THE CANADIAN KENNEL CLUB
PRIVACY POLICY

Effective Date: November 2, 2026

At The Canadian Kennel Club (referred to here as "CKC" or "we" or "our"), we respect your privacy and take great care in protecting your personal information. As a non-profit organization, we are dedicated to encouraging, guiding, and advancing the interests of purebred dogs and their responsible owners and breeders in Canada. In light of this work, members, dog owners and breeders, as well as other individuals interested in learning more about dogs entrust us with personal information.

We have committed to the following principles in order to safeguard personal information and ensure its responsible collection and use:

1. Be transparent about how we handle your personal information and our privacy practices;
2. Use your personal information to benefit you and enhance your experience in using CKC's services;
3. Protect your personal information and handle it responsibly.

Definition of Personal Information

"Personal information" is any information about an identifiable individual, other than an individual's business contact information that is used to communicate with the individual in relation to their business, employment or profession. Thus, personal information includes, but is not limited to: contact information (including address, phone number and e-mail address); the date of birth of a member or customer, such as a dog breeder or owner who registers a dog or registers for an event; personal preferences and interests; information collected automatically when you interact with us on-line, and demographics that help CKC tailor programs and services for you.

Personal information does not include anonymous or aggregated information that cannot be tracked back to you personally. Aggregate information refers to personal information compiled and expressed in a summary form where no personal identifiers are included. For example, we may use aggregate data to improve the quality and efficiency of our programs, products and services, and we disclose aggregate information to Agriculture Canada in accordance with the *Animal Pedigree Act*.

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1.0 Scope and Application

This Privacy Policy ("Policy") relates to the personal information collected by CKC, often referred to in this policy as "we", "us" or "our". This information could be collected through CKC employees, volunteers or websites, including the CKC Portal.

In this Policy, we describe what personal information we collect; how we use, share and manage it; how you can access, update and/or correct your personal information; and the privacy choices available to you.

A. Does this Privacy Policy Apply to other Entities who CKC Collaborates with?

This Policy does not apply to independent entities such as the following:

- Dog Breeders who also possess dog owner information;
- Organizations whose resources or events are published by CKC;
- CKC sponsors/partners, such as Trupanion (pet insurance) or Royal Canin (dog food); or
- Government entities or research institutions who may possess personal information.

B. What does this Privacy Policy Include?

This Policy describes how we handle your personal information, i.e. what we collect, and how we collect, use, share, protect and store it. We also explain your Privacy Choices and how you can exercise those choices.

This Policy applies to you when you visit one of our websites; sign up to receive information from us; use any of our services; register for any of our programs or events; apply for our awards or scholarships; express interest in CKC; or enter into a contract with us.

Please note that additional terms and conditions may apply to how we use or managing your personal information when you engage with us under certain circumstances. For example, you are required to accept terms and conditions when you become a CKC member. Those terms and conditions apply together with this Privacy Policy.

2.0 How Do We Collect Personal Information?

We limit the collection of personal information to what is reasonably required to fulfill the purposes for which it was collected. We collect personal information in a variety of ways, including: directly from you; indirectly such as when a breeder provides a dog owner's information; and when you are interacting with us on-line.

Ensuring the security of the information we collect is one of CKC's top priorities. See How Do We Protect and Store Personal Information for more details. For example, if you register for a CKC Portal account, you will be creating a password for access, but your password is encrypted and is not accessible to CKC. If you provide your credit card details on a paper form, that sensitive data is redacted before the form is uploaded to our system.

We collect personal information in the following ways:

Directly From You:
You may provide personal information to us on the phone or via email. We also directly collect personal information from you through on-line applications and fill-in forms found on our websites.

When you voluntarily share information about yourself with us, whether in-person or on-line, we will collect that information in order to respond to your inquiry, set up an appointment, open your account, consider your application, register you for an event or for any other purpose disclosed to you at that time.

From Other Sources:
We may receive personal information from other sources or if the law requires or permits us to do so, or if we have your consent to do so.

