

Privacy Policy – RTD Canada Inc.

RTD Canada Inc., Labatt Brewing Company Limited and Anheuser-Busch InBev (together, **we**) respect your privacy and want you to have the best possible experience when you interact with us online.

This privacy policy (the **Privacy Policy**) explains how we collect, use, disclose, process, transfer and protect information you may provide to us through your use of our app and/or website (the **app/website**).

Along with this Privacy Policy, our [Terms of Use](#) describe the terms and conditions governing your access to and use of our app/website. You should make sure that you read and understand the Privacy Policy and Terms of Use because they create a binding contract between you and us.

If you have questions or concerns about the Privacy Policy or our use of your information, please contact our [Privacy Officer](#).

CONSENT

YOUR USE OF THIS APP/WEBSITE SIGNIFIES YOUR CONSENT TO BE LEGALLY BOUND BY BOTH THE PRIVACY POLICY AND THE TERMS OF USE. IF YOU DO NOT AGREE TO THE TERMS OF THE PRIVACY POLICY OR TERMS OF USE, DO NOT USE THIS APP/WEBSITE OR PROVIDE ANY INFORMATION TO US.

By clicking “I have read and I agree to the Privacy Policy” in this app/website, you are providing your consent for us to collect, use, disclose, process and transfer information about you in the ways described in this Privacy Policy.

By clicking “I’d like to receive exclusive offers” in this app/website (or otherwise opting-in to be contacted by us) you are providing your consent to be contacted by us and our affiliated brands, divisions or companies, as well as third parties who may conduct consumer research or administer promotional programs for us from time to time.

Opt-In and Opt-Out

We ask you to agree to receive communications from us (including any of our affiliated brands, divisions or affiliated companies) at the time you provide your email address to us (**Opt-In**). If you provide your email address through a channel that does not have a way for you to affirmatively Opt-In, you agree that by providing your email address you are opting-in. You will be responsible for opting-out of receiving future communications by clicking on the link provided at the bottom of our email communications or by contacting us (each an **Opt-Out**).

Transfer out of Canada of your Personal Information

Your personal information may be transferred, used, processed or disclosed outside of Canada. By providing us with your information and continuing to use this app/website, you consent to the transfer of your information outside of Canada should such transfer be necessary for any use or disclosure described in this Privacy Policy.

Personal Information

In order to use certain functions of the app/website you may need to create an account. When you set up an account, you expressly consent to our collection and use of several types of personally identifiable information (**Personal Information**) both now and in the future.

You do not have to provide Personal Information to us to simply access or view our websites, other than to confirm you are legal drinking age. App use generally requires creating an account.

Personal Information includes (but is not limited to): name, email, birth date, location, social media content you allow the app/website to access, and any other information we collect directly or indirectly from or about you through this app/website or otherwise with your consent (including from public sources with permission or licensed from third party sources).

We may collect, use or disclose Personal Information without consent in special situations where consent may not be appropriate or when we are permitted or required by law to collect, use or disclose the Personal Information without consent. Also, your email address or your domain name may be automatically recognized when you use the app/website.

We may also collect information about you when you interact with us electronically elsewhere, such as through our other websites, apps or social media sites, or when you click on our online advertising or a link in an email message from us. We may also collect Personal Information from Anheuser-Busch InBev, its affiliate Anheuser-Busch LLC, and their affiliates and subsidiaries (the **ABI Entities**) or from other third parties if you have consented.

Usage Information

Whether or not you create an account, we may collect certain indirect and/or aggregate information as a result of your use of and interaction with the app/website (**Usage Information**) now or in the future. For example, we use cookies to deliver our online services. By continuing to use this website you agree to our use of cookies unless you have disabled them.

Usage Information helps us measure the success of the app/website and its features to improve your online experience. We may use measurement and tracking technologies such as cookies, web server logs or other programs. In addition, we may use web beacons or clear GIFs to recognize you when you visit the app/website or open an email from us. If you are using our app, we may also collect Usage Information through Location Services or other features of the app. We do not use spy ware, adware or any other similarly intrusive software.

