

## PRIVACY POLICY

The Alberta Recycling Management Authority (“ARMA”) respects your privacy. This Privacy Policy describes the manner in which we collect, use and disclose your Personal Information (defined below), whether that information is collected through our Websites at [albertarecycling.ca](http://albertarecycling.ca) or on ARMA Connect (“Websites”) or directly or indirectly in any other manner. You should read this Privacy Policy before using our Websites and if you disagree with this Privacy Policy you should refrain from using our Websites. By using our Websites, you consent to the collection, use and disclosure of your Personal Information in accordance with this Privacy Policy.

Changes may be made to this Privacy Policy from time to time. We encourage you to frequently check our Websites for any changes to stay informed about how we are helping to protect the Personal Information we collect. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications. If you do not agree to any changes to this Privacy Policy, you should again refrain from using our Websites. Your continued use of the Websites following the posting of changes will be deemed to be your acceptance of those changes.

If the provisions any federal, provincial, state or local laws establish higher or other standards for the protection of Personal Information, those laws will take precedence.

We recognize the importance of safeguarding the confidentiality of Personal Information from loss, misuse, or alteration. Accordingly, we employ commercially reasonable administrative, technical, and physical safeguards to protect Personal Information from unauthorized access, disclosure, and use. Even with these safeguards, no data transmission over the Internet or other network can be guaranteed 100% secure. As a result, while we strive to protect information transmitted on or through our Websites, your transmission is at your own risk.

### 1. Personal Information that we collect

ARMA collects information that personally identifies or relates to you (“Personal Information”) which may include the following:

- (a) Personal identification and contact information: name, address, phone numbers, fax numbers, email address, company name and other information relating to your identity that you choose to submit to us;
- (b) Commercial and employment information: we may request information regarding your employer, occupation, the business that you represent and sales, supply chain relationships and financial information related to the designated material;
- (c) Internet information: when you use our Websites, we may collect information about your device and website usage, such as browsing and search data, your Internet Protocol (IP) addresses and other data through the use of cookies, web beacons, or similar technologies (see our Cookie Policy below);
- (d) Geographical location information: information relating to your geographical location or location for proposed services;
- (e) Audio or visual information: information including call recordings, messages and other electronic communications, pictures or videos you upload or send to us, and testimonials; and,
- (f) Other information that you voluntarily submit using the Websites.

The Personal Information we collect will vary depending on how you use the Websites and our relationship with you. We may require this information to properly serve you or to improve our service to you.

We also automatically collect aggregate and other information in connection with the use of our Websites. This information may include the type of web browser you use, the type of device you use, your operating system and version, the pages you view, the frequency and duration of visits, the date and time of visits, and other such information. If the data we automatically collect is capable of being associated with you, directly or indirectly, we treat it as Personal Information. If this information is not capable of being individually associated with you, we treat it as data on usage of our Websites.

## **2. Cookie Policy**

We use cookies and other automated tools such as tracking pixels and web beacons to collect certain information and to improve the use of our Websites. A cookie is a small text file placed on your computer to identify your computer and browser. These tools, for example, may assist us in such matters as saving your preferences to provide you with a personalized version of the Websites. You can reset your web browser to refuse or manage cookies, though certain features of our Websites may not work if you delete or disable cookies.

ARMA may use the following types of cookies:

- (a) Session Cookies, which track your information as you move within the Websites and which are typically deleted once you close your browser. These cookies help us deliver a personalized experience when you review our services online;
- (b) Persistent Cookies, which reside on your computer and allow us to personalize your experience from visit to visit of our Websites. These cookies may allow us to remember your preferences;
- (c) Analytics Cookies, which help us analyze how our Websites is working and who is using our Websites; and
- (d) Advertising Cookies, which are used to learn about you and advertise products or services that might interest you.

We also use web beacon technology that enables us to track certain characteristics of a user's visit to the Websites. This helps us to manage our Websites by providing us with information as to the effectiveness of content, and how visitors arrive, depart and engage with the Websites. The technology usually involves either (1) "tracking pixels" (executable code embedded in a web page to track usage activity including pages viewed, and when and how long they are viewed), and (2) "clear gifs." (tiny graphics with unique identifiers embedded in web pages or email messages that track whether or not a user has viewed a particular web page or email message). This user activity information may be associated with additional information about a user's website session and Personal Information (if provided by the user).

Emails that you receive from us may include web beacons that enable us to recognize when you opened an email or clicked on certain links; this information is used to evaluate and improve our communications to users.

## **3. Social Media, Links and Third Parties**

Our Websites includes social media features, which may collect information about your IP address and the pages you visit on our Websites as well as other Personal Information. A cookie may be set to ensure that such features properly function. Any interactions with such features are governed by the privacy policies of the companies that provide them.

The Websites may contain links to third party websites (including social media platforms as noted above). Please be aware that if you access these links, you will be leaving our Websites. We encourage users to

read the privacy policies of those sites, as we are not responsible for their content, links, or privacy procedures.

Also, certain third parties may collect Personal Information and/or information on usage from users of our Websites through automatic information collection tools such as cookies and tracking pixels. The collection, use, and disclosure of Personal Information and/or information on usage by these third parties is governed by their privacy policies.

#### **4. Use and Sharing of Your Personal Information**

##### **A. General Use**

The Personal Information we collect may be used by ARMA for the purposes for which it was collected, as provided in this Privacy Policy, or for other purposes that are disclosed to you and to which you consent.

For example, we may use your Personal Information to: respond to your inquiries; supply you with requested services; send you informational or promotional communications; to carry out other purposes that are disclosed to you and to which you consent; to carry out any other purpose permitted or required by law. We may transfer Personal Information to third party service providers that assist us with carrying out these purposes.

ARMA reserves the right to transfer Personal Information in the event that we merge with or are acquired by a third party. We also may disclose your Personal Information for any other purpose permitted by law or to which you consent.

##### **B. Use by Service Providers**

We may provide your Personal Information to third parties who require it to provide services to us or to you on our behalf such as IT and system administration, hosting, data analysis, providing information technology infrastructure and software platforms, email delivery, auditing, and other similar services.

We require that service providers use Personal Information that we provide to them only as specified by us, and they are expected to use reasonable security measures to protect your Personal Information.

#### **5. Compliance with Laws and Law Enforcement**

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose Personal Information and any other information about you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate (i) to respond to legal requests (including court orders, investigative demands, and subpoenas), (ii) to protect the safety, property, or rights of ourselves, consumers, or any other third party, (iii) to prevent or stop any illegal, unethical, or legally actionable activity, (iv) or to comply with law.

#### **6. How Long will ARMA Retain my Personal Information?**

ARMA will only retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected unless we are required to retain the Personal Information in order to meet our legal and regulatory requirements. In all cases, after the expiry of applicable retention periods, information that is no longer required will be securely deleted.

#### **7. Updating Your Information**

You are able to add to or update information on certain website pages as shown on those pages. When you update information, however, we often maintain a copy of the unrevised information in our records. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

## **8. Questions or Concerns**

If you have any questions or concerns regarding privacy on our Websites or would otherwise like to exercise any of your rights in respect of your personal information, please contact us at [privacy@albertarecycling.ca](mailto:privacy@albertarecycling.ca).