

# PRIVACY POLICY

Twinkle After Dark ("us", "we", or "our") operates the twinkleaftardark.com website (the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. We are proud to be in compliance with the Personal Information Protection and Electronic Documents Act of Canada.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from twinkleaftardark.com.

## DEFINITIONS

o **Personal Data** - Personal Data means data about a living individual who can be

identified from those data (or from those and other information either in our possession or likely to come into our possession). It does not include information solely used to communicate with you in relation to your employment, business or profession;

o **Usage Data** - Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

o **Cookies** - Cookies are small files stored on your computer device for the purpose of keeping your Personal Data coordinated to your computer device between individual times of access to the Service.

o **Data Controller** - Data Controller means Twinkle After Dark, acting jointly with Third Party Service Providers and other contractors from time to time, when determining the purposes for which and the manner in which any Personal Data are, or are to be, processed.

o **Data Processor (or Service Providers)** - Data Processor (or Service Provider) means any person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

o **Data Subject** (or User) – Data Subject (or user) is any individual or Corporation who is using our Service and is the subject of Personal Data.

o Third Party Service Providers – any individual or corporation providing a service, plug-in, module, or other platform for the Service, each of whom will be operating under their own privacy policy.

## INFORMATION COLLECTION AND USE

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Types of data collected:

### Personal Data

Personally identifiable information may include, but is not limited to:

o Email address

o First name and last name

- o Phone number
- o Address, City, Province, Postal Code
- o Details when you complete a questionnaire or survey
- o Cookies and Usage Data

In using our Service, we will be asking you to opt in to the use of your Personal Data to contact you with newsletters, updates, marketing or promotional materials. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

Certain aspects of the Service may require you to opt in for the Service to function. If you do not opt in, we reserve the right to refuse use of the Service to you.

Consent must be provided by you before we use or disclose your Personal Data. Using our Service and providing the requested data will include a consent to disclose and use that information for site purposes. We will seek consent if we want to use or disclose your data for any other purpose not already written into this policy.

## **USAGE DATA**

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

## **TRACKING & COOKIES DATA**

Cookies and similar tracking technologies are used to track the activity on our Service and we hold certain information as a result of using cookies.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

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 some portions of our Service.

### **Examples of Cookies we use:**

- o Session Cookies. We use Session Cookies to operate our Service.
- o Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- o Security Cookies. We use Security Cookies for security purposes.
- o Advertising Cookies. Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

## **USE OF DATA**

Twinkle After Dark uses the collected data for various purposes:

- o To provide and maintain our Service
- o To notify you about changes to our Service
- o To allow you to participate in interactive features of our Service when you choose to do so
- o To provide customer support
- o To gather analysis or valuable information so that we can improve our Service o To monitor the usage of our Service
- o To detect, prevent and address technical issues
- o To coordinate our Service with those of other Third-Party Service Providers
- o To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

## **THIRD PARTY SERVICE PROVIDERS**

As part of providing the Service, we are contracting for the use of modules, plug-ins, services, platforms, and other technologies from Third Party Service Providers. Each such Provider will have their own privacy policies and terms of use, and all such Third Party Service Providers will be identified to you. If these Third Party Service Providers will also be collecting Personal Data or Usage Data, you must agree to their privacy policies separately.

## **RETENTION OF DATA**

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies. For so long as Personal Data is being retained, it will be under the control of the data control officer of Twinkle After Dark, or its most senior director if no such primary officer has been named.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

## **TRANSFER OF DATA**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside Canada and

choose to provide information to us, please note that we transfer the data, including Personal Data, to Canada and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all the steps reasonably necessary and legally required to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Data will be stored in Canada and subject to Canadian regulations wherever possible; however, if you agree to use our Service and any included Third Party Service Providers' services, your data may be transferred to another jurisdiction and subject to those regulations

## **DISCLOSURE OF DATA**

### **Business Transaction**

Business transactions that involve a change of control or a substantial portion of it or its assets, and will result in notice to you if the Personal Data is to be transferred under that transaction; if the Personal Data is not transferred, it will instead be destroyed such that no party will have access to it, and no notice will be provided.

### **Disclosure for Law Enforcement**

Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Legal Requirements**

We may disclose your Personal Data in the good faith belief that such action is necessary to: Comply with a legal obligation; protect and defend the rights or property we own; prevent or investigate possible wrongdoing in connection with the Service; protect the personal safety of users of the Service or the public; protect against legal liability that we may carry.

