

Howlhost.ca Privacy Policy

This Privacy Policy applies to personal information collected, processed, or stored online at howlhost.ca and describes the extent of collection and use of personal information by howlhost.ca (Hereinafter - HOWLHOST). HOWLHOST is a data controller of personal data processed in accordance with this Privacy Policy. HOWLHOST has the greatest respect for your privacy and gives special attention to the confidentiality of information submitted to us when you visit our websites (current and future websites, owned or operated by HOWLHOST, and/or for which HOWLHOST currently or in the future provides services and/or products, hereinafter - the "Site" or "Sites") or otherwise communicate or interact with us.

This version of the Privacy Policy is effective January 4, 2019.

1. General Provisions

1.1 - This document, Howlhost Privacy Policy (hereinafter - the Policy), contains our policies and provisions concerning the information collected about the User by HOWLHOST.

1.2 - By visiting our Site, using its services and/or downloading, installing, and using the HOWLHOST's software products (hereinafter - Applications), you accept all terms and conditions of this Policy.

1.3 - This Policy is a part of a body of documents that set terms and conditions of use of the Site and of Applications respectively. Other documents defining the relationship between the User and HOWLHOST are Terms of Use and the End User License Agreement (EULA).

1.4 - Unless defined otherwise by this Policy, all terms and definitions used herein shall have the meaning defined in the Terms of Use and EULA.

1.5 - This Policy, including its construction, method of adoption, performing, amending and termination is subject to the laws and legislation of the province of Newfoundland and Labrador, CANADA.

2. Personal information

2.1 - Personal information means information that can be associated with a specific User, including but not limited to: name (pseudonym or nickname), email address, telephone number (e.g., in cases when you request individual technical support or assistance), and information about User's purchases and activations of Applications (preference categories and other types of preference-related advertising), payment methods, payment currencies or other payment data.

2.2 - For website personalization, we also gather information about the devices you use to access our sites (desktop and mobile); this may include the IP address and other geolocation data, browser type and version, operating system and system language, referring website, time of access and other data.

2.3 - HOWLHOST processes the personal information that the User provides about themselves by filling out respective forms. For example, when subscribing to email newsletters, contacting HOWLHOST via feedback forms, etc. HOWLHOST may set out the requirements to the information that is mandatory to provide the User with our services. If some information is not marked by HOWLHOST as mandatorily required, the User may submit or disclose such information at his own discretion.

2.4 - Our Privacy Policy is based on the following principles:

- We process user data exclusively for the purposes and according to the methods provided when the data was collected.
- We use the collected data for purposes in addition to those for which it was released only when the user has expressly consented.
- We let third parties access the provided data exclusively for the purposes of performing the service requested and within the context of appointing a data processor or additional controller.
- We do not disclose the data, assign or transfer it to third parties for their own processing unless the User have been informed in advance and have given their consent.
- We respond to requests for cancelling, changing, or adding the data provided.
- We ensure proper and lawful data management.
- We safeguard the privacy of users and apply appropriate security measures to protect the confidentiality, integrity, and availability of the data provided.

2.5 - If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws, but no longer than reasonably necessary in light of the purposes above.

2.6 - If the information submitted by you contains personal data, by using our Site, services or products or by providing personal information to us, you freely and voluntarily grant HOWLHOST written informed consent to process that data for the purposes defined by this Policy. This includes any action (operation) or sequence of actions (operations) performed with or without using automated tools: collecting, recording, sorting, accumulating, storing, specifying (updating, changing), withdrawing, using, transferring (distributing, providing, accessing) information to third parties, including cross-border transfer to other jurisdictions, disclosing or making available, anonymization, restriction, blocking, deleting, and destruction of personal data. The consent can be revoked at any time with immediate effect for the future by emailing us at support@howlhost.ca.

2.7 - User files and data storage. All the files that are being uploaded to our Site for the further processing are kept on our servers for as long as reasonably required to provide subscribed services or products.

2.8 - Sensitive information. HOWLHOST does not collect sensitive personal data such as sexual preferences, religion, political views, or health conditions. We will not request it from you, and neither do we need it.