Use of information

We use your information for the following business purposes during and after your use of the app/website:

- to provide services you request;
- to respond to inquiries we receive from you or in connection with a transaction or communication you initiate;
- to analyze, manage and improve the app/website;
- to notify you of special offers, promotions or other services that we believe may be of interest to you or to send you current mailings (in each case, only if you have provided an Opt-In);

- to notify you that you have been selected as a winner of a contest or sweepstakes;
- to improve our marketing and consumer communication through data analysis;
- to develop new apps, programs and products for app/website users like you;
- to work with our business partners, affiliates or third parties to provide you with a better consumer experience and/or bring you special offers or promotions (for example through marketing and advertising, contest administration, information technology, data hosting and processing, data analytics, website hosting and similar services);
- to help us diagnose problems with our server or other technical issues relating to the performance of the app/website; and/or
- for any other business purpose stated at the time you provide your information, Opt-In or enable a function on the app/website which allows us to collect information with notice to you.

It is our policy to require only the Personal Information necessary to complete the specific transaction that you request. We do not condition your participation in any specific activity on our app/website on the disclosure of more Personal Information than is reasonably necessary to complete that activity.

Disclosure of information

We may disclose the information we collect from and about you:

(a) when we have reason to believe that such disclosure is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, customers or other users of the website, or anyone else who could be harmed by such activities, or is necessary to enforce the Terms of Use, take precautions against liability, investigate and defend against any third-party claims or allegations, and/or protect the security or integrity of the app/website;

(b) to respond to judicial process and provide information to law enforcement agencies as permitted or required by law, or in the good faith belief that such action is necessary to comply with provincial/territorial and/or federal laws;

(c) to our business partners for research, analytical and marketing purposes, and/or to our subsidiaries, affiliated companies, or other businesses or persons for the purpose of processing any request on your behalf provided that they are bound by data protection obligations at least as restrictive as those in this Privacy Policy;

(d) to the ABI Entities, who may use this information to contact you about offers, promotions, products, services and events; or

(e) otherwise with your consent.

YOU EXPRESSLY AUTHORIZE US TO SHARE YOUR PERSONAL INFORMATION WITH ANY OF OUR AFFILIATED BRANDS, DIVISIONS OR AFFILIATED COMPANIES AND/OR THE THIRD PARTIES WE RETAIN TO PERFORM ANY OF THE BUSINESS PURPOSES LISTED ABOVE.

Other disclosures

We or our affiliates may sell or buy other businesses or entities. In such event, we may transfer or assign the information we have collected as part of such merger, acquisition, sale, or other change of control. In such transactions, your Personal Information may be included in the transferred business

assets. Also, in the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your Personal Information is treated, transferred, or used and your Personal Information may be included in the transferred assets.

IF YOU VOLUNTARILY DISCLOSE PERSONAL INFORMATION IN A PUBLIC OR COMMUNITY FORUM, YOUR INFORMATION MAY BE COLLECTED AND USED BY OTHERS AND MAY RESULT IN UNSOLICITED MESSAGES FROM OTHER PARTIES. WE HAVE NO CONTROL OVER THIS DISCLOSURE OR USE OF YOUR PERSONAL INFORMATION AND YOU AGREE THAT WE ARE NOT RESPONSIBLE FOR IT.

[Access to and correction of Personal Information](#)

On reasonable notice, subject to certain exceptions, you are entitled to access or correct your Personal Information or withdraw your consent.

We have designated a Privacy Officer who is accountable for our compliance with this Privacy Policy in Canada. If at any time you have any questions about this Privacy Policy or your Personal Information, please email us at PrivacyOfficer@labatt.com or write to us at Privacy Officer (Legal Department), Labatt Brewing Company Limited, 207 Queen's Quay West, Suite 299, Toronto, ON M5J1A7, CANADA. Requests for access or correction must be in writing.

We will retain your Personal Information as long as necessary for fulfillment of the purposes for which it was collected or as required by law.

[Changes to the Privacy Policy](#)

We revise the Privacy Policy periodically to keep it current. YOUR USE OF THE APP/WEBSITE FOLLOWING THE POSTING OF ANY REVISED PRIVACY POLICY SHALL BE DEEMED ACCEPTANCE OF THE REVISED POLICY, SO WE STRONGLY RECOMMEND THAT YOU CHECK BACK PERIODICALLY FOR UPDATES. To bring changes to your attention, we note the date the Privacy Policy was last updated below and post a conspicuous announcement of changes next to the link to this Privacy Policy in the app/website.