It is the responsibility of those who provide us with information about you to comply with applicable laws and obtain any necessary consents. Similarly, if you provide us with personal information about another person, it is your responsibility to obtain consent from such person, for example, if you are a breeder and you provide information about a new dog owner or in a transfer of ownership context.

From Technologies Used On-Site and On-Line:
We may collect personal information through various types of technologies such as video surveillance used for security purposes, to protect against theft and to prevent damage to our offices.

Through our Websites:
We may collect certain types of information electronically when you interact with our websites (e.g. by completing on-line forms), email, social media accounts, or through the use of our or a third party's technologies, which include cookies, web beacons, single pixel gifs and other technologies. This information helps us understand what actions you take and allow our sites and portals to work correctly.

We may combine this information with other information collected about your existing or previous relationship with us, which can help us gain insights about your interests and preferences. We do this to better understand our member and customer base, and to provide you with more tailored advertising and marketing communications. This includes serving interest-based advertising to you, subject to your right to withdraw consent.

The technologies we may use include:

- Cookies, which are small text files that are saved on your computer when you visit a website so that information can be saved between visits, such as your previous searches for resources. Visit our On-line and Digital Cookie Notice for more information.

- Web beacons, and single pixel gifs, which are small image files that have information about you, such as your IP address, that can be downloaded when you visit a website or open an email. This allows us to understand your on-line behaviour, monitor our email delivery, and provide you with interest-based advertising. These tools also allow our third-party tracking tools to gather information, such as your IP address, and provide this back to us in an anonymized, aggregate form (i.e. in a manner that prevents us from identifying you personally).

- Data clean rooms, which are secure environments where de-identified personal information from one or more sources can be processed in accordance with defined rules and restrictions for analytics, measurement, data transformation or other purposes in a privacy-compliant manner.

- Other technologies, such as data management platforms, ad servers, reporting tools and analytics engines, which pull usage data from multiple sources and help manage and collect this data to use for personalization, interest-based advertising, customizing content and other methods to gain insights into our program users' needs and preferences.

You may delete or disable many of these technologies at any time via your browser. To learn more about the privacy choices available to you, please visit How Do I Change My Privacy Choices?

3.0 How Do We Use Personal Information?

We use your personal information to provide you with our services, to manage our operations, to communicate offers and information we think might interest you, to enhance your member or customer experience with us, and as permitted or required by law.

We use your personal information for the following purposes:

A. Providing you with CKC's Services

We use your personal information for purposes that include:

- Understanding your needs and responding to inquiries or requests for information;
- Verifying your identity and the information that you or a third party provides to us;
- Establishing, maintaining and managing our relationship with you, as well as determining your eligibility and suitability for programs offered by or on behalf of CKC;
- Setting up your account or registering you for an event/program to enable your participation;
- Providing you with appropriate levels of service;
- Facilitating the reunion of lost animals with their owners through our CANADACHIP Pet Recovery Program;
- Conducting polls and surveys; and
- For other reasonable purposes to which you consent.

B. Managing our Offerings and Organizational Risks

We use your personal information for many business reasons, which include:

- Protecting the legal interests of CKC and its members;
- Deploying and managing our information technology applications and systems, including managing our websites and databases/systems;
- Facilitating the use of our websites, which may include using cookies and other similar technology;
- Assessing and managing risk, including detecting and preventing conflicts;
- Monitoring and investigating incidents; and
- Meeting our legal and regulatory obligations, such as those under the Animal Pedigree Act for registering purebred dogs.

C. Communicating with You

We use your personal information to communicate with you for a variety of reasons, such as:

- Providing support, reminding you of upcoming appointments or events, as well as communicating about updates to services, or other CKC news;
- Taking or verifying instructions from you;
- Informing you of urgent matters, for example a data security concern that requires your attention;
- Informing you in a variety of ways (e.g., email, telephone, SMS, direct mail) about programs, products, services, special offers, promotions or events that may be of interest to you; and
- Delivering interest-based advertisements that may be of interest to you.

D. Conducting Market Research

We may use your personal information in order to conduct market research by tracking and analyzing current or previously collected information to improve or to develop new offerings, and to better understand our members and customers. When doing so, we generally will use your information in an aggregated format or with direct personal identifiers removed.

The information we use for market research may include, for example, website activities (e.g. your searches for resources, user location), and e-blast performance (e.g. opt-out requests, email bounce backs, click-throughs, and interaction with CKC on social media).

E. Conducting Data Analytics

We may use your personal information in order to conduct data analytics or research for business purposes. Wherever possible, we use aggregated, anonymized or de-identified information and minimize the risk of re-identification. For more information see How Do We Protect and Store Personal Information.

Types of analytics and research we may perform include:
- Managing events and operations (e.g., analyzing and improving our costs);
- Improving our products and services;
- Understanding members' or customers' needs and preferences and customizing how we tailor and market our services based on individuals' needs and interests; and

- Measuring the effectiveness of our offerings marketing.

F. Automated Decision Making

Automated decisions are defined as decisions about individuals that are based solely on the automated processing of personal information and that produce legal effects that significantly affect the individuals involved. In most cases, these tools assist, but do not replace, human judgment in making a decision. If automated decisions are made by CKC, we will inform you, and affected persons will be given an opportunity to express their views on the automated decision in question and object to it.

4.0 How Do We Share Personal Information?

We may share your personal information with our service providers (companies operating on our behalf) and other third parties (partners who provide programs, products or services) for the purposes described in this Policy and in accordance with applicable law. Additionally, if you authorize us to share information with a third party, we may do so as necessary and in connection with your relationship to us.

Categories of third parties and service providers with whom we may share personal information include:

- Volunteers assisting CKC in fulfilling its mandate, such as those assisting at events, our Board of Directors and council/committee members;
- Board member candidates (sharing of member voting lists);
- Data, software and IT infrastructure service providers;
- Hosting and data storage service providers;
- Market research firms for purposes of data analytics and conducting surveys;
- Marketing and direct advertising partners who provide information about products and services that may be of interest to you; and
- Web site developers, credit card processors, newsletter service providers and other such providers of administrative assistance.

There are circumstances where a disclosure without consent is justified or permitted, for example in the context of a legal investigation or a request from government or law enforcement authorities, or where CKC believes, upon reasonable grounds, that the disclosure is necessary to protect the rights or safety of an identifiable person or group.

We will not share your personal information outside of CKC, except as indicated below.

A. Service Providers

In the course of providing programs, products, services, promotions and events hosted, sponsored or advertised by CKC, we may share personal information with our service providers. These service providers help us operate our business, technology systems and applications, internal procedures, infrastructure, advertising, marketing, printing, shipping, risk mitigation, and analytics capabilities as well as assist us with meeting our legal and regulatory obligations. They provide services to us such as

data and website hosting, e-mail deployment, credit card processing, marketing, sales and processing or analysis of personal information. We require these service providers to limit their access to and/or use of personal information to what is required to provide their services and to comply with our privacy requirements.

B. Third Parties

In the course of providing certain of our programs, products and services, we may do so through arrangements with third parties. As a result, your personal information may be collected, used and shared by us to the applicable third party, for example event organizers who CKC may be promoting or sponsoring. We may also share personal information with partners who provide products or services to dog owners. In such cases we will only share the limited information they need. For example, a puppy buyer's name, email address, phone number, postal code, the puppy's go-home date and CKC membership number (if applicable), would be shared with Trupanion if a breeder is setting up a puppy buyer's medical pet insurance. These third parties may have their own privacy policies and terms and conditions, which will govern their use of your personal information. You should review the relevant privacy policies that apply when providing them with your information.

C. Publicly Available Information

There are contexts where a dog owner's limited information is made publicly available by CKC. For example, the CKC Executive Director's Disciplinary Report will list dog owner names and provinces in the Kennel and Bench magazine when there is an alleged offence related to non-delivery of certificates of registration. Dog owner information will also appear in the Stud Book available to all members. Key contact information is also available on CKC's website as part of the CANADACHIP Pet Recovery Program for lost dogs. There may be contexts in which consent to publication can be withdrawn. Contact CKC's Privacy Officer to find out more.

D. Sale or Transfer of Business or Other Transaction

We may decide to sell or transfer all or part of our business to a related company or to a third party, to merge with another entity, to insure or securitize our assets, or to engage in another form of corporate or financing transaction (including the proceedings of insolvency or bankruptcy), corporate reorganization, share sale, or other change in corporate control. If your personal information is required in connection with any such business transactions, we will comply with the legal requirements for the disclosure of personal information.

E. Other Permitted Reasons

Canadian law permits or requires the use, sharing, or disclosure of personal information without consent in specific circumstances. These circumstances include situations where use, sharing, or disclosure is necessary to protect CKC, our employees, our customers, or others (e.g., when investigating and preventing suspected or actual illegal activities, including fraud, or to assist government and law enforcement agencies). If this happens, we will not share more personal information than is reasonably required to fulfill that particular purpose.

E. With your Consent

Other than the purposes listed above, we may, with your implied or express consent, share or disclose your personal information outside of CKC, in accordance with applicable law.

5.0 How Do We Manage Consent?

Unless otherwise permitted or required by law, CKC shall not use or disclose personal information for any new purpose that is not outlined in this Policy without first identifying and documenting the new purpose and obtaining the consent of the individual. In some cases, your consent may be "implied" i.e. your permission is assumed based on your action or inaction at the point of collection, use or sharing of your personal information.

An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. For example, you are always given the ability to opt-out of receiving promotional electronic messages from CKC by using the available "unsubscribe" link. CKC will inform members and customers of the implications of withdrawing consent, as we may be limited or unable to provide information, products or services as a result.

We will obtain consent when we want to use personal information for a new purpose or for a purpose other than those stated at the time of collection in this Policy or in the terms and conditions of a specific program, product, service, promotion or event you signed up for, participated in or purchased.

Your consent can be withdrawn at any time, except in limited circumstances, including where withdrawal of consent is restricted by legal or regulatory requirements or as a result of your contractual obligations with us. For information on how to manage your privacy preferences, please see How Do I Change My Privacy Choices?

Example:

- Your birthdate must be collected when you apply for CKC membership since members must be at least 19 years old to vote in a referendum. Also, to determine if a member is eligible to a Life Membership, a member must be at least 50 years old, in accordance with CKC's by-laws. Only if a member choose to no longer renew their membership, can consent be withdrawn to the retention of one's birthdate, as collected at the time of obtaining membership.

If you choose not to provide us with certain personal information or if you withdraw your consent, where such withdrawal is available, we may not be able to offer you the programs, products, services, promotions, events or information that you requested or that could be offered to you.

6.0 How Do I Change My Privacy Choices?

We want you to clearly understand your choices and make informed decisions about your privacy options. There are several options available for you to manage your privacy preferences, including, for example: contacting us directly; changing your browser settings on your device; and/or, where available, using third party unsubscribe functionality.

A. When you Register or By Contacting Us Directly

You may opt-in to receiving email or SMS marketing communications at the time that you become a member or register for our programs, products, or services, enter our promotions or any time thereafter

when you interact with us. You may opt-out of:
- Receiving email or SMS marketing communications from CKC, by clicking “unsubscribe” within any marketing email you receive or texting “STOP” within any SMS marketing you receive;
- Receiving surveys by following the unsubscribe instructions provided in the email; or
- Receiving interest-based advertisements or other communications form us.

Please note that even if you have opted out of receiving marketing communications from us, we may still contact you for transactional purposes, in compliance with applicable laws (e.g. for membership renewal or to inform you about a security incident or other risk). We may also need to contact you with questions about an event that you are hosting and that is published on CKC’s website, or to confirm details about a registration form you have submitted to CKC.

C. Changing your Browser Settings on your Device

We use technologies to enhance your customer experience and present offers to you. For example, technologies such as cookies allow us to recognize when you use or return to our websites, providing you with a more seamless experience. You may delete or disable certain of these technologies at any time via your browser. However, if you do so, you may not be able to use some of the features of our websites.

