

MEC'S WEBSITE PRIVACY POLICY

Effective October 30, 2020

Scroll to the end of this page to see a record of changes to this Privacy Policy.

This Website Privacy Policy explains how MEC Mountain Equipment Company Ltd. collects, uses, keeps safe and discloses Personal Information and the choices you have with respect to the information Mountain Equipment Company collects, uses and discloses during your online experience via our website www.mec.ca and its subdomains (collectively the “Sites”) and the mobile device application (referred to as the “App”). Our privacy practices are based on and compliant with British Columbia’s Personal Information Protection Act (PIPA), and Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA), and the ten internationally recognized privacy principles.

In this Policy, when we say “we”, “us” and “our”, we are referring to MEC Mountain Equipment Company Ltd. (also referred to as “MEC”). When we say “customer” we are referring to an individual who has made a purchase or otherwise made a commercial interaction with MEC. When we say “you”, “user” or “individual(s)”, we are referring to the person accessing our Sites and App (non-customer or customer).

In this Policy, “Personal Information” means information about an identifiable individual such as name, email address, residential address and telephone number. Personal Information also encompasses more sensitive information such as gender, age, health status, family information, and any other data assigned to an individual.

If you are accessing our Sites or App from the European Union, a separate policy is under review and will be available soon.

For additional information about our privacy practices when handling customer-specific Personal Information that is not collected by our Sites, please contact our Privacy Officer.

Accountability

MEC’s Privacy Officer is responsible for the creation, oversight and implementation of our privacy management program and procedures to protect Personal Information, for receiving your privacy-related questions, and for providing you with information about our privacy practices.

You can contact our Privacy Officer at:

Mountain Equipment Company – Privacy Officer
Suite 101 – 887 Great Northern Way
Vancouver, BC V5T 4T5
Canada
Tel: (604) 707-3300
Email: privacy@mec.ca

Limited collection and use of personal information

MEC collects, uses, and discloses Personal Information for the following purposes:

- To provide retail services and process customer purchases;
- To verify a customer identity;
- To enable MEC to deliver a high standard of service to our customers and prospective customers;
- To understand the product and service needs of our customers and prospective customers;
- To develop and manage products and services to meet the needs of our customers and – perspective customers;
- To contact individuals directly for products, content and services that may be of interest;
- To register individuals, on request, in MEC-sponsored activities such as MEC Events, and MEC equipment rentals;
- To allow individuals to use our in-store and online technologies;
- To administer and fulfill contest and other promotions;
- To meet regulatory requirements; and
- To deliver regionally relevant user content.

We will collect only the minimum amount of information that is required to meet these purposes; however, we also provide you with the voluntary option of sharing additional information (e.g. your geographical location, your product reviews etc.) to enhance your and others' experience with our Sites or App.

More specifically, MEC collects and uses the following information:

All individuals (customer and non-customer)

Email address:

When you register for a user account, and/or subscribe to our email newsletter, we collect your email address. Your email will be used for account generation, and it will also be used to contact you for the purposes of product information, service updates, and notifications relating to the Sites. In accordance with *Canada's Anti-Spam Legislation (S.C. 2010, c. 23)* (CASL) with your consent, your email address will also be used to provide you with information for promotional and marketing purposes. At any time, you can opt-out of most email communication from us by clicking on the unsubscribe link at the bottom of our emails, updating your subscription preferences in your online user account, or contacting our [Service Centre](#). We may still contact you for product safety updates.

In order to understand and improve the effectiveness of our email marketing efforts, when we send you a marketing email, we will collect information about whether you open the email, whether you access the link(s) provided and, if you do, what pages you visit on our Sites, and also what, if anything, you purchase.

When you register for an account or subscribe to our email newsletter, you will be required to acknowledge that you have read, understood and agree to comply with the Terms of Use and this Website Privacy Policy, as it may be amended from time to time, for as long as you continue to use our Sites or App. If you do not agree with the Terms of Use or this Website Privacy Policy, do not sign up for an account, subscribe to our emails, and/or use our Sites or App.

Live Chat function:

When you commence a “Live Chat” with MEC personnel, our third party platform will collect your name and you will have the option to submit your email address as well. You will be bound by our Website Privacy Policy and Terms of Use of the platform, which are provided for your review when you access the Live Chat system. MEC will use the information you provide during the Live Chat to respond to your requests and questions submitted through the Live Chat system and to make improvements to your experience when using our Sites or App.

Website feedback form:

When you submit feedback about our Sites or App via our “Website Feedback Form” and/or complete an online survey that we have circulated, our third-party platform will collect information about you including your expressed opinions and comments about your MEC experience. You will have the option to submit your email address as well. You will be bound by this Website Privacy Policy and Terms of Use of the platform, which are provided for your review when you access the Website Feedback Form and/or survey. MEC will use the information you provide to enhance user experiences and respond to feedback. We may follow up with you to request further information related to the feedback provided.