If, and only if, we revise the Privacy Policy to materially lessen the restrictions on our collection, use or disclosure of your Personal Information, we will make a commercially reasonable attempt to obtain your consent before implementing such revisions.

IF YOU DISAGREE WITH THE TERMS OF OUR PRIVACY POLICY AT ANY TIME, YOUR SOLE REMEDY IS TO TERMINATE YOUR USE OF THE WEBSITE AND INFORM US OF SUCH TERMINATION.

[Detailed information about data collection, use and transfer and our contact with you](#)

[Your Customized Profile](#)

By reviewing your navigation habits on our app/website and other websites, and the Personal Information you provide or that we may collect from other sources with your consent, we develop a Customized Profile for you in order to provide you with the optimum consumer experience, serve you advertisements that are tailored to your interests and contact you about products, events, promotions and services which we believe would interest you.

Third Party Advertising Networks

We may use third party advertising networks to display advertising on our app/website or other apps/websites. These advertising networks use cookies or similar technologies to track your navigation habits on our website and third party websites in order to serve you advertising that is customized to your inferred interests and preferences. Some advertising networks participate in the following industry programs that include web pages to visit to opt-out:

Network Advertising Initiative: <http://www.networkadvertising.org/choices/>

Digital Advertising Alliance: <http://www.aboutads.info/choices/>

Tailored advertising and communications

Using your Customized Profile and/or third party advertising networks, we may serve you tailored advertising and communications.

For example, we may share a cryptographic hash of your email address with a third party website or service provider (by using the hashing process, your email address is never disclosed to the third party). If the hashed email address from us matches the hashed email address from the third party website, the third party identifies you as part of a group of individuals to whom our ads should be served on its website. The third party or service provider may also return certain information about you to us, which is obtained from your profile on the third party site as well as your social network ID, if applicable.

We may use your Usage Information to identify and develop products and services that may be of interest to you and/or share this information with certain third parties for direct marketing purposes with respect to special offers, products, services, programs, promotions, surveys, publications, invitations or other opportunities that may be of interest to certain demographic groups.

Location services

If you are accessing this app/website on a mobile device, you may choose to enable location services and consent to our use of information about your location. Location services uses GPS, Bluetooth, Wi-Fi hotspot, telecommunications tower locations, geofencing and/or other technologies to determine your approximate location while using your mobile device. We may use information about your location to add to your Customized Profile in order to serve you tailored advertising when you visit certain locations, to provide you with the optimum experience, to send you notifications, or to contact you about products, events, promotions and services in which we believe you would be most interested.

You must enable location services on your mobile device before we can use your location data. Location services may operate while you are using the app/website, or it may operate in the background to provide information about your location even if you are not actively browsing the website or using the app, depending on your settings. You can change the use of location services at any time in your mobile device settings.

Push notifications

You may choose to receive push notifications from us in your app. By choosing to receive push notifications, you consent to receiving them from the app from time to time, including in combination with other services provided through the app, such as location services. You can change the use of push notifications at any time in your mobile device settings.

Linked sites

If you provide information to us through a social media app/website or participate in a social media site linked to this app/website, you consent to our use of your information as if it were submitted to us directly through this app/website.

This app/website may contain links to other websites, including social media sites. Other sites have different privacy policies. We are not responsible for the collection, use or disclosure of information collected through other websites and expressly disclaim any liability related thereto. You should review the privacy policy posted on any website which links to or is linked to this app/website.

Credit card information

You may need to provide credit card information to complete a purchase through this app/website. It is our policy to redirect you to a payment processing portal hosted by a third party payment processor. For your protection, we do not maintain credit card information subsequent to transaction processing. This means that for future transactions, you will have to re-enter your credit card information. You should read the privacy policy on our payment processor's website regarding your credit card information before you submit it.

Mobile applications (Apps)

When we offer apps for download we will use commercially reasonable efforts, given the limitations imposed upon us by third party providers such as Apple Inc. and Google Inc., to clearly disclose what, if any information is collected by our app, how it is used, and with whom it is shared.

In the event it is not practically feasible for us to provide this explanation (for example if you download the App directly via your handheld device) this Privacy Policy shall govern any information collected by us as a result of your use of the app.

