



PRIVACY POLICY

Effective Date: June 4, 2021

This Privacy Policy for The Spoke Club Inc. o/a Clio Toronto (referred to in this Privacy Policy as “**Clio**”, “**we**” or “**us**”) describes how Clio collects and uses information from people who visit our website located at www.cliotoronto.com (the “**Site**”). We understand and greatly value the importance of your privacy. We will only use your personal information in accordance with the Privacy Policy, unless otherwise required by applicable law.

Please read this Privacy Policy carefully to understand our policies and practices for collecting and using your information. **If you do not agree with our policies and practices, do not use the Site.** We may make changes to this Privacy Policy at any time by posting a notice at the top of this page that the Privacy Policy has been updated. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Site home page.

TYPES OF INFORMATION WE COLLECT.

We collect and use several types of information about you including:

- **Personal Information** which is information that can reasonably be used to directly or indirectly identify, locate or contact you, such as your name, mailing address, email address and photo I.D. It also includes information that may be associated with personal information, such as your gender identity, physical disabilities, religious affiliations, ethnicity and sexual orientation.
- **Non-Personal Information** which is information that does not directly or indirectly identify you or any other individual, such as demographic information, statistical or aggregated information, technical information and information about your interactions on our website.

HOW WE COLLECT YOUR INFORMATION.

We use different methods to collect your information, including through:

- **Direct interactions with you**, for example, when you create a user account, fill out our membership application form, provide your credit card information to pay your initiation and membership fees, or when corresponding with us by phone, email or otherwise.
- **Automated technologies or interactions**, as you navigate through our Site. Information collected automatically may include usage details, IP addresses and information collected through cookies

WHAT INFORMATION WE COLLECT.

A. Information You Provide Us.

In order to access various parts of our Site or apply for a Clio membership we ask you to provide the following information:

- **When you create a user account**, we ask you to provide an email address and password.
- **When you apply for a Clio membership**, we require you to provide us with a recent headshot, a copy of your driver's licence or government issued ID, your name, address, phone number, date of birth, employer, business address, job title and a link to your LinkedIn profile .

We also request, but do not require, that you provide us with links to your social media pages, any related profile pictures, your gender identity, preferred pronouns, sexual orientation, relationship/marital status, ethnic or cultural origins of your ancestors, any disabilities or impairments, primary language, and religion, spiritual practice, or existential worldview.

- **When signing up for a Clio membership** we require you to provide us with credit card and banking information.

We may also collect information directly from you when you when you communicate with us, whether via phone, email, mobile application, social media platform or other method of communication. Such information may include without limitation records and copies of such correspondence and your contact information.

B. Information That is Collected Automatically.

When you visit our Site we collect some information automatically through cookies [and other automatic data collection technologies]. We do not use this information to personally identify you. The information we collect automatically helps us to analyze and optimize the performance of our site and to deliver a better and more personalized service. Information we collect automatically includes the following:

- Details of your visits to our Site, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Site.
- Information about your computer or device type and internet connection, including your IP address, operating system, and browser type.

We automatically collect non-personal information in the following ways:

- **Log Files:** When users visit our Site we gather certain information and store it in log files. This information may include IP addresses, system configuration information, URLs of referring pages, and local language preferences. We use this information to support the internal operations of our Site. We do not use this information to identify or create a profile about our users.
- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. Cookies are used to make the Site function and to improve its efficiency, as well as to provide us with Site usage information. You may disable cookies by activating the appropriate setting on your browser. However, disabling cookies may cause certain parts of the Site not to function properly.
- **Google Analytics.** We Google Analytics to assist us in collecting and understanding how our Site is used by visitors. We use information we collect through Google Analytics to improve the Site

and the services we provide to your users. Information about Google Analytics' security safeguards can be found here: [Google Analytics: Safeguarding Your Data.](#)

To learn more about automatic data collection practices and your ability to opt-out of having your data tracked automatically please visit the [Digital Advertising Alliance of Canada Opt-Out Tool.](#)

C. Information from Service Providers

We may also receive information about you from our service providers and business partners, including companies that assist us with payment processing, booking and managing reservations, data processing and management, account management, hosting, customer and technical support, and other services which we use to provide services to you.

HOW WE USE YOUR INFORMATION.

We use the information we collect for the following purposes:

- To process membership applications and determine whom to accept as Clio Members.
- To provide a safe and inclusive environment to our members.
- To process the payment of your initiation fee, your membership fees and any other charges incurred by you through your Clio membership.
- To respond to your enquiries.
- To contact you regarding prospective members who have listed you as a referral source.
- To provide you with information regarding the Clio club and its services, including special events or announcements.
- To provide top quality service and experiences aligned with the tastes and interests of our Members.
- To inform and enhance our marketing strategy and internal business practices.
- To present our Site and its contents to you and to optimize its performance.
- To fulfill the purposes for which you provided the information or that were described to you when it was collected.
- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.