MEC Events:

When you register for an event hosted by MEC, we will collect information about you including your first and last name, address and contact information, MEC number (if applicable), email address and emergency contact information. You will also complete an event waiver. If the event has a fee associated with it, we will collect your credit card information to process the payment. Where an individual under 18 is registering for an event, we require a parent/guardian to complete the information and provide consent for collection of information on behalf of the minor. To ensure your safety during the event, we will provide your emergency contact information to the event’s First Aid Provider. Furthermore, in situations where your first and last name may be posted publicly (e.g. time results from a MEC Race Series), we will provide your first and last name to the provider overseeing race timing. If you would prefer to not have your name posted publicly, you may request an alias when registering by contacting our [Service Centre](#).

MEC equipment rentals:

When you reserve equipment rentals online, our third party platform will collect information about you to complete your rental reservation including your first and last name, email address, phone number and home address. To process your rental payment, your credit card information will be collected to process the payment. You will be bound by the third party’s vendor Privacy Policy and Terms of Use when submitting your rental requests.

Product ratings and review / Ask and Answer options:

When you submit a product review via the “Rating and Review” option on our Sites and App or “Ask and Answer” about the product, our third party platform will collect your email address, a nickname (that will be publicly displayed when your review or question is posted), and information about your experience with the product and/or questions about the product. Any

information or photos that you provide other than your email address will be posted publicly on our Sites and App and by submitting, you agree to the platform's Terms of Use. We will use this information to respond to your questions, and follow-up with any product concerns or issues and make improvements to your overall experience with MEC. However, we reserve our rights to exercise our discretion responding to all reviews and questions. If you have purchased a product from MEC, and have not opted out from receiving commercial electronic messages, you may also be contacted by us with the opportunity provide a response to questions posted in the "Ask and Answer" section, and your engagement in these opportunities is completely voluntary. Please note email collection in the "Rating and Review" and "Ask and Answer" options are not used for marketing purposes.

Aggregate site use information:

We record information about the pages viewed by all of individuals who access our Sites. This data includes internet protocol (IP) address, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, connection speed, read time, display time, and number of clicks. We use this data, in aggregate form, to compile statistics and reports for MEC's use, and to improve the online experience for all visitors. We may, on occasion, provide portions of this aggregate information to vendors, consultants, potential advertisers, or news agencies. Typical uses of the data in this fashion would be to improve site functionality and evaluate the effectiveness of marketing initiatives.

Your physical location:

To provide you with location-based services, we may collect, use and share the physical location of your device by, for example, using satellite, cell phone tower or wi-fi signals. We may use your device's physical location to provide you with personalized location-based services and content. Some location-based services offered by MEC, such as the "Store Locator" feature and location-based Push Notifications, require your Personal Information for the feature to work. You will be permitted to allow or deny such uses, but if you do deny them, we may not be able to provide you with a personalized user experience.

Mobile device:

If you use a mobile device to access the Sites or download the App, we may collect device information (such as your mobile device ID, model and manufacturer), operating system and version information, IP address and geolocation information. Where you have downloaded the App to your mobile device, push notifications will be sent only to users who have chosen to opt into receiving such notifications. At any time, mobile application users can opt out by disabling Push Notifications within their device settings or by disabling specific notification topics from within the App.

Cookies, web beacons, pixel tags:

A cookie is a small text file stored on a user's hard drive. Cookies are required to make purchases on our Sites and App. We also use cookies to assist with site traffic analysis, which includes tracking the time/date of visits, pages viewed, and referring URLs. We may use cookies to serve our remarketing campaigns so that third party vendors, which could include platforms like Google and Facebook, show our ads on sites across the Internet. We may also use web beacons or pixel tags to compile tracking information reports regarding website user demographics, website traffic patterns, and website purchases. None of the tracking information in these reports can be connected to the identities or other Personal Information of individual users. For our own research purposes, we may link tracking information with Personal Information provided by individuals who access the Sites and App. Once such a link is

made, all of the linked information is treated as Personal Information and will be used and disclosed only in accordance with this Privacy Policy.

Tracking and analytics:

MEC may use certain third-party analytics and/or ad serving services that also use cookies to monitor system usage, server and software performance, to improve system design, to create benchmarks and to conduct trending analyses. The providers of these services may independently collect, use, and disclose your IP address together with information about your visits to this and other websites that they service in accordance with their own privacy policies (and not this privacy policy). These third-party services may use their own cookies and other data collection technologies. They may use your browsing behaviour in order to improve your experience, to gain a view of how people are using websites that they service so that improvements can be made, and as otherwise permitted in their privacy policies. MEC may also use targeted advertising service providers to tailor MEC advertisements to your preferences. These advertisements may appear on MEC's website or social media sites, or on third party sites. If you do not consent to 3rd party analytics, please do not use our Sites or App. If you have opted in to receive email news or offers, MEC may use your email address to target advertising to you. You may opt out of MEC email advertising by clicking the unsubscribe link at the bottom of our emails, updating your subscription preferences in your online user account, or contacting our [Service Centre](#).