## **SECURITY OF DATA**

No method of electronic transfer is 100% secure. We will use commercially acceptable transmission methods, but we do not guarantee absolute security of your Personal Data in transmission.

## **YOUR RIGHTS**

Twinkle After Dark aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

Whenever made possible, you can update your Personal Data directly by contacting us to make the required changes. If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the right:

- o To access and receive a copy of the Personal Data we hold about you
- o To rectify any Personal Data held about you that is inaccurate

o To request the deletion of Personal Data held about you

You have the right to data portability for the information you provide to us. You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it. Please note that we may ask you to verify your identity before responding to such requests.

## **SERVICE PROVIDERS**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Analytics**

We use Google Analytic, a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web

page: <http://www.google.com/intl/en/policies/privacy/>

### **Advertising**

We may use third-party Service Providers to show advertisements to you to help support and maintain our Service. These include, but are not limited to:

Google AdSense DoubleClick Cookie – Google, as a third party vendor, uses cookies to serve ads on our Service. Google's use of the DoubleClick cookie enables it and its partners to serve ads to our users based on their visit to our Service or other websites on the Internet. You may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page: <http://www.google.com/ads/preferences/>

Bing Ads – Bing Ads is an advertising service provided by Microsoft Inc. You can opt-out from Bing Ads by following the instructions on Bing Ads Opt-out page: <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>. For more information about Bing Ads, please visit their Privacy Policy: <https://privacy.microsoft.com/en-us/PrivacyStatement>

### **Behavioral Remarketing**

Twinkle After Dark uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

o **Google AdWords** Google AdWords remarketing service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings

page: <http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt -out Browser Add-on <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

o **Facebook** Facebook remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950> To opt-out from Facebook's interest-based ads follow these instructions from

Facebook: <https://www.facebook.com/help/568137493302217> Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the

USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

o **YouTube** – YouTube remarketing service provided by Youtube Inc. in association with the Google Ads Platform and is fully integrated with that platform. Google Ads (Adwords) services are fully covered by the above policies provided.

o **Instagram** – Instagram remarketing service provided by Instagram Inc. in association with the Facebook platform. In addition to Facebook's privacy policies, Instagram provides service- specific policy at: [https://help.instagram.com/519522125107875?helpref=faq\\_content](https://help.instagram.com/519522125107875?helpref=faq_content).

## **Payments**

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processor we work with is Showpass and their Privacy Policy can be viewed at <https://www.showpass.com/sell/privacy-policy>.

## **Technical Support**

In order to provide our customers with technical support and general inquiries, we may use services provided by third party.

## **COMMUNICATION**

We may use marketing automation platforms that interact or use our mail server. In using this service, your Personal Data will be provided to, and reside on, those servers for the duration of our engagement with them. We will take all reasonable steps to maintain exclusive control over the Personal Data and to ensure the Personal Data is removed from those servers at the end of any engagement. These include, but are not limited to:

**MailChimp** – MailChimp is an automated marketing platform that uses contact list information provided to them to craft and automate the sending of crafted marketing emails under our express direction. MailChimp does not further re-transmit Personal Data we provide to MailChimp. You can learn more about the privacy practices of MailChimp at <https://mailchimp.com/legal/privacy>.

If we are using other services, links to their Privacy Policies will be provided through our Service. If you cannot find those links, please contact us.

## **LINKS TO OTHER SITES**

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **SECURITY PROTOCOLS**

Security protocols for this website are maintained to commercial standards – for example, SSL technology is employed where or if we collect credit card information. We will take all reasonable technical, contractual, administrative and physical security steps to protect Personal Data. Where your input is required to create a layer of security (e.g., creating a password or account), it is your responsibility to secure the input you have provided. We cannot guarantee the security of your computer device or passwords.

## **CHILDREN'S PRIVACY**

Our Service does not address anyone under the age of 13 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 13.

If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## **CHANGES TO THIS PRIVACY POLICY**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email (if you are subscribed to our newsletter) and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **CONTACT US**

If you have any questions about this Privacy Policy, please contact us by email:  
[info@twinkleafterdark.com](mailto:info@twinkleafterdark.com)