

FIRST PEOPLES RADIO WEBSITE PRIVACY POLICY

This First Peoples Radio Website Privacy Policy (this "**Privacy Policy**") governs your access to and use of the websites, services and applications (collectively, the "**Site**") which are owned, operated or provided through third party websites, by First Peoples Radio Inc. and its applicable subsidiary companies ("**First Peoples Radio**").

IT IS IMPORTANT THAT YOU READ ALL OF THESE TERMS AND CONDITIONS CAREFULLY.

In this Privacy Policy, "**we**" means (and "**us**", "**our**", and "**ours**" refer to) First Peoples Radio. "**You**" means (and "**your**" refers to) the user of the Site.

"**Personal Information**" is defined in this Privacy Policy as information that could reasonably personally identify you as an individual. Examples would include your name, mailing and email addresses, age, birthday, telephone number, picture and voice recording. This Privacy Policy describes the types of Personal Information that we collect, how we collect it, why we collect it and what we use it for.

"**Non-identifiable Information**" is information that by itself cannot be associated with you as an identifiable individual, such as browser type, information about your operating system, device, and the unique identifier assigned to your device.

We Respect Your Privacy

We highly value your privacy and make this Privacy Policy easily available throughout our Site to assist you in understanding the handling of information in the course of using the Site.

Acceptance of Terms

By accessing and continuing to use the Site, and by providing certain Personal Information to First Peoples Radio through the Site, you are indicating your acceptance to be bound by the terms and conditions of this Privacy Policy. If you do not accept these terms and conditions, please do not access or use the Site, or provide Personal Information through the Site.

Modifications and Notices

We may revise this Privacy Policy, at any time, by updating this posting. We may provide notice to you of material revisions by means of a general notice on the Site. Your continued use of the Site after such revisions are posted, will signify your agreement to these revised terms. Therefore, you should visit this page periodically to review this Privacy Policy.

General Information about Browsing Data, Cookies and Behavioural Advertising

"**Browsing Data**" is information that First Peoples Radio and its third party partners may collect about your web browsing and app usage, such as the date and time you visited

certain websites or apps, pages of such websites or apps that you visited, the names or types of mobile app that you visited, and other data such as page visits, ads shown, ads clicked and conversions.

It is our policy not to associate Non-identifiable Information or Browsing Data with customers, even though we verify some kinds of technical information to ensure that the Site is optimized to serve users of the Site.

First Peoples Radio may collect Non-identifiable Information through the use of cookies, web beacons, or similar files (collectively “cookies”). We use this information to assess general usage patterns, including identifying repeat users, collect demographic information, administer and make improvements to the Site to tailor our visitors’ experiences and display content according to their preferences so as to make it more useful to you and other users. First Peoples Radio and such other third parties as we may designate reserve the right to use, maintain, update and/or disclose Non-identifiable Information to third parties.

First Peoples Radio may, from time to time, provide Browsing Data (such as the number of times you have viewed an ad, to serve additional ads about goods and services that may be of interest to you) to third party advertising companies. Using the Browsing Data collected, First Peoples Radio and third parties can infer such things as browser type, operating system, browser language, internet protocol address, internet service provider, and mobile advertising identifier for mobile devices.

Additionally, cookies may be used to provide easier and faster access to website features such as logins and/or repeat visits. Cookies are very small text files that are stored on personal computers for reference purposes. We do not link the information we store in cookies to any Personal Information you have submitted while on our Site.

We use both session ID cookies and persistent cookies. A session cookie expires when your browser is closed, and a persistent cookie may stay on your hard drive for an extended period. Session cookies make it easier for you to navigate our Site; persistent cookies can perform such activities as storing your password for forums or blogs so you do not have to sign in every time you visit those areas, and/or may be used to enable us to track and target the interests of our users so as to enhance the overall experience of using our Site. Most browser software allows you to delete cookies. You should consult your browser instructions or help screen for information on how to delete cookies. This may interfere with our ability to personalize your experience at the Site and be recognized, or may slow down performance.

For more information on online behavioural advertising or to opt-out from other third-party advertising companies, visit the Digital Advertising Alliance of Canada website at [Your Ad Choices](#).

Collection and Use of Personal Information

Some of the Personal Information we collect, is collected directly from you. While registration is not required in order to use or access the Site, if you do choose to register

with the Site, and in the process provide us with Personal Information, rest assured that any such information you provide will not be shared with any third-party organization except as described in this Privacy Policy.

We may collect Personal Information when you enter a contest or other promotional activities through the Site, when you participate in interactive online activities and/or when you contact us to make requests or comment on our services. You may be required to register for these features, particularly if you wish to enter a contest or promotional activity or leave comments or provide articles.

As discussed above, we may passively and automatically collect information from you, such as your Browsing Data.

We also provide visitors to the Site the opportunity to opt-in to receive communications from us. In this case, we may ask the visitor for his or her email address, first name and last name, or username, address, city, province, phone number, postal code and birth date. These communications will include our regular newsletter, product promotions and any other information that we feel may be pertinent to the visitor. You may opt out of receiving any, or all, of these communications by emailing us at infotoronto@elmntfm.ca, by replying to any email we send you and entering the word UNSUBSCRIBE in the subject line, or by visiting the Site and logging into your account and choosing unsubscribe.