Cached data:

When you use our Sites and App, some data is cached in the memory of your device. Cached data is encrypted and kept on the device as long as you are logged in, even if the Sites or App is put in the background. The data is deleted from the device when you sign out of the Sites and App and does not remain on the device.

Additional customer-specific information

Customer information:

When you create an online account to purchase products through our Sites and App, you can store credit card information and your billing address in your account. Your credit card information will be stored as tokenized information and will be only available to you and for your use when purchasing products.

Processing of customer purchases from our sites:

When customers purchase an item from our Sites, we only request the information needed to complete the processing of orders and billing, which includes your shipping and billing address, telephone number, credit card and debit card details.

Your payment will be processed by an authorized third-party platform and shipping information will be shared with shipping companies that fulfill the shipment of your order on behalf of MEC. As noted above, to expediate your purchases, in your user account, you may choose to save your preferred shipping and billing address, and payment card details.

Disclosure of information

Disclosure of information by MEC:

MEC will not disclose Personal Information for purposes other than the purposes identified in this Privacy Policy or for purposes that we expressly identify to you at the time we seek to

collect your personal information. We do not sell, rent or disclose your Personal Information to any third party without your consent unless disclosure without your consent is required or authorized by law.

For example, under certain circumstances, MEC will disclose your Personal Information without first obtaining your consent to:

- **Legal authorities:** when we are required or authorized by law to cooperate with local, national or international law enforcement or other authorities for the reporting of and/or investigation of improper or unlawful activities, at the request of a third party, or if we believe disclosure is reasonable to comply with court orders, protect individual's health and safety, or protect MEC's rights and property.
- **Trusted third parties:** when the services we are providing to you require us to provide your information to a third party who performs functions on our behalf. Your information will be treated with the same level of privacy and security as we are committed to providing as an organization and will not be used for other purposes than that which we authorize.

Disclosure of information by you:

By you: You may disclose information when you post content to our websites, in-store technologies or other public forums, such as our brands' social media pages, blogs, and online product reviews. Any information that you disclose through these services will become publicly available.

Social sharing: when you use certain aspects of MEC's website or other services, or you post information to other social networking sites (e.g. posting a link to MEC's Facebook or Twitter pages, or "liking" a product on your Facebook or Instagram account, or "pinning" a product on your Pinterest account), the Personal Information that you post or share in connection with these third party sites is visible to other persons and can be read, collected, used and disclosed by other persons. Any information provided to such third-party social networking sites and other sites is outside of MEC's control and is not governed by this Privacy Policy.

Collection of debt: Where it is necessary to establish or collect amounts owed to us.

Retention of information

At any time and without penalty, you can close your MEC online account by sending an e-mail to our Service Centre at info@mec.ca. If you would like to update or remove specific pieces of information you have saved within your account you can update them yourself by logging into your account (e.g. saved credit cards, billing address, etc.).

If you wish to have any of your information removed from our databases, or if you no longer want us to send any further communications to you, you can adjust your email settings through your online account or you can send an e-mail to our Service Centre at info@mec.ca. Where your information is stored with our third parties, we will proceed as necessary to remove your information as requested. If you decide you no longer want us to send you further communications, we may still contact you for product safety reasons.

If you are a part of MEC's voluntary membership program and have purchased products through MEC, we will retain a copy of your purchase history to ensure the appropriate enforcement of our "Rocksolid Guarantee" unless otherwise requested. If, however, you

request that we delete your purchase history this may negatively impact our ability to honour this guarantee.

Consent

MEC takes a consent-based approach to the collection, use and disclosure of Personal Information. Subject to situations where consent is not legally required, we identify the purpose(s) for which we are collecting your Personal Information at or before the time we collect it. Depending on the nature and sensitivity of the Personal Information we collect, we will do one of the following: (1) obtain your express consent to the collection; (2) imply your consent to the collection from the fact that you have chosen to supply your Personal Information to us; or (3) consider that you have consented to the collection unless you have chosen to opt-out of providing consent where we have made an opt-out option available.

International operations and data transfers

Unless there is a legal or regulatory requirement to store, access and/or use Personal Information in Canada, we may use third party platforms located outside of Canada to process and/or store Personal Information for us. Please note that Personal Information in the custody of these third party platforms may be subject to access by the law enforcement authorities of those jurisdictions in which the third parties are located.

Our Privacy Officer can provide further information about our policies and practices regarding third party platforms located outside of Canada and further information about how they collect, use, disclose or store Personal Information on MEC's behalf.