2.9 - Data on children. Persons under the age of 13 should not transfer personal information to us unless they have a verifiable permission of their parent(s) or legal guardian(s). Our Site, products and services are intended for users who are 13 years of age and older. We do not knowingly collect such data, but if a parent, guardian or anyone else becomes aware of personal information we have collected from an individual under the age of 13, please contact us.

2.10 - Your personal data is protected by legal rights, which include your right to request access to your personal data; object to or restrict our processing of your personal data; request that your personal data is erased or corrected; export your data in a machine-readable format; transmit those data to another controller. For more information or to exercise your data protection rights, please contact us using the contact details below. You can always update or delete your personal information on our sites. If at any time you would like us to delete or change any of your personal information, just email us at support@howlhost.ca.

3. Anonymized Data

3.1 - When you use the Site or Applications, anonymized data may be transmitted automatically to HOWLHOST. The data transmitted includes but is not limited to: your IP-address, location (country, area, city), browser version, traffic source, hardware model and other device-specific information, operating system version, unique device identifiers, statistical information about your actions on the Site and Application use, statistical information about the data that is being sent and received via the Application.

3.2 Anonymized data may be collected and/or processed using the services of the third parties, such as:

- analytics services;
- social network plugins;
- other systems and services that use and process anonymized user data.

4. Use of Personal Information

4.1 - HOWLHOST uses Personal information for the following purposes:

- Execution and performance of License agreements with the User;
- Identification of the User in the course of fulfilling HOWLHOST's obligations under the agreements with the User;
- Communication with the User for the purposes of informational support and improvement of the Applications, including notification through third parties;

- Distribution of advertising materials of HOWLHOST and/or third parties among Users as the targeted audience;
- Targeting of advertising and/or informational materials.

4.2 - HOWLHOST may share Personal information with service providers that provide services on our behalf when it is necessary for provision of such services within the limits of the purposes listed above.

5. Use of Anonymized Data

5.1 - HOWLHOST uses anonymized data for the following purposes:

- Improvement of the Site and Applications;
- Communication with the User for the purposes of informational support and improvement of the Applications, including notification through third parties;
- Distribution of advertising materials of HOWLHOST and/or third parties among Users as targeted audience;
- Targeting of advertising and/or informational materials by age, gender or other attributes;
- Marketing, statistic and other research based on anonymized data.

5.2 - HOWLHOST may provide anonymized data to service providers that provide services on our behalf when it is necessary for provision of such services within the limits of the purposes listed above.

5.3 - Cookie Notice. This notice is designed to help you understand what cookies are, how HOWLHOST uses them and the choices you have regarding their use. By continuing to use our sites, you are agreeing to use of cookies in the manner described in this notice.

What are cookies?

Cookies are small text files that are stored on your browser or the hard drive of your computer or other device when you visit our Site. This allows the Site to recognize you as a user either for the duration of your visit (using a ‘session cookie’) or for repeat visits (a ‘persistent cookie’). They are not harmful and do not contain any information such as your home address, date of birth or credit card details.

The cookies we use fall into four broad types:

- **Strictly Necessary Cookies**

These cookies are essential for helping you to navigate our Site and use its features. Without these cookies, the services you have asked for cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you've been on the Internet.

- **Analytical/Performance Cookies**

In order to keep the Site, services, and products relevant, easy to use and up to date, we use web analytics services to help us understand how people use our Site. For example, we can see which parts of the Site are most popular, identify when errors occur, and test different versions of a page or feature to see which one works best.

- **Functionality Cookies**

These cookies allow websites and applications to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. The information these cookies collect is usually anonymized which means we cannot identify you personally. They do not gather any information about you that could be used for selling, advertising, or remembering where you've been on the Internet, but help us provide advertising that is more relevant to you.

The information stored in cookies is safe and anonymous to any external third party, and your account security is never compromised. For information on how to disable cookies, please consult the "Help" tab of your browser via the menu bar. Should you need any help, please contact us via email below.

6. User's Consent to Receiving Information from HOWLHOST

6.1 - Our Site and Applications offer news and information regarding our products by subscription, including email newsletters. If you decide to subscribe to these services, you may be asked to provide your email address. By doing so, you agree to receive emails from HOWLHOST with information about updates and any other information related to the Applications, as well as other types of information from HOWLHOST, including advertisements. We may use the information you provide to help develop content that is relevant to our users. You are free to cancel your subscription(s) at any time.

