated that you wish to receive such information.</li> </ul>	<ul> <li>We have a legitimate business interest in maintaining a public profile within the media.</li> <li>In addition to the above, where we have obtained your consent to use the data in this explicit way, then we can rely on that consent.</li> </ul>

# LEGAL REQUIREMENTS

In addition to the above, your personal information may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claim. We will not delete personal information if relevant to an investigation or dispute. It will continue to be stored until those issues are fully resolved.

# AUTOMATED DECISION MAKING

We may make automated decisions on certain matters. For example, we may do this to decide whether we can provide our products to you based on fraud detection and creditworthiness checks. This will be informed by verification of your information (including by third parties). Depending on the outcome of these checks, a decision will be reached automatically as to whether we are able to provide products to you.

## FAILURE TO PROVIDE INFORMATION

Where we need to collect your personal information under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example to provide our products to you).

### HOW LONG WE WILL KEEP YOUR PERSONAL INFORMATION

We will keep your personal information for as long as it is reasonably necessary considering the purposes for which your personal information has been collected. It will depend on factors such as whether you have any outstanding purchases or an account with us or have interacted with recent offers. For further information on how long we will keep your personal information, please contact our privacy officer at Privacyofficer@CanadaGoose.com.

## DISCLOSURE OF YOUR PERSONAL INFORMATION

There are certain circumstances where we may transfer your personal data to our affiliates, contractors and to other third parties.

- We may share information about you with other members of our group of companies so that we can provide the best service across our group. They are bound to keep and use your information in accordance with this Privacy Policy;
- We may also share your information with certain contractors, service providers or advisors that help with our business operations (for example, order fulfilment, cloud services, fraud prevention, customer services, payment processing and marketing) and they may process your personal data for us. They are always required to meet our standards on processing information and security. The information we provide them with, including your information, will only be provided in connection with the performance of their function;
- If we're discussing selling or transferring part or all of our business the information may be transferred to prospective purchasers under suitable terms as to confidentiality or if sold, to buyers who can continue to provide products to you;
- We may also share your information where you have given us consent to do so or when we are otherwise required or permitted by law, for example by the Police or in defence of a legal claim.

## INTERNATIONAL TRANSFERS OF DATA

Some of the parties that collect your personal information and third parties (e.g. suppliers, service providers and affiliates) to which we may disclose your personal information may be located in countries outside the European Economic Area. As a result, your personal information may be transferred to, stored

and/or processed in such other countries, including on servers located in such other countries. This includes countries that offer a lower level of protection for your personal information than countries in the European Economic Area.

Unless you have expressly consented to the transfer of personal information, the transfer is necessary for the performance of a contract with you or concluded in your interests or the transfer is otherwise permitted by applicable data protection laws we will only transfer your personal information to a country that is deemed to have an adequate level of protection under the applicable data protection law or otherwise where we have put in place adequate safeguards to protect the personal information. In particular where we send your personal information outside of the EEA, we shall only do so where the recipient of the information is subject to:

- binding corporate rules;
- standard data protection clauses approved under applicable law;
- an approved code of conduct; or
- an approved certification mechanism.

The transfer of your information to Canada Goose International AG, a Swiss entity, is permitted on the basis of the European Commission's decision that Switzerland provides an adequate level of protection for personal data. The transfer of your information to Canada Goose Inc, a Canadian entity, and our suppliers based in Canada, is permitted on the basis of the European Commission's decision that Canada provides an adequate level of protection for personal data. We also store information on cloud servers located in the United States. The transfer of this information is governed by a contract including standard contractual clauses approved by the European Commission, or by another approved safeguard.

Further details on the safeguards adopted by us may be obtained by contacting us as set out at the end of this Privacy Policy.

# COOKIES, WEB BEACONS, TAGS AND OTHER SIMILAR TECHNOLOGIES

Our website (www.canadagoose.com) uses automatic data collection technology and services such as "cookies", "web beacons", "tags" and other similar technologies. A cookie is a small data file that is placed on the hard drive of your computer so that your computer will "remember" information when you visit a website. Web beacons and tags are small strings of code that are used in conjunction with a cookie and that allow us to record activity on our website. A web beacon allows us to capture certain additional types of information about a visitor's actions on a website, such as a visitor's cookie number, the time, date,

duration and number of page views, a description of the page where the web beacon is placed, and details about any items that were purchased.

When you use our website, these technologies may record and collect personal information, such as information that identifies your computer, tracks your use of our website and collects certain information about you and your surfing habits. This information may include information that identifies your device, IP address, browser type and language preferences, and information about referring and exit pages and URLs, keywords, date and time, what sections of a website you visit, and other similar information concerning your use. This information is used for the purposes mentioned above and to help us serve you better by improving our website design, as well as our products, services, and promotions. We also use the technologies mentioned above to improve functionality of our website and user experience.