While we usually collect your Personal Information directly from you, in some cases you may be asked to provide information to a third party, such as when you submit information to companies whose services are made available through the Site.

If you do not want to provide your Personal Information to us, then you should not use the Site or contact us, via the Site.

We collect Personal Information for the following purposes:

- to communicate with viewers and users of the Site;
- to advertise, develop, enhance and provide services and products to viewers and users of the Site, and to measure and improve the effectiveness of our services, products and marketing endeavours;
- to detect and protect us, you and others from error, fraud or other illegal activities;
- to manage and develop our business operations, including to manage proposed or actual sales or leases of all or part of our business or assets;
- to respond to your requests for services and your questions;
- to evaluate applications for, and to decide whether to establish (and to manage or terminate) an employment, contractual or partnership relationship;
- to manage our business, such as for billing and debt collection purposes; and
- to carry out any other purpose that you have authorized or that is required or permitted by law, and as applicable, for such other purposes as may be identified in our Privacy Policy.

We reserve the right to disclose your Personal Information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order or legal process served on the Site.

Further reference in this Privacy Policy to "Identified Purposes" means the reasons set out in this section.

What about Children?

Children under the age of 15 are not permitted to use the Site. Parents and legal guardians are responsible for ensuring their children who are younger than that age do not use the Site.

Disclosure of Personal Information

We do not disclose Personal Information to third parties for any other purposes other than those for which it was collected, except with your consent or as required or permitted by law.

There are a variety of circumstances where we may be required or permitted to disclose Personal Information to third parties. For example, we may disclose or transfer Personal Information to a third party engaged by us to perform functions on our behalf or to a public authority or agent of a public authority if, in our reasonable judgment, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information.

In situations where we disclose Personal Information in accordance with this Privacy Policy to third parties, we do not disclose more information than is required and, where it is reasonable and practical to do so, enter privacy agreements with third parties with whom we disclose Personal Information.

Third-Party Advertising

First Peoples Radio may from time to time engage advertising agents to serve ads from third parties when you visit the Sites. These advertisers may use Browsing Data compiled by us or them about your visits to First Peoples Radio and other websites and your response to ads in order to provide advertisements on websites that they serve about goods and services that may be of interest to you. The names of these advertising agents may be made available on the Site and we encourage you to visit their websites to review their privacy practices, which may be different than ours.

Location & Security

We will only use Personal Information collected through the Site for the Identified Purposes. We may engage service providers to assist us with fulfilling these purposes, and, in some instances, these service providers may be located outside Canada. These service providers

may include, but are not limited to, third parties that help us store data that we use as part of the Site.

We only select service providers that protect Personal Information in a manner that is comparable to the protection we provide under our Privacy Policy and this Privacy Policy. However, Personal Information may be subject to, and accessed under, the laws of the countries in which our service providers operate. In all cases, Personal Information which is transferred to third parties is subject to the privacy policies and practices of those third parties.

If you have any questions about our service providers outside Canada, or if you would like to learn more about our practices in that regard, please contact the Privacy Officer at the contact information provided below.

First Peoples Radio follows accepted industry standards to protect any Personal Information you have provided to us, including by employing feasible physical, technological, electronic and organizational safeguards. Examples of safeguards include: limiting access to relevant information to authorized employees only, using passwords or personal identification numbers (PINs) to authorize access to your account, and use of firewalls and encryption technology for certain electronically stored information. However, please be aware that no method of electronic storage can ever be 100% secure. Therefore – as is the case with any organization – we are not in a position to guarantee the absolute security of your information.

You may submit any questions you may have about our security procedures by emailing us at infotoronto@elmntfm.ca.

Retention of Personal Information

We will keep your Personal Information obtained via the Site for only as long as is necessary for us to fulfil the Identified Purposes or as long as is required by law.

Links to Other Websites

Our Site may contain links to other websites that are not controlled in any way by us. Please be aware of this when you click on any such links; we are not responsible for the privacy practices and/or policies of any website other than our own. Consequently, we strongly suggest that you review the privacy policy of every website you visit, whether or not they are linked to by our own Site.

Access to Personal Information

You may withdraw your consent for us to manage your Personal Information obtained via the Site in a particular way, subject to legal or contractual restrictions and reasonable notice. However, this may limit our ability to provide you with certain services and/or products. You may contact us for more information regarding the implications of withdrawing consent.

Upon request, and subject to exceptions required or permitted by law, you may access and review the Personal Information about you obtained via the Site and make appropriate changes to it by contacting us. You will be required to put your request in writing and show us identification. The reason we ask for identification is to ensure that, among other things, we do not unintentionally release your Personal Information to a third party who is representing him/her as you. We will inform you in the event we are required to restrict access to some or all information you request, or if we no longer hold your Personal Information.

Language

You and First Peoples Radio have requested and agree that this Privacy Policy and all documents related to this Privacy Policy be drawn up in English. Les parties ont demandé que cette convention ainsi que tous les documents que s'y rattachent soient rédigés en anglais (version française). In the event of a conflict between the English and French version of these terms, the English version shall prevail.

Contact Details

If you have any questions or concerns regarding this Privacy Policy, or you wish to contact us by phone or mail, our contact information is as follows:

First Peoples Radio Inc.
339 Portage Avenue
Winnipeg MB R3B 2C3
Attention: Privacy Officer
Telephone:
Facsimile:
E-mail: