



PRIVACY POLICY

Last updated 27 August, 2020

Thank you for choosing to be part of our community at **Go By Bike Week/Greater Victoria** (“**GBBW**,” “we,” “us,” or “our”) and the **Bike Victoria Society**. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at: admin@biketowork.ca.

When you install our mobile application (“App”), and use our services, you trust us with some of your information. We take your privacy very seriously. In this privacy notice, we describe our Privacy Policy. We seek to explain it in the clearest way possible what information we use, how we use it and what right you have regarding it. We hope you take the time to read through this policy carefully. If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of our App and our service.

This Privacy Policy applies to all information used by our mobile application and/or any related services, sales, marketing or events.

Please read this Privacy Policy carefully as it will help you make informed decisions about use of our App.

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1. What information do we use?

Information automatically collected:

Briefly: some information - such browser and device characteristics - is collected automatically when you use our App.

We automatically collect certain information when you visit, use, or navigate our App. This information does not reveal your specific identity (like name or contact information) but may include device type and usage information, such as your browser and device characteristics, operating system, language preferences, device name, country, location, information about how and when you use our App and other technical information. This information is primarily needed to maintain the operation of our App, and for our internal analytics and reporting purposes.

Like many businesses, we also collect this non-identifying information through cookies and similar technologies.

Information collected through our App:

Briefly: we may collect information regarding your geo-location, mobile device, and push notifications when you use our App.

If you use our App, we may also collect the following information:

- **Geo-Location Information:** We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data:** we may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, and version information.
- **Push Notifications:** we may request to send you push notifications regarding special announcements from the administrators of the mobile application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

2. How do we use the information?

Briefly: we process your information for purposes based on legitimate App functionality and for purposes of improving App performance.

We use information collected via our App for a variety of legitimate purposes described below. We process the information for these purposes in reliance on our performance interests in order to enter into or perform a contract with you, with your consent, and/or for compliance with our functional obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use information we collect:

- *For Business Purposes.* We may use your information for business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our App functionality, and to evaluate and improve our App, products, services, and your experience.
- *For App Functionality.* We may use your information to enhance the function of our App, specifically to assist in geo-location and location services provided by the App.

3. Will any information be shared?

Briefly: we only share information with your consent, to comply with laws, or to fulfill App functionality and business obligations.

We may process or share data or non-identifying information based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use the information for a specific purpose.
- **Legitimate interests:** We may process your data when it is reasonably necessary to achieve our legitimate business and functionality interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your non-identifying information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your non-identifying information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your non-identifying information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your non-identifying information in the following situations:

- **Third-Party Service Providers.** We may share your data with third party service providers or agents who perform services for us on our behalf and require access to such information to do that work. Examples include: data analysis, hosting services, geo-location tracking technology, and information allowing these providers to collect data about how you interact with the App over time. This non-identifying information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online and App-use activity. We do not share, sell, rent, or trade any of your information with third parties for their promotional purposes.

4. Who will the information be shared with?

Briefly: we only share your non-identifying information with the following third parties.

We only share and disclose your information to the following third parties. We have categorized each party so that you may easily understand the purpose of our data collection and processing practices.

- Mobile Analytics: Google Analytics and Google Analytics for Firebase
- App Performance Monitoring: Firebase Crash Reporting

5. Do we use cookies and other tracking technologies?

Briefly: we do not set cookies on your mobile device.

Our third parties (Google Maps API) may use tracking technologies such as beacons and pixels to access or store information. Specific information about how Google uses such technologies and how you can refuse certain beacons is set out in Google's Privacy Policy: <https://policies.google.com/privacy>

6. Do we use Google Maps?

Briefly: Yes, we use Google Maps for the purpose of providing better service.

This mobile application uses Google Maps APIs. You may find the Google Maps API terms of service at: <https://cloud.google.com/maps-platform/terms/>

To better understand Google's Privacy Policy, please refer to: <https://policies.google.com/privacy>

7. How long do we keep the information?

Briefly: We keep the information for as long as is necessary to fulfill the purposes outlined in this Privacy Policy unless otherwise required by law.

We will only keep your non-identifying information for as long as it is necessary for the purposes set out in the Privacy Policy, unless a longer retention period is required by law. No purpose in this policy will require us keeping your non-identifying information for longer than 3 months.

8. How do we keep the information safe?

Briefly: we aim to protect your non-identifying information through technical security measures.

We have implemented appropriate technical security measures designed to protect the security of any data we process. However, please remember that we cannot guarantee that the Internet itself is 100% secure. Although we will do our best to protect your non-identifying information, transmission of such information to and from our App is at your own risk. You should only access services within a secure environment.

9. Do we collect information from minors?

Briefly: we do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly collect data from or market our App to children under 18 years of age. By using this App, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the App.

10. What are your privacy rights?

Briefly: you may review, change, or terminate use of this App at any time.

If you are resident in the European Economic Area and you believe we are unlawfully processing your information, you have the right to complain to your local data protection supervisory authority. You can find their contact details at:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

11. Controls for do-not-track features.

Some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting that can be activated to signal privacy preference to not have data about online activities monitored or collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT signals or any other mechanism that automatically communicates a user's choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

12. Do California residents have specific privacy rights?

Briefly: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain, once a year and free of charge, a report about categories of personal information we disclosed to third parties. Since our mobile App collects no personal information, we are in compliance with California Civil Code 1798.83, and no report need be provided to California residents.

13. Do we make updates to this policy?

Briefly: yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this Privacy Policy from time to time. Updated versions will be indicated by an updated “Revised” data and the updated version will be effective as soon as it is accessible. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your information.

14. How can you contact us about this policy?

If you have questions or comments about this policy, you may contact our Executive Director, serving as Data Protection Officer (DPO):
Adam Krupper, Executive Director
email admin@biketowork.ca.

If you have further questions or comments about us or our policies, you may contact us by postal mail at:

Bike Victoria Society
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Victoria BC, V8T 2A5
Canada