6.2 - To cancel your subscription, follow the instructions in the bottom of the letter or email us at support@howlhost.ca and a request deletion of your data from the mailing list. In this case, HOWLHOST will keep your Personal information in its database, but will not contact you unless you change your mind on this issue.

7. Confidentiality of User Information

7.1 - HOWLHOST stores information of Users and takes necessary and sufficient organizational and technical security measures of protection from unauthorized access and disclosure in compliance with internal rules and procedurs.

7.2 We maintain safeguards for the protection of personal information. These safeguards include the following:

- **Safeguards:** Access to the personal data of users is limited to authorized personnel who have a legitimate need to know based on their job descriptions - for example, employees who provide technical support to end users. All such data is subject to password protection.

8. Third Parties

8.1 - To facilitate marketing, Applications support and development HOWLHOST uses services of third parties. Some types of third parties with whom we share your data are:

- **IT companies:** HOWLHOST works with businesses that support our website and other business systems.
- **Payment processing:** HOWLHOST works with trusted third-party payment processing providers in order to securely take and manage payments.

Here is the list of third-party companies we are cooperating with for business purposes:

Google Analytics

Google Analytics is a web analytics service provided by Google, Inc. Google Analytics uses cookies to help the website analyze how users use the site. The information generated by the cookie is transmitted to and stored by Google. Google will not associate your IP address with any other data held by Google. Google Analytics help us understand the use of our site by our visitors. Because Google Analytics require cookies to function, users who wish to avoid tracking by Google Analytics while on our website can disable cookies in their browser. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Square, Inc.

HOWLHOST uses Square, Inc. (www.squareup.com) for processing of secured payments for purchases made on the Site. The entire purchase process is managed by Square, who acts as HOWLHOST's authorized merchant and reseller. By making a purchase on the website via Square, you authorize HOWLHOST to use Square to process your transactions and to transfer personal information to them, but only to the extent needed to complete the transaction and manage your purchases. No credit card information is ever stored on servers controlled by us. Square has our permission to store, on our behalf, the data pertaining to the executed transactions by customers of the website (including credit card information) with the goal of ensuring a secure method of payment and proof of purchase archive, allowing for the protection of our customers, and for follow-up as needed. This transactional data may be used for validation and registration purposes of our customers, and to trace any fraudulent activities if necessary.

CanSpace Solutions

We use CanSpace as our cloud hosting service provider.

8.2 - The Site and Applications may contain links to third-party websites. When the User follows these links, he/she leaves the Site/Application, so HOWLHOST takes no responsibility for the safety of User Data during the use of third-party websites. Such websites may have their own privacy policy setting out the rules of collection and storage of User Data. This Policy does not cover the data which is submitted to, stored or used by third-party websites. We recommend that you carefully review the privacy policy of such third parties when using their websites.

8.3 - HOWLHOST is not responsible for the use of User data by the third parties that the User interacts with in the course of using the Application.

9. Other Disclosures of Personal Information

HOWLHOST may disclose Personal information to third parties in the following cases:

- At the User's expressed consent to such disclosure.
- The transfer of HOWLHOST's assets to possession, use or ownership of a third-party including assignment of rights under the executed agreements with the User to such third party.
- At the request of a court or other authorized governmental agency to the extent required under applicable legislation.
- For the purpose of protection of HOWLHOST's rights with respect to the breach of agreements executed with the User.

10. Amendments

10.1 - This Policy may be amended or cancelled by HOWLHOST at its own discretion without prior notification of the User. We recommend that you regularly read the latest version of the Privacy Policy.

10.2 - A new version of the Policy is effective from the moment of its publication unless specified otherwise by such new version of the Policy.

10.3 - The currently effective version of the Policy is available at HOWLHOST at <https://howlhost.ca/documents/Privacy.pdf>.

We highly value your trust and are always ready to answer your questions about the handling of your personal data.

If you have any questions or concerns, contact us at support@howlhost.ca.