Type of Cookie	Data Collected	Purpose of Cookie	Duration of Storage
Functional Cookie	dwsecuretoken_xxxxx	Request id to avoid any high jacking of a secure session	Session
Functional Cookie	dwanonymous_ xxxxx	Stores the anonymous user id to retrieve the basket if a customer comes back later	6 months
Functional Cookie	dwsid	Stores customer session ID.	Session
Functional Cookie	dwcustomer_xxxxx	Stores the id of a customer registered once and requested "to be remembered"	6 months
Demandware	Données_pays	Stores customer geolocation to provide geo-redict capability	Permanent
Bazaarvoice	BVImplMain Site	Bazaarvoice Trackers to enable anonymous analytics & measurement reporting. Track successful order completion and send customers an invitation to submit an online review	Permanent

## **FUNCTIONAL COOKIES**

## **ANALYTICS COOKIES**

Type of Cookie	Data Collected	Purpose of Cookie	Duration of Storage
Google Analytics	_ga	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguishes unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports. By default it is set to expire after 2 years, although this is customisable by website owners.	Permanent
Demandware	dwpersonalization_xxxxx	Participation in an AB test lasting longer than a session	31 days
Fullstory	fs_uid	Track user behaviour/clicks on the website platform to better optimize user experience and inform site design.	Session
Freshmarket	_session_id	Track user behaviour/clicks across site forms to better optimize user experience and form design.	Session

# TRACKING COOKIES

Type of Co	okie	Data Collected	Purpose of Cookie	Duration of Storage
Bazaarvo	vice	BVImplMain Site	Stores customer ID to facilitate reviewing and posting Bazaar Voice product reviews.	Permanent
Brandify		W2GISM	Store customer country and location preference for the store localtor on the website	Session
Size analysis		fita.sid.canadagoose	Stores the customer preference of the fit data entered from previous activities so that the site can provide quick fit / size recommendations.	Session

As noted, this Privacy Policy applies to all personal information collected and processed by us using cookies, web beacons and tags on our website.

When accessing our website, you are requested to consent to the use of cookies and similar techniques in accordance with our Privacy Policy. Should you change your mind at a later stage, you can easily change your "cookie settings" by changing the settings of your web browser (e.g. Internet Explorer, Google Chrome, Safari, etc.). For more information hereon, please refer to the 'help' section of your web browser and see below. If you do not consent to the use of cookies and similar techniques when accessing our website and/or when you turn off the use of cookies and similar techniques via your web browser settings later, you may still visit our website, but you may not be able to use some areas of the website and the website may not provide optimal functionality.

If you wish to block certain cookies, you can do so in the browser you are using by following the applicable link below:

Internet Explorer: http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies

Chrome: https://support.google.com/accounts/answer/61416?hl=en

Firefox: https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences

Safari: http://support.apple.com/kb/PH5042

Our website uses the web analytics service Google Analytics that is provided by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses "cookies". The information generated by the cookie on your use of the platform will be transmitted to and stored by Google on servers in the United States. We have activated the so called "IP-anonymization" which means that your IP address will be truncated within the area of the European Union or the European Economic Area before being transferred to the United States. Only in exceptional cases the entire (ie. non-truncated) IP address will be transferred to a Google server in the US and truncated there. Google will use this information on our behalf for the purpose of evaluating your use of the platform, compiling reports on platform activity and providing other services relating to platform and internet usage. Google does not provide us with data that we may link back particularly to you. Your truncated IP address that is transferred to Google will not be associated with any other data held by Google. You may refuse accepting cookies by selecting the relevant settings of your browser. However, please note that if you do so you may not be able to use the full functionality of the platform. To opt out of being tracked by Google Analytics across all websites, you can visit http://tools.google.com/dlpage/gaoptout. Personal information obtained through cookies, web beacons and tags may be shared with or obtained by third party service providers on our behalf in accordance with applicable laws (cf. the section immediately below). In that case, the processing of this personal information may also be subject to the privacy policies of these third-parties. We therefore highly recommend that you take due account of these privacy policies when using our website.

### THIRD-PARTY ADVERTISING PARTNERS

We use third-party service providers to serve advertisements on our behalf across the internet. These advertising service providers may collect non-identifiable information about your visits to our website, and your interactions with our products and services. Such non-identifiable information does not include your name, address, email address or other personal information. Such providers may place and access their own cookies, tags, web beacons or similar technologies on your computer or device used to access the website to serve you ads or other content personalized to your interests. In addition to the information about your visits to our website, our service providers may also use the information about your visits to other websites to target advertisements for products and services available from Canada Goose.

As described above, you may reject the use of cookies when accessing our website and you may be able to set your browser to reject cookies later. In that case, you may still receive online advertising, but it may be less personalized.

## **"DO NOT TRACK" SIGNALS**

Unless your browser settings are configured to make your online activities and publicly available information about your online activities (such as traffic data) invisible to usage analytics tools, we do not presently have the capability to omit you from usage analytics to the extent your browser only sends us a "do not track" signals or message and does not otherwise screen you from tracking without any action on our part.