CERTAIN PRACTICES ARE OUTSIDE OF OUR CONTROL FOR THE APPS YOU DOWNLOAD BECAUSE THEY ARE UNDER THE CONTROL OF A THIRD PARTY. WE CANNOT AND WILL NOT BE RESPONSIBLE FOR THIRD PARTY PRACTICES. ALWAYS READ THIRD PARTY PROVIDER PRIVACY POLICIES BEFORE PURCHASING OR DOWNLOADING ANY APP.

Text messaging

We may run certain campaigns in which you can send a text message to a specific code and Opt-In to receiving future text messages. By opting-in, you agree that we may send messages to your number about new products, promotions, services or offers. If you want to stop receiving text messages, you may Opt-Out at any time. Failure to Opt-Out means you consent to continue receiving text messages.

Although we charge no fee for text messages, your carrier may charge you for each message you receive in accordance with your mobile device plan. We are not responsible in any way for such charges.

Security procedures and data protection

We will take appropriate safeguards to protect the security of Personal Information in our control. We will take steps to help ensure, through contractual or other means, that any third party we deal with only uses your Personal Information for the purposes for which consent was given and that the third party provides a comparable level of data protection to that which we provide.

Unauthorized access to Personal Information

We take commercially reasonable precautions and technical measures to try to protect against the risks of unauthorized access to, erroneous disclosure of, and unlawful interception of Personal Information under our control.

However, your Personal Information could be unlawfully intercepted or accessed by third parties, for example, if the app/website were subject to hostile network attacks, administrative errors, or data breach, theft or loss. We cannot and do not guarantee the security of any information transmitted over the internet. We take steps that we believe are commercially reasonable to limit access to your Personal Information to only those employees and service providers who need access to it. However, we cannot guarantee that your Personal Information may not be accessed, disclosed, altered, or destroyed despite our efforts or as a result of events beyond our reasonable control. Accordingly, we cannot and do not guarantee that your Personal Information is completely secure and safe from such risks.

FOR THE AVOIDANCE OF DOUBT, WE EXPRESSLY DISCLAIM ANY REPRESENTATION OR WARRANTY, WHETHER EXPRESS OR IMPLIED, WITH RESPECT TO ENSURING, GUARANTEEING OR OTHERWISE OFFERING ANY DEFINITIVE PROMISE OF SECURITY IN CONNECTION WITH YOUR PERSONAL INFORMATION.

Transfer of information outside of Canada – data protection

We may transfer Personal Information to affiliates or third parties that perform services on our behalf or otherwise collect, use, disclose, store or process Personal Information on our behalf as described in this Privacy Policy. Some of these affiliates or third parties may be located outside of Canada, including in the United States, the European Union or Brazil, and your Personal Information may be transferred to or processed in these regions or other countries. The measures we take to protect your personal information are subject to applicable legal requirements in Canada and in foreign countries (for example, legal requirements to disclose personal information to government, national security or regulatory authorities in certain circumstances).

Notice to international users regarding applicable law

BY USING THIS APP/WEBSITE, YOU AGREE AND ACKNOWLEDGE THAT IT IS HOSTED IN CANADA.

If you are attempting to access this app/website from a physical location within the European Union, Asia, the United States, or any other region with laws or regulations governing personal data collection, use, disclosure and transfer that differ from Canadian laws, by your continued use of the app/website (which is governed by Canadian law, this Privacy Policy and the Terms of Use) you are transferring your Personal Information to Canada and you consent to:

- (i) such transfer,
- (ii) the application of the laws of Canada and/or the Province of Ontario with respect to any dispute arising from or related to the Privacy Policy and/or your use of the app/website, other than such rules, regulations, case law, and/or international treaties that would result in the application of the laws of a jurisdiction other than Canada or the Province of Ontario, and

- (iii) the exclusive jurisdiction of the courts of the Province of Ontario and/or the Federal Court of Canada sitting in the Province of Ontario.

Please see “Applicable law, jurisdiction and dispute resolution” in the [Terms of Use](#) for further details about your obligations regarding your use of this app/website from abroad.

Miscellaneous

You agree that if any part of the Privacy Policy is determined to be invalid or unenforceable, the invalid or unenforceable provision will be deemed superseded by a valid, enforceable provision that most closely matches the intent of the original provision and the remainder of the Privacy Policy shall continue in full force and effect.

Last Updated: September 2017

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