Please refer to your browser instructions or help screen to learn more about how to block, delete and manage cookies on your computer or mobile device.

D. Using the Unsubscribe Functionality

You can manage your privacy preferences with respect to bulk messages by using the unsubscribe link contained in all our communications. Any interest-based advertising you receive from one of CKC’s sponsors can also be opted out of from their specific platforms. We also may embed links to other sites, including social media websites, on our websites. For more information about social media plug-in protocols, such as “Like” buttons on Twitter, Facebook or Instagram and their impact on your privacy rights, please visit the appropriate social media help centre (e.g., Facebook’s Help Center at https://www.facebook.com/help/).

7.0 How Do We Protect and Store Personal Information?

We take the security of your personal information very seriously and are committed to protecting your privacy by using a combination of administrative, physical, and technical safeguards. These measures include detailed security policies, multi-factor authentication, masking, encryption, logging and monitoring, as described below. We store your personal information for as long as it is necessary to provide you with our programs, products, and services and for a reasonable time thereafter, or as permitted or required by law.

Whenever possible, we refrain from collecting sensitive personal information. For example, if you are purchasing a product or service on one of CKC’s websites, you will be re-directed to CKC’s payment gateway provider to enter your credit card details and have your transaction securely processed. The payment gateway provider’s server acts as a link between CKC and CKC’s bank. CKC does not store any payment card information on its systems.

CKC strives to provide you with the most secure transmission environment possible. To secure the transfer of personal information, CKC has obtained a Secure Socket Layer (SSL) Server

Certificate. The certificate is used for any fill-in forms on the site, such as when you register for an event or contact us with a question. Information entered here is collected within a secure page, such that it is encrypted while being transferred to CKC's secure server.

In addition, we recommend that you do your part in protecting yourself from unauthorized access to your CKC Portal account. CKC is not liable for any unauthorized access to your personal information that is beyond our control.

The security of your personal information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

A. How we Protect Your Personal Information

To protect your personal information, we maintain administrative, technical, and physical safeguards in our properties, offices, and information storage facilities. By implementing these safeguards, we aim to avoid the loss, misuse, unauthorized access, disclosure, or modification of your personal information that we hold. These safeguards also apply when we dispose of or destroy your personal information. Examples of safeguards we may use, where appropriate, include but are not limited to:

Series of Authentication Questions, for example when a member requests a change to their information;

Secure Transfer Protocols, where sharing of personal information with service providers or partners occurs with industry best practice security controls to avoid data leakage;

Multi-Factor Authentication, which is a method of confirming your identity by using more than one way to authenticate you, such as asking for your password and a code that is sent to your email address or phone number;

Masking, which is the process of obscuring your information so that the structure remains the same, but the content is no longer identifiable;

De-identification, including pseudonymization techniques that replace, remove or transform your information with a pseudonym (e.g., replacing identifiers with codes) to preserve its informational value;

Anonymization, which is the process of altering your data so that it can no longer be used to identify you personally;

Encryption, which is the process of obscuring your information in order to make it unreadable without the use of a code or a key (for example when we create a secure channel between your browser and our servers to protect your information at rest and in transit;

Logging and monitoring, which is the process of tracking, recording, and monitoring activity related to the access and/or use of your personal information; and

For **paper records**, security card access to premises, locked cabinets and secure shredding practices are all enforced.

B. Data Governance

We maintain policies and practices which ensure the protection of your personal information. Depending on the volume and sensitivity of the information, the purposes for which it is used and the

format in which it is stored, we implement a combination of measures to protect your personal information, including:

- Internal policies and procedures that govern our privacy and information handling practices, including responding to privacy complaints or inquiries, investigating potential incidents and records management;

- Designated a Privacy Officer to monitor our companies' compliance with applicable laws;

- Employee privacy and security awareness raising;

- Contractual protections and other measures to ensure that sponsors, partners and service providers with whom we share personal information maintain adequate privacy protections and standards, as described above and in How Do We Share Personal Information?; and

- Regular review of privacy compliance initiatives.