Third parties, other than our vendors (such as our website analytics provider), do not have authorization from us to track which websites you visited prior and after visiting our website. That said, we cannot control third party tracking and there may be some third party tracking over time and across third-party websites that occurs without our knowledge or consent.

If you do not wish your online activities (on our website) to be tracked, we highly recommend to change your web browser settings. For more information hereon, please refer to the 'help' section of your web browser.

#### THIRD PARTY LINKS

Our website may contain links to other websites which are not under the control of Canada Goose. We are not responsible for the privacy practices or content of such other websites. We encourage our users to be aware when they leave our website and to read the privacy statements of each website to which we may link that may collect personal information.

#### **SECURITY**

We maintain technical, physical and administrative security safeguards to protect personal information against loss and any form of unlawful processing (such as theft and unauthorized access). Any personal information you provide to us is exchanged on a secure server. Furthermore, our website is secured by SSL-encryption to protect data from unauthorized access when transferring them over the Internet.

## **YOUR RIGHTS**

You may have certain rights in relation to your information including a right to access or to correct the information we hold on you. Some of these rights will only apply in certain circumstances however, such as the right to be forgotten or the right to request that we move your information to another company. They will generally not be available if there are outstanding contracts between us, if we are required by law to keep the information or if the information is relevant to a legal dispute. If you would like to exercise, or discuss, any of these rights, please contact our privacy officer at Privacyofficer@CanadaGoose.com.

- **Right to withdraw consent:** You can remove consent, where you have provided it, at any time, as well as update any of your opt-in marketing preferences by contacting us.
- **Right of access:** You are entitled to obtain from us details concerning the processing of your personal information and to receive a copy of the personal information we process about you (including in electronic form). Additional copies may be subject to a reasonable administrative fee.
- **Right to rectification:** You are entitled to have any incomplete and inaccurate personal information held by us rectified. If you have an account with our online store, you can log in and update your account information, including contact, billing and shipping information.
- **Right to erasure ('to be forgotten'):** In certain circumstances you are entitled to have personal information erased. If you request that we erase your personal information we shall advise you if we consider that there are on-going grounds permitting us to continue processing your information.
- **Right to restrict processing:** You can ask us to restrict the processing of personal information we hold about you in certain circumstances. We will advise you if we do not agree with your request to restrict processing and our reasons.
- **Right to data portability:** In certain circumstances you can ask us to help you move your information to other companies.

- **Right to object:** You are entitled to object to our collection, use of and otherwise processing of your personal information where the basis for the processing is our legitimate interests or the processing is in the public interest. You may object to processing for direct marketing purposes at any time.
- **Right to complain:** In the event that you have any questions, concerns or complaints regarding this Privacy Policy or the manner in which we collect, use and otherwise process your personal information we shall always seek to address the same promptly and to your satisfaction. However if you consider that we have not done so you are entitled to lodge a complaint with the relevant supervisory authority in your jurisdiction.

## UNSOLICITED COMMUNICATIONS

Canada Goose complies with applicable laws regarding unsolicited marketing messages (e.g. 'spam') and will not send you such messages in contravention of such laws. Our online store allows you to sign up and expressly consent to receiving electronic communications. We will ensure that each email includes an opt-out feature and instructions on how to un-subscribe if you no longer wish to receive future e-mails from us. You may also contact us at <u>cglu@canadagoose.com</u> to stop receiving them or can unsubscribe using the link included in the e-mail or by telephoning us at 800 22 385. If you have not expressly opted-in to receiving electronic marketing communications, we will only communicate with you if we are otherwise entitled to do so by applicable law.

## CHILDREN'S PRIVACY

Our website is not intended for use by children under the age of 13, and we do not knowingly collect personal information from such children through our website. If you are under 13, please do not give us any personal information. If we learn that we have collected the personal information of such a child we will take steps to delete the information as soon as possible.

## CHANGES TO THIS PRIVACY POLICY

Canada Goose reserves the right, in its sole discretion, to change, modify, add or remove portions of this Privacy Policy at any time and from time to time. If we change anything important about this policy (the information we collect, how we use it or why), we will highlight those changes at the top of the policy and provide a prominent link to it for a reasonable length of time following the change. If you would like to access previous versions of this policy, please contact us using the details below.

## HOW TO CONTACT US - CANADA GOOSE PRIVACY OFFICER

We welcome your feedback. If you have any questions about this policy please contact Canada Goose's Chief Privacy Officer at: Privacyofficer@CanadaGoose.com.

In addition, Canada Goose International AG can be contacted at 800 22 385 or by mail at Canada Goose International AG Baarerstrasse 133 CH - 6300 Zug.

Canada Goose Inc can be contacted at 1-888-668-0625 and by mail at Canada Goose Inc. PO Box 61070 Eglinton & Dufferin RO, Toronto, Ontario, M6E 5B2, Canada