Our in-store wi-fi network

MEC provides in-store wi-fi that you can choose to connect to when you are visiting our storefronts. You will be required to agree to our Wi-fi Terms of Use when they are made available to you.

Accuracy

MEC relies on you to ensure that the Personal Information you provide to us while using the Sites and App is as accurate, complete and up to date as necessary for the purposes for which it is to be used. You are welcome to make changes, request deletion or correction to Personal Information previously provided to MEC can be up updated online at www.mec.ca/update, or by calling our Service Centre at 1-800-474-7704 (Canada and U.S.) or (604) 876-6221 (Local and International).

Safeguards

MEC uses administrative, technical and physical safeguards to protect your Personal Information against loss, theft, and unauthorized access, use, disclosure, copying, modification, disposal, or destruction in accordance with applicable legal requirements and industry standards. For example, we implement encryption and security controls to protect against unauthorized access to Personal Information during electronic transmission and require third parties acting on our behalf to maintain reasonable and appropriate safeguards.

We will review and update our security policies and controls as technology changes to ensure ongoing security of your information, however, please bear in mind that no internet or email

transmission is ever fully secure or error free and no security system is impenetrable. We cannot fully guarantee the confidentiality of any information that you share with us.

Openness

MEC makes clear and transparent notice of our privacy practices publicly available via this Website Privacy Policy and via the notifications that we provide to you at the time that we collect your Personal Information directly from you. You are also welcome to contact our Privacy Officer (see Accountability section above for contact information) to seek additional information about our privacy policies and practices.

Individual access

At any time, you can review, edit or request removal of information you have provided to MEC within the requirements as outlined in *Retention of Information* above. Upon written request, addressed to the MEC Privacy Office, MEC will also provide you with a list of entities to whom we have disclosed your Personal information.

Additional features and information

It is important to guard your privacy when you are online. If our Sites and App contain links to other websites, those websites are not governed by this Privacy Policy. Whether we have posted those links or other organizations, or individuals have posted those links, you should read their privacy policies and make an informed decision about whether you want to use those websites or their services.

Where MEC has enabled you to connect with other third-party platforms in order to utilize their services in conjunction with our Sites and App, you will be subject to their collection practices and the terms of use and privacy policies of those third-party platforms. You are responsible for reviewing and agreeing to those privacy policies, and terms and conditions. If you do not agree with the third-party terms of use or privacy policies, you should not use the services offered by such third-party service providers.

Children's privacy

MEC recognizes that children's privacy should be treated differently and values the involvement of parents and/or guardians in the protection of children's Personal Information and privacy rights online. As such, MEC does not actively market its services, App or Sites to individuals who are below the age of 13.

MEC careers

If you submit an application for a job opportunity via the MEC Careers website, you will be required to create an account on our third-party platform to facilitate the submission and processing of your application and provide consent for the collection of your information. You will be bound by the third-party platform's Privacy Policy and Terms of Use, along with MEC's Privacy Policy when handling information for recruitment purposes. The information you provide during the recruiting process will only be used and retained to consider your qualifications for employment and access to that information will be limited to employees at MEC who need it to assess if the role and you are a good fit.

Changes to this Privacy Policy

We may update this Policy to reflect changes to our information practices. We will post any changes to this page and, if the changes are significant, we will provide a more prominent notice such as notification via email. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to periodically review our Privacy Policy for the latest information on our privacy practices and to contact us if you have any questions or concerns.

Challenging compliance

MEC's Privacy Officer is responsible for receiving your privacy-related questions. You may send us your privacy-related questions or challenge our compliance with our Privacy Policy by submitting your concern to:

Mountain Equipment Company – Privacy Officer
Suite 101 – 887 Great Northern Way
Vancouver, BC V5T 4T5
Canada
Tel: 604-707-3300
Email: privacy@mec.ca

Office of the Information and Privacy Commissioner of British Columbia

947 Fort Street
Victoria, BC V8V 3K3
Tel: (250) 387-5629

October 30, 2020: Key updates include:

On October 30, 2020, substantially all of the assets Mountain Equipment Co-operative were sold to a Canadian affiliate of Kingswood Capital Management LP. Updates to this Privacy Policy include revisions to reflect this sale, as well as the fact that MEC is no longer operating as a co-operative and does not collect or hold data relating to membership in a co-operative.

To see previous versions of the Privacy Policy and Terms of Use, view:

[MEC Website Privacy Policy \(pre-October 2020\) \(pdf\)](#)

[MEC Website Terms of Use \(pre-October 2020\) \(pdf\)](#)

[MEC Website Privacy Policy \(pre-November 2019\) \(pdf\)](#)

[MEC Terms of Use \(pre-November 2019\) \(pdf\)](#)

[MEC Website Privacy Policy \(pre-April 2016\) \(pdf\)](#)

