

**The following is the Privacy Policy by which we gather, use and protect your data.**

Updated 23 May 2018

## **Cotton Candy Privacy Policy**

This Privacy Policy discloses how we gather, use and protect your personal data. This Privacy Policy applies to personal data collected by Cotton Candy Inc. through its website [www.cottoncandy.com](http://www.cottoncandy.com) or, as described below, by other means during the course of its business.

### **1. Controller**

Responsible data controller in the meaning of Art. 4 No. 7 GDPR is:  
Cotton Candy Inc., 2600 Argentia Rd., Mississauga, Ontario, L5N 5V4, Canada;  
Phone +1 905 858 2600; E-mail: [info@cottoncandy.com](mailto:info@cottoncandy.com); Website: [www.cottoncandy.com](http://www.cottoncandy.com)  
You can contact the data protection officer via email at: [privacy@cottoncandy.com](mailto:privacy@cottoncandy.com)

### **2. General Information**

During the course of carrying out our business and performing our services, Cotton Candy collects personal data to conduct our business, provide and market our services, and meet our legal obligations. Likewise, we may also collect personal data for other purposes, which we would describe in more detail to you at the point we collect the personal data.

You may refuse to provide us with some or all of your personal data; however, this may limit the ways in which we can interact with you, including providing you with our services.

### **3. Logfiles**

We collect personal data through our internet access logs. When you access our website, your internet address is automatically collected and is placed in our internet access logs (i.e., log files on server). We also record the URLs of the websites and pages you visit, the times and dates of such visits, information about the computer hardware and software you use.

This information may include Internet protocol (IP) addresses, browser type and version, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data, number of visits, websites from which you accessed our site (Referrer), and websites that are accessed by your system via our site.

The processing of this data is necessary for the provision and the security of our website. The legal basis for this processing is Art. 6(1)(f) GDPR. We do not link these data to certain individuals. After the processing for the mentioned purposes, the data will be deleted.

#### **4. Contact**

On our website we use several contact forms which can be used to get in contact with us electronically. To handle your request it is necessary to provide us with a valid email address, and, in addition, we store your IP address and the time of your request to prevent any misuse of our contact forms. Alternatively, you may contact us via the e-mail addresses cited above (Section 1). If you use one of these channels, the personal data transmitted will be stored automatically by Cotton Candy as data controller to handle our contact with you. The legal basis for this processing is Art. 6(1)(f) GDPR.

In some cases we may ask you for further information, such as name, occupation, address or telephone number. Regarding the processing of this personal data you will be asked to grant your explicit consent. The legal basis for this processing is Art. 6(1)(a) GDPR.

#### **5. Unsolicited special categories of personal data**

Other than the information you provide when you apply for a job at Cotton Candy, we do not generally seek to collect special categories of personal data through this site.

"Special categories of personal data" includes the various categories of personal information and data identified by privacy laws of United States, European and other jurisdictions as requiring special treatment, including in some circumstances the need to obtain explicit consent. These categories may include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning sexual orientation (Art. 9 GDPR).

Therefore, we advise you not to provide any unsolicited sensitive personal data. ThoughtWorks applies HTTPS or other appropriate technical and organizational measures to secure the personal data transmitted over its website.

#### **6. Cookies (General Information)**

Cotton Candy websites make use of cookies to save and retrieve information about your visit to our sites. Cookies are small files of software which save and retrieve information about your visit to a website or application. They reside in your internet browser to help remember your preferences and previous activity. You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

Cookies currently used on our site identify you as an anonymized number. We and our partners (e.g., marketing partners, affiliates, or analytics providers) use cookies and log files to analyze trends, administer the website, track users movements around the website, and gather demographic information about our user base. We

may receive anonymized reports based on the use of these technologies by our partners on an aggregated basis. We also use this data to provide the site's content, ensure the functionality of our information technology systems, and to optimize our website. The legal basis for this processing is Art. 6(1)(f) GDPR. The data of log files will be stored separately from your other personal data.

Users can control and refuse the use of cookies at the individual browser level. Cookies installed can be deleted. If you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited.

When you visit our website, the following categories of cookies will be set in your browser:

### **11.1 Strictly necessary cookies**

These cookies are essential in order to enable you to move around a site and use its features. Without these cookies services you have asked for cannot be provided. Registered Visitor Cookie - A unique identifier given to each registered user; used to recognize you anonymously through your visit and when you return to the site.

### **11.2 Performance cookies**

These cookies collect information so that we can analyze how our visitors use our site. These cookies do not collect information that identifies you. All information these cookies collect is anonymous and is only used to improve how our site works.

### **11.3 Functional cookies**

These cookies allow websites and applications to remember choices you make (e.g., such as your user name or the region you are in) and provide enhanced, more personal features.