C. Where we Keep Personal Information

We use all reasonable safeguards, including contractual requirements with our service providers, to protect your personal information wherever it is used or stored. In general, we store, access, and use personal information in Canada. When we engage a service provider that operates outside of your province or Canada, personal information may be stored, processed, accessed, or used in a foreign jurisdiction. In that case, the personal information is subject to the law of the jurisdiction in which it is used or stored, including any law permitting or requiring disclosure of the information to the government, government agencies, courts, and law enforcement in that jurisdiction. The jurisdictions where our service providers are currently storing personal information include data centres in the United States.

D. How Long We Keep Personal Information

We will store your personal information for as long as necessary to fulfill the purposes for which it was collected, except where otherwise required or permitted by law. Once no longer required, your personal information will be securely destroyed or anonymized (so the information no longer identifies you). Transitory data is kept for a very short period of time. For example, paper forms containing credit card details are only retained for 60 days and then shredded.

Please note that if your personal information is collected by a third party, it will be retained in accordance with the privacy policies and records retention requirements of that third party.

8.0 What Are Your Rights in Relation to Your Personal Information?

Under Canadian privacy laws, you have the right to request access to, and correction of, and deletion of the personal information we hold about you, or make a complaint, subject to any legal restrictions. Upon your request, CKC will also inform you of how your personal information has been or is being used, and who your personal information has been shared with.

With respect to written requests for access to your personal information, we will respond to your request within 30 days, unless an extension of time is required. However, there may be contexts where access is refused or only partial information is provided, for example, in the

context of an on-going investigation or where another individual's personal information or identity must be protected.

Depending on the jurisdictions in which you reside, you may be entitled to other data subject rights. To exercise any of your rights with respect to your personal information, please contact privacy@ckc.ca and provide sufficient details regarding the province in which you reside to enable us to fulfill your request. We may also need to verify your identity to protect your privacy. If there is a reason that we can't fulfill your request, you will be informed of that reason.

If you are not satisfied with a response from CKC with respect to your privacy concerns or our response to data subject rights you have exercised, you have a right to contact the appropriate privacy regulator.

You can request access or correction, deletion, request a review of certain automated decisions, or make a privacy complaint by contacting our Privacy Office, through email or postal address (for contact information, see Who Do I Contact with Privacy Questions?). If the Privacy Office is unable to address your concern to your satisfaction, you may bring the matter to the attention of the appropriate Privacy Commissioner. Our activities are subject to the jurisdiction of the Office of the Privacy Commissioner of Canada or the Information and Privacy Commissioner of your province or territory of residence.

9.0 How Do I Know if there are Changes to the Privacy Policy?

We may make changes to this Policy from time to time. Any changes we make will become effective when we post a modified version of the Policy on this webpage. If we make any material changes to the policy, we will post a notice on our websites or notify you directly. By continuing to participate in our programs, and/or use our services or purchase our products after being notified of such changes, you are accepting the changes to the Policy, subject to any additional requirements which may apply. If you do not agree to the changes in our Policy, it is your responsibility to stop participating in our programs and contact CKC. It is your obligation to ensure that you read, understand, and agree to the latest version of this Privacy Policy. The "Effective Date" at the top of this page indicates when it was last updated.

10.0 Who Do I Contact with Privacy Questions?

We have appointed a dedicated Privacy Officer who is responsible for overseeing our privacy program and ensuring compliance with applicable privacy laws and regulations. If you have any questions about how we handle your personal information, please contact us. If you are participating in an event that is offered by us with a third party, the third party may hold your personal information. If you have any questions or concerns, we will direct you to the appropriate party so that you may make enquiries as to that party's privacy policies and practices.

For all privacy related questions, contact our Privacy Office:

Privacy Officer

The Canadian Kennel Club
5397 Eglinton Ave. W.
Suite 101
Etobicoke, ON
M9C 5K6
E-mail: privacy@ckc.ca

Note that general email is not secure since it passes through many points on its route from you to us. If you are using general email to communicate with us, we strongly recommend that you do not include sensitive personal information, such as credit card numbers, within the email as we cannot guarantee its confidentiality enroute to us.