LINKS TO THIRD-PARTY SITES

This Site may include links to third-party websites, plug-ins, services, social networks and applications. Clicking on those links or enabling those connection may allow the third-party to collect or share data about you. If you follow a link to a third-party website or engage in a third-party plug-in, please note that these third-parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

WHEN WE MAY SHARE YOUR INFORMATION WITH OTHERS.

- A. **Third Party Service Providers.** We may share your personal information with third-party service providers we use to support our business. For example, we use third-party service providers to help us make the Site operate smoothly, to help us communicate with our users, to help us to process and fulfill online payments and to improve our users' experience. Our third-party service providers are contractually obligated to keep personal information confidential and to use it only for the purposes for which we disclose it to them.
- B. **Legal and Safety Factors.** We may disclose personal information if required by law or in the event we need to share information with a third party in order to protect a person's safety and security or the safety and security of Clio or its employees.
- C. **Business Partners and Affiliates.** We may disclose your personal information to our business partners and affiliates with whom we have contracted to provide you with products or services that may be of interest to you. For example, your personal information may be shared with business partners with whom we jointly offer products and services. We require our business partners and affiliates to agree in writing to maintain the confidentiality and security of the personal information they obtain on our behalf.
- D. **Corporate Change.** We may disclose personal information to third parties in connection with a corporate change, including any due diligence process, but such disclosure will be subject to this Privacy Policy continuing to govern treatment of personal information.
- E. **Affiliate Companies.** We may disclose personal information to our subsidiary and affiliate companies, but such disclosure will be subject to this Privacy Policy continuing to govern treatment of personal information.
- F. **Consent.** We may disclose your personal information where you have provided us with your consent to do so.
- G. **Non-Personal Information.** We may disclose aggregated information about our users, and information that cannot be used to identify any individual without restriction.

LEGAL BASIS FOR PROCESSING USER INFORMATION.

We will only process user information where we have a legal basis to do so. The legal basis will depend on the purposes for which we have collected and use the information. In almost every case the legal basis will be one of the following:

- consent: for example, where the user has provided consent to be contacted by us
- our legitimate business interests: to better services our members and visitors to our Site, improve user experience, and keep users safe; or
- if required by law: where we are subject to a legal obligation and need to use personal information in order to comply with that obligation.

TRANSFERRING YOUR PERSONAL INFORMATION.

Clio has users in multiple countries including the European Union and the United States. We or our service providers may process, store and transfer your personal information in and to a foreign country, including the United States, with different privacy laws that may or may not be as comprehensive as Canadian law. International transfers will be protected by appropriate safeguards in accordance with this Privacy Policy and the requirement of applicable privacy laws.

If you are visiting from the European Union or other regions with different laws governing data collection and use, please note that you are agreeing to the transfer of your personal information by Clio from your region to countries which do not have data protection laws that provide the same level of protection that exists in countries in the European Economic Area, including Canada and the United States. By providing your personal information, you consent to any transfer and processing in accordance with this Privacy Policy.

SECURITY

The security of your personal information is very important to us. We take appropriate technical and organisational measures to safeguard the personal information that we hold and regularly review our security measures to consider new technologies and methods to safeguard that information. Please note that no transmission over the internet can ever be guaranteed secure and, as a result, we cannot guarantee the security of any personal information that we receive over the internet.

The safety and security of your personal information also depends on you. Where we have given you (or you have chosen) a password to access certain parts of our Site you are responsible for keeping that password confidential.

YOUR RIGHTS

Subject to certain legal exemptions, you have the following rights with respect to the personal information we hold about you:

- **The right to access.** Where we have collected personal information about you, you have the right to access that information.
- **The right to rectification.** You have the right to have us correct inaccurate personal information we hold about you.
- **The right to erasure.** You have the right to have your personal information erased.
- **The right to object to or restrict collection.** You have the right to object to or restrict us from collecting your personal information.
- **The right to data portability.** You have the right to receive your personal information from us in a structured, commonly used, and machine-readable format.
- **The right to complain to a supervisory authority.** You have the right to file a complaint with a supervisory authority responsible for the collection of personal information if you feel we have infringed your privacy rights.
- **The right to withdraw consent.** Where you have provided us with consent, you have the right to withdraw that consent at any time.

We will handle any request to exercise these rights in accordance with applicable law and any relevant legal exemptions. You may exercise these rights as permitted by the Site or by contacting us using the contact details below.

DATA RETENTION

Except as otherwise permitted or required by applicable law, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, included for the purposes of satisfying any legal, accounting, or reporting requirements. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies.

Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

CHILDREN UNDER THE AGE OF 13.

Our Site is not intended for children under 13 years of age. No one under age 13 may provide any personal information to the Site. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Site. If we learn we have collected or received personal information from a child under 13 we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at the contact information below.

CHANGES TO OUR PRIVACY POLICY

We will post any changes we make to this Privacy Policy with a notice at the top of this page that the Privacy Policy has been updated. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Site home page.

CONTACT US

We welcome your questions, comments, and requests regarding this Privacy Policy and our privacy practices. Please contact us at:

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