We may use information collected from functional cookies to identify user behaviour and to serve content based on the user profile. These cookies cannot track your browsing activity on other websites. They do not gather any information about you that could be used for advertising or to record where you've been on the Internet outside our site.

### **11.4 Analytics cookies**

In order to keep our website services relevant, easy to use and up-to-date, we use web analytics services to help us understand how people use the site. Cookies allow web analytics services to recognize your browser or device and, for example, identify whether you have visited our website before, what you have previously viewed or clicked on, and how you found us. The information is anonymous and only used for statistical purposes, and it helps us to analyze patterns of user activity and to develop a better user experience.

## **12. Third Party Applications**

We will respect and protect your privacy as set out in this Privacy Policy. We will share your personal data with third parties only in the ways that are described in this Privacy Policy - and do not and will not sell your personal data.

Cotton Candy shares your personal data with third parties, in particular non-Cotton Candy parties, only with your express consent or under another lawful basis for processing under the applicable law.

Categories of non-Cotton Candy parties with which we share your personal data include vendors such as host and cloud service providers, marketing and mailing agencies, and subcontractors involved in the fulfilment of our contractual obligations towards our clients. The legal basis for this processing is Art. 6(1)(f) GDPR.

## 12.1 Google Analytics

Our website uses Google Analytics, a web analysis service of Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, [www.google.com](http://www.google.com) ("Google Analytics" or "Google"). Google Analytics employs cookies that are stored to your computer in order to facilitate an analysis of your use of the site. The information generated by these cookies, such as time, place and frequency of your visits to our site, including your IP address, is transmitted to Google's location in the US and stored there.

In using Google Analytics our website employs the extension "anonymizelp". In doing so, Google abbreviates and thereby anonymizes your IP address before transferring it from EU/EEA member states. Google uses this information to analyze your use of our site, to compile reports for us on internet activity and to provide other services relating to our website.

Google may also transfer this information to third parties where required to do so by law or where such third parties process this data on Google's behalf. Google states that it will in never associate your IP address with other data held by Google. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly as noted elsewhere in this Privacy Policy. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website.

Google Analytics also offers a deactivation add-on for most current browsers that provides you with more control over what data Google can collect on websites you access. The add-on tells the JavaScript (ga.js) used by Google Analytics not to transmit any information about website visits to Google Analytics. However, the browser deactivation add-on offered by Google Analytics does not prevent information from being transmitted to us or to other web analysis services we may engage.

Google Analytics also uses electronic images known as web beacons (sometimes called single pixel gifs) and are used along with cookies to compile aggregated statistics to analyze how our site is used.

You can find additional information on how to install the browser add-on referenced above at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

For the cases in which personal data is transferred to the US, Google has self-certified pursuant to the EU-US Privacy Shield (<https://www.privacyshield.gov/EU-US-Framework>).

## 12.2 Google Tag Manager (GTM)

Google Tag Manager (GTM") is a tag management system to manage JavaScript and HTML tags used for tracking and analytics on websites. Tags are small code elements that, among other things, are used to measure traffic and visitor behaviour: to understand the effect of online advertising and social channels; to set up re-marketing and orientation towards target groups; and to test and optimize websites. GTM makes it easier for us to integrate and manage our tags. We use GTM on our website to include the following tracking tools (as in described in detail this Section 12):

- Google Analytics

If you have performed deactivation, GTM takes this deactivation into account. For more information about GTM's privacy practices can be found at <https://policies.google.com/privacy?hl=en> and terms of use at <https://www.google.com/analytics/tag-manager/use-policy/>

### **13. Social Media Links**

You can find Cotton Candy on the following social media:

- Twitter
- Facebook
- LinkedIn
- Instagram

These providers are controllers for the relevant data processing.

### **14. Deletion and Term of Storage**

Cotton Candy processes and stores your personal data only for the time necessary to achieve the stated purpose (unless otherwise stated in this Privacy Policy) and as permitted under the applicable laws or regulations.

As soon as the purpose for data storage is achieved, or the appropriate term of storage provided for by any applicable laws or regulations expires, your personal data will be deleted consistent with this and any other applicable Cotton Candy policies (e.g., document retention and/or records management policy) unless your personal data are required for the formation of or performance under a contract.

### **15. Your rights as data subject**

You have the following rights:

- Right of access;
- Right to rectification or erasure;
- Right to restriction of processing;
- Right to object;
- Right to data portability.

You can require this by sending us an email at [privacy@cottoncandy.com](mailto:privacy@cottoncandy.com).

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the location of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the applicable data protection laws and regulations.

### **16. Changes to the Policy**

This Privacy Policy may be updated from time to time and will note the date of any updates. In the event of any material and significant changes we will endeavor to provide a more prominent notice of the changes to this Privacy Policy.