

## City Email Privacy Policy.

*"A public corporate Privacy Policy is a normal requirement by various governments, however the protection of our customers information is very important to us, far above and beyond such requirements. Rest assured, that the information you provide shall not be sold to outside companies, and your email addresses shall be protected insofar as our technical abilities allow."*

*Disclaimer: This policy applies to CityEmail, the parent company "Wizard Tower TechnoServices Ltd", and it's various corporate subsidiaries, and the services that are provided, collectively known as "our services". For any individual service, some extra policies, disclaimers, and information may be posted or publicized particular to the use of that service. Also, where such services are managed or controlled by a 3<sup>rd</sup> party, (ie where you are using our services as part of a hosting service, provided by such 3<sup>rd</sup> party) CityEmail cannot control the use or information accessible to such 3<sup>rd</sup> parties. If you are using our services via a 3<sup>rd</sup> party, such as an ISP, please consult their individual policies as well.*

CityEmail recognizes that privacy is important, and this policy is meant to explain exactly what when, and where your information can be accessed and used.

Information collected and how we use it:

CityEmail Services are primarily used for Email and Messaging services, and as such personal information is gathered to uniquely identify our customers and their accounts, and to help in ensuring the validity of such information. We also gather information in order to provide demographic specific information to our customers, which can range from such services as weather information etc. As well, some of our customers will enter into billing agreements, that may require the presentation of credit card, and/or banking information. Such information shall only be shared with such financial institutions as required to settle or complete financial transactions for services.

Other information such as names, addresses, email addresses, or other provided information shall only be used to conduct such services, including but not limited to, customer support, abuse investigation, customized services based on demographics, provisioning et al.

At the time of writing, all such services are provided in-house, however when such services are required to be conducted by any 3<sup>rd</sup> party, such 3<sup>rd</sup> parties would have the requirements to conform to the company policies of privacy protection as well. Individual personal information will never be sold, however from time to time we may provide aggregate summary information based on such personal information for statistical or other corporate requirements. We may from time to time offer value added services provided by 3<sup>rd</sup> parties, to sub-groups of our customers based on the data you provide, but the actual personal information will not normally be needed to conduct such services.

We also reserve the right to share personal information with law enforcement agencies, as may be required by law, when presented with the legal authority of such an agency to make such a request, and or to investigate abuse of our systems, or contraventions of our Acceptable Usage Policies, including but not limited to prevention of Child Abuse, Hate Literature, and other issues which are commonly accepted as in-appropriate by either legal or

social standards.

We also do have the ability to monitor usage patterns, such as frequency of visits etc, via “cookies”, which is a small file which your browser will store which uniquely identifies your computer, personal settings, and preferences. Such cookies are used to improve the quality of our service, and normally are a requirement by some or all of our web services. You have the ability to NOT use cookies, but this will prevent access to some of your services. Information about trends and usage may be shared with 3<sup>rd</sup> parties, but only as part of summary information, and individual personal information will not be shared as part of such disclosures.

Our servers and systems also have the ability to log all accesses to the systems, including recording sources of email, from addresses, and other personal information, however such log information containing personal information will not be shared with 3<sup>rd</sup> parties, excepting when required to perform support services, or when filing abuse or spam reports. Web Services and requests are also tracked, however all WebServices which require you to provide personal information, are also protected from interception by Secure Certificates to ensure encrypted communication between your computer and our web services.

We also may receive information via phone or email, and such information will only be used to perform such support or customer service, as is required by you, or our support teams. Occasionally such information may be used to contact our customers so we can improve our services, or follow up with internal satisfaction reviews.

Hosted Email – Some services we provide may be to ISP's, Telco's or companies, and they may need to provide us with your personal information via API's, 3<sup>rd</sup> party tools, or their own services. We process such information in accordance with this Policy. Your services may be provided under individual agreements with such 3<sup>rd</sup> parties, and they may have different privacy practices and we encourage you to read their privacy policies.

Web Links – CityEmail may present certain web links or URLs in such a fashion allows us to track the usage of such links have been followed. We use this information to improve the quality of our services, customized content and advertising.

CityEmail only processes personal information for the purposes as may be described in the specific Privacy Policy specific services, or as covered by this policy. In addition to the above, such purposes include:

- o To Provide such products and services to users, including the display of customized content, materials as is deemed necessary to operate our business.
- o Technical Support, auditing, research and analysis, billing practices as required to service our customers, and maintain, protect and improve our services;
- o To improve the customer experience

Information is normally stored on servers, owned and operated by CityEmail, and or it's parent and brother companies, and are operated in Canada, and covered by local Canadian laws. We may at our discretion, back up personal information, store information, and or retain information, as required or desired by the company. Private information may be accessible to technical, office, and or operational staff, required to provide such services, however such staff are also bound by our privacy policies.

## Choices for personal information

When you sign up for a particular service that requires registration, we ask you to provide personal information. If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use.

If we propose to use personal information for any purposes other than those described in this Policy and/or in the specific service notices, we will offer you an effective way to opt out of the use of personal information for those other purposes. We will not collect or use sensitive information for purposes other than those described in this Policy and/or in the specific service notices, unless we have obtained your prior consent.

## Additional Information sharing

CityEmail will only provide information to 3<sup>rd</sup> parties beyond what is described above, in very specific circumstances, including such cases where we have your explicit consent, and you have the ability to revoke such consent at any time, after which we will not continue to share that information. Information already disclosed, we do not have the ability to retract in normal cases.

We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Policy and any other appropriate confidentiality and security measures. We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of CityEmail, its users or the public as required or permitted by law.

We may share with third parties certain pieces of aggregated, non-personal information, such as the number of users who are from a particular area, for example, or how many users clicked on a particular URL. Such information does not identify you individually. We also may provide information to the company or entity which entered into an agreement on your behalf, ie if your ISP is using our services, we may provide them with information, such as changed passwords, usage patterns, quota allotments etc, as required by them, in order for them to effectively manage their account, and or other services they may provide for you.

## Information security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data.

We restrict access to personal information to CityEmail employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline,

including termination and criminal prosecution, if they fail to meet these obligations.

### Data integrity

CityEmail processes personal information only for the purposes for which it was collected and in accordance with this Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

### Accessing and updating personal information

When you use CityEmail services, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

### Changes to this policy

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Policy without your explicit consent, and we expect most such changes will be minor. Regardless, we will post any Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Policy changes). Each version of this Policy will be identified at the top of the page by its effective date, and we will also keep prior versions of this Privacy Policy in an archive for your review.

For more information on this Privacy Policy, please contact the Privacy Policy Officer, via mail or phone, at the offices of the CityEmail parent company, Wizard Tower TechnoServices:

Att: Privacy Control Officer  
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Surrey, BC,  
Canada,  
V3T 2V1

or 604.589.0037