

BABY POINT CLUB

PRIVACY POLICY

Scope and Overview

Baby Point Club is committed to protecting the accuracy, privacy and security of your personal information. This Privacy Policy describes how Baby Point Club and its subsidiaries, affiliates and related entities (collectively, "Baby Point Club," "we" or "us" or "the Club") collect and use personal information.

This Privacy Policy describes the categories of personal information that we collect, how we use your personal information, how we secure your personal information, and when we may disclose your personal information to third parties. This Privacy Policy also describes your rights regarding the personal information that we hold about you and how you can access, correct, and request erasure of your personal information.

We will only use your personal information in accordance with this Privacy Policy unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

Consent

By submitting your personal information to us, you signify your consent to the collection, use and disclosure of your personal information in accordance with this Policy and as permitted or required by law.

If you provide the Club or our service providers and agents with personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

Collection of Personal Information

In this Privacy Policy, personal information means any information about an identifiable individual, as may be defined or limited under applicable privacy legislation. Personal information excludes anonymous or de-identified data that is not associated with a particular individual. To carry out our activities and obligations, we may collect, store, and use the following categories of personal information, which we need to administer the contractor and/or membership relationship:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Emergency contact information.
- Bank account details.
- Other personal details included in a resume or cover letter.

Personal Information Use

We may use your personal information for the following legitimate business purposes:

- Business management and planning including internal administration with our affiliated entities.
- Administering accounts, collecting and processing payments and fulfilling contractual obligations.
- To understand and respond to member, supplier and other third-party needs and preferences.
- To develop, enhance, market, sell or otherwise provide Baby Point Club's services
- To distribute our event invitations, updates and other communications to individuals on our mail and e-mail lists, either directly or through third-party distribution service providers.
- To contact and communicate with members and other individuals for the purpose of evaluating member satisfaction.
- To consider whether we should establish a commercial relationship with suppliers and other third parties, including to evaluate credit standing.
- Processing insurance claims.
- Complying with health and safety obligations.
- Complying with applicable law.
- For any other purpose to which you consent

We will only use your personal information for the purposes we collected it for. If we need to use your personal information for an unrelated purpose, we will notify you and, if required by law, seek your consent. We may use your personal information without your knowledge or consent where required by applicable law or regulation.

Data Sharing

We will only disclose your personal information to third parties where required by law or to our contractors, designated agents, or third-party service providers who require it to assist us with administering the membership relationship with you, including third-party service providers who provide services to us or on our behalf.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal information consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to use your personal information for their own purposes, or to communicate your personal information to third parties without consent, subject to limited exceptions. We only permit them to use your personal information for specified purposes in accordance with our instructions.

We may also disclose your personal information for the following additional purposes where permitted or required by applicable law:

- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal information to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal information necessary for the specific purpose and circumstances.
- During emergency situations or where necessary to protect the safety of persons.
- Where the personal information is publicly available.
- If a transfer or change in ownership occurs.
- For additional purposes with your consent where such consent is required by law.

Data Security

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal information against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit personal information access to those agents, contractors, and other third parties that have a legitimate business need for such access.

Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. 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. Once you are no longer a member of the Club we will retain and securely destroy your personal information in accordance with our document retention policy and applicable laws and regulations.

Rights of Access, Correction, Erasure, and Objection

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership. By law you have the right to request access to and to correct the personal information that we hold about you, or withdraw your consent to the use of your personal information under certain circumstances. Any such communication must be in writing.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Right to Withdraw Consent

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances.

Privacy on Our Website

When an individual accesses the Baby Point Club website, we may use a browser feature called a “cookie” to collect information such as the type of Internet browser and operating system the visitor uses, the domain name of the website from which the visitor came, date and duration of the visit, number of visits, average time spent on our website, pages viewed and number of cookies accumulated. A cookie is a small data file and unique identification number that identifies the visitor’s browser, but not necessarily the visitor, each time our website is visited. Unless a visitor specifically informs us, we will not know who the individual visitors are.

In addition to the identified purposes described in the Privacy Policy, we may use this aggregate website information and share it with other organizations with whom we have a commercial relationship to measure the use of our website, diagnose technical problems, to improve the functionality and content of the website and to facilitate usage by a visitor. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies.

Our website may contain links to other websites which are provided as a convenience only. Visitors are advised that other third-party linked websites may have different privacy policies and practices than Baby Point Club and may also collect your data and personal information. The Club is not responsible for the content, security, accuracy or privacy practices of the third-party websites, nor any external links contained in the third-party websites.

Data Privacy Officer

We have appointed the Vice President of the Board of Directors to oversee compliance with this Privacy Policy. If you have any questions about this Privacy Policy or how we handle your personal information, or would like to request access to your personal information, please contact the Vice-President of the Board.

Changes to This Privacy Policy

We reserve the right to update this Privacy Policy at any time, and we will provide you with a new Privacy Policy when we make any updates. If we would like to use your previously collected personal information for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal information for a new or unrelated purpose. We may use your personal information without your knowledge or consent where required or permitted by applicable law or regulation.

Contact Us

If you want to review, verify, correct, or withdraw consent to the use of your personal information, please contact the President of the Board of Directors at (email address).

Effective Date: **May XX**, 2021

