

PRIVACY POLICY

In order to meet the needs of our campers and have the ability to care for them we must collect personal information about them and their families and distribute some information to people who must care for your child, as staff or as a service provider. All of the information gathered is stored in our files which are secured in our locked offices and processed in a secure data base with appropriate access controls.

We do not sell or rent your family information to any company, organization or individual. Your contract allows us to distribute camper name and contact information only for mailing and communication purposes for other campers and staff. We do retain your information to enable us to communicate with you in the future, provide your camper with recognition for time spent at camp, provide you with information about our programs, do statistical analysis and inform you of new and exciting information that may be of interest to you.

Our Privacy Policy is here to help you understand the way we use the data that you share with us. It covers why we collect certain data, how we collect it and what exactly we collect. It also explains how and who we might share your data with and your rights regarding your data.

When we say “we”, “us”, “our” and “Camp Kodiak” we are referring to the seven-member administrative team who operate the camp.

When we say “you”, “your”, “participant” and “customer” we are referring to either someone who has signed up for Camp or is visiting our website.

Camp Kodiak does not sell its customer data or mailing lists and will not share your personal data with any third party companies.

The Information We Collect

When dealing with our website there are three types of information we collect.

Personal Data

This is data that you voluntarily provide to us and contains information that we need in order for you to be able to learn about our program, or that may be given to us when you request more information and/or contact us. It would also apply to staff who wish to learn more about the camp or apply. It could also refer to alumni who wish to receive

mailings and be in communication with us. It is also data about you and your children and family that is relevant to provide them a safe and healthy summer (i.e. being able to communicate during the summer and having emergency contacts in place).

Usage Data

This helps us improve our websites and experiences and is often tracked automatically in the background such as your browser type, operating system or device type.

Cookie Data

Cookies are small packets of data which are stored on your computer or mobile device. Cookies are used to make certain features work on our websites as well providing reporting data.

Personal Data

Personal Data is any piece of data that identifies or can be reasonably used to identify you as an individual. We collect Personal Data in a few different ways with the most common being:

- **When you fill out a staff or camper application;**
- **When you request more information about one of our programs;**
- **When you register your interest in one of our programs;**
- **When you contact us online;**
- **When you voluntarily join our mailing lists;**
- **When photos or videos are taken of your kids at camp.**

When registering for any of our programs, we will ask you for information such as your full name, email address, date of birth, address, postal code and country, emergency contact information, and profile photo. For employment applications, we will also ask you to voluntarily provide further information such as home address, work history and references, and a host of other information.

When requesting more information about a program, registering your interest or contacting us online, we may ask you for information such as your full name, email address and contact details.

Sensitive Personal Data

Information such as medical or criminal background, passport information and other personal details may be considered "Sensitive Personal Data".

We use information you provide to us relating to a medical condition, disability or special needs you may have for the purposes of evaluating what suitable support may be available to you or your child and may be required. This information is also shared with camp employees who are directly involved in the application process and/or the provision of our services to your children or to you as staff.

We use information relating to any criminal conviction you may have for the purposes of evaluating your admission to our program, or for evaluating whether to allow you to continue on a program, and to share this information with camp employees and third parties for such purposes.

We collect passport information and your camp placement data in order to comply with the work permit requirements set by Citizenship and Immigration Canada and facilitate you or your child entering the country to attend camp.

This data will only be shared with a camp employer if you or a child of yours attends camp.

Lawful Basis for Processing Personal Data under GDPR

- **When registering for a Camp Kodiak program, we will rely on a contract with staff and an application form for parents for their child as the lawful basis for processing your personal information. As a potential customer registering for a Camp Kodiak program, we will need to process your data in order to provide you with our program services.**
- **When signing up to marketing communications or providing us with feedback related to a Camp Kodiak program, we will rely on Consent as the lawful basis for processing. You will be asked explicitly to provide us with consent for marketing communication at the point of applying for a Camp Kodiak program.**

Lawful Basis for Processing – Criminal Data

Camp Kodiak has a lawful basis under Article 6 of GDPR (i.e., contract, legitimate interest) to process data about criminal convictions or offences; the company also has legal authority to do so under Article 10 of GDPR based on data subject consent. A comprehensive register of participant criminal convictions is not kept and any data

related to criminal convictions or offences is anonymized when service is complete.

Usage Data

When visiting the **Camp Kodiak** website, we collect usage data, which is done automatically in the background. This includes:

Device Information

Camp Kodiak collects information about the devices accessing our websites including: the type of device, device operating system, device settings, application IDs and unique device identifiers. The exact information we collect varies depending on device and system settings.

Log Data

When visiting our websites, our servers automatically record information in server logs. These logs may include information such as your Internet Protocol address, browser type and settings, referring and exit pages, landing pages, pages viewed, language preferences and date and time stamps.

Location Information

When visiting our websites, we will receive data that will help us approximate your location – this helps us deliver the correct language and website to you. We may use the IP address from your browser or device to determine approximate location.

Cookie Data

We use cookies on our websites. Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive. Like many sites, we use "cookies" to collect information, however the information is not personally identifiable. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use certain features our website.

How We Use Your Information

We use the information we collect in the following ways:

- To help you complete your application and aid you with your child's summer experience, or your own staff experience;
- To respond to your inquiries and provide customer support;
- Confirming and/or obtaining references on your behalf;
- For billing, account management and other administrative tasks;
- To send emails and other communications relating to service(s) for which you have signed up;
- To send marketing communications;
- To investigate security issues and prevent fraud.

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How We Disclose or Share Data

Camp Kodiak does not sell or rent personal data to unaffiliated third parties or companies for marketing purposes.

Service Providers

In order to provide our services to customers, we use third party providers for areas such as web hosting, email communication, payment gateways, and catering. We also use a third-party traffic measurement service to understand how people are using the website.

Safety, Legal and Law Enforcement

Camp Kodiak may share your personal data in order to comply with safety, legal and law enforcement purposes.

Age Limitations

Our programs are for children but parents/guardians provide the information about our campers. We do not communicate with campers directly without unless consent has been given by a parent/guardian.

Your Rights

You are entitled, at any time, to a copy of the information we hold about you and to correct any inaccuracies. Please make this request in writing via mail or email.

You have a right to ask, in writing, not to receive any direct marketing material from us, such emails or physical letters. You can amend your preferences in all of our email newsletters by clicking "unsubscribe." Once notified, we will take all the necessary steps to discontinue using your information for direct marketing.

Please write to:

**Camp Kodiak Inc.
4069 Pheasant Run
Mississauga, ON L5L 2C2
Canada**

or email:

ilana@campkodiak.com

Should you have any questions or concerns about our Privacy Policy we urge you to contact Ilana Stoch, our Director who is also our Data Protection Officer at our offices. We will assume that you understand that we can collect, use, disclose as necessary and store information as set out in our Privacy Policy above. If you do not accept our Privacy Policy and decline to allow us to use your personal information or that of your camper, we may not be able to provide the necessary care and services to keep your child safe in our setting and we will need to discuss the status of your application for your camper this summer.