

PRIVACY POLICY

1. Overview

This Privacy Policy describes the manner in which the Ottawa Sports and Entertainment Group (OSEG) family of companies, including, without limitation, Lansdowne Stadium Limited Partnership (o/a TD Place), Ottawa REDBLACKS Football Club, Ottawa 67's Hockey Club, Lansdowne Retail Limited Partnership (o/a "Shops at Lansdowne"), Lansdowne Master Limited Partnership, and OSEG Foundation (collectively, "OSEG," "we," "our," "us"), collect, use and disclose Personal Information that is collected or received through our interactions with you and through certain OSEG products, services, events, programs, websites and applications (collectively, our "**Services**").

By using any of our Services, you consent to OSEG's collection, use and disclosure of your Personal Information as described in this **Privacy Policy** (the "**Privacy Policy**").

Please note this Privacy Policy does not apply to products, services, events and programs (whether accessed through an OSEG entity or not) that display or provide an authorized link to an alternative privacy policy, which may include, by example products, services, events and programs available at:

www.ottawaredblacks.com

www.cfl.ca

www.chl.ca

2. Changes to the Privacy Policy

This Privacy Policy may be updated at times to reflect changes in our privacy practices. Any such changes will be posted on this page and where required, notified to you when you start use of a Service for the first time following the change. Changes will take effect immediately upon such posting or notification and will apply to all collected information obtained by OSEG after such posting or notification. We encourage you to review this Privacy Policy periodically. By your continued use of our Services, you acknowledge that any revised Privacy Policy will supersede any prior privacy policies to which you and your information may have been subject and constitutes your acceptance of such modifications.

3. Personal Information We May Collect

When you interact with us through our Services, we may collect data, including Personal Information from you or from other sources. "**Personal Information**" is information about an individual from which that person can be identified.

Data that we collect may be information that you directly provide to us, such as Personal Information you provide when you use our Services, or information that is passively or

automatically collected from you, such as information collected from your browser or device.

The data we collect primarily includes:

- **Data that you provide directly when you register for, or use, the Services.** This data will vary, but typically consists of name, email address, postal address, phone number and other similar contact data. We also receive data from the communications you send to us, such as customer service inquiries, product reviews and other feedback regarding the Services.
- **User credentials**, such as username, password, password hints and similar security information used to create an account and authenticate users of the Services.
- **Demographic data**, such as age, gender, country and language preference.
- **Payment data**, such as credit card information and billing address.
- **Device data**, such as type of device, operating system and other software installed on the device, device settings, IP address, device identifiers and error reports.
- **Usage data**, such as the programs and features you access, items you purchase, and the timing, frequency and duration of your interactions through the Services.
- **Location data**, such as IP addresses transmitted from your device.
- **Information about your interests and preferences**, such as your favorite events, clubs, artists or athletes, your home city or your communications preferences. In addition to what you provide directly, we may infer your interests and preferences from other data we collect, such as the content and advertisements you interact with while using the Services.
- **Third-party integrations.** If you connect your use of the Services through a third-party service (e.g., a social media platform), the third-party may share certain information from your third-party account with us.
- **Other third-party data**, such as data from our affiliates, partners or vendors, data brokers or public sources. For example, if a third-party runs a contest, they might share information about the people who entered the contest in accordance with their own privacy notices. We also might receive Personal Information from online ticket websites in accordance with their own privacy notices and/or through agreements with such online ticket websites, so we can see who has bought tickets to which game.

4. How OSEG May Use Personal Information

Please be advised that OSEG may use Personal Information for the following purposes. In respect of EU citizens, we will only use your Personal Information where we have a legal basis for doing so. The relevant legal bases that we rely on in respect of our processing of your Personal Information on our website, apps and in connection with the Services are described in Section 11 of this Privacy Policy and are listed below in relation to each purpose.

OSEG may use Personal Information to provide Services. We use the data we collect or receive to provide you with the Services you use or request. For example, we use this information to:

- Create accounts;
- Process transactions;
- Provide technical support and respond to user inquiries;
- Store Personal Information and keep records of our processing activities;
- Comply with legal obligations that apply to us in connection with the provision of our websites, apps and Services;
- Administer your participation in our events, contests, sweepstakes, games, or promotions;
- Notify you about updates to our Services or send other communications that are relevant to your use of our Services; and
- Protect you and us by enhancing our ability to detect and prevent fraud and potentially illegal activities in connection with our Services and otherwise enforce our rights.
- If you are in an EU Member State, your Personal Information will be processed for this purpose under the lawful bases of:
 - Performance of a contract;
 - Legitimate interests; and/or
 - Compliance with a legal obligation.

OSEG may use the data we collect and receive to improve our operation and Services.

We also use the data we collect or receive to provide content you may find relevant and interesting and to maintain and upgrade our operations and our Services. For example, we may use this information to:

- Solicit, process, review and make use of input and feedback;
- Identify and address technical issues on our Services; and
- Customize your experiences based on location information or your online activities, including the content you view, the products you bid on or purchase, other Services of ours you use, and other information we collect or receive.
- If you are in an EU Member State, your Personal Information will be processed for this purpose under the lawful basis of:
 - Legitimate interests.

OSEG may use the data we collect and receive to provide effective advertising and marketing. We also use the data we collect and receive to send you promotional communications. For example, we may use this information:

- To send you electronic and other marketing messages about our Services, our venues, sponsors, our community and charitable endeavors, or other third-party business partners that may be tailored to your preferences and interests – for example, content related to your favorite artist or club.
- To conduct analytical and/or market research to enable us to improve the goods and services we offer.

- To help our business and advertising partners understand the effectiveness of their advertising and marketing campaigns and to compare the performance of those campaigns to ads displayed on other websites and apps.
- If you are in an EU Member State, your Personal Information will be processed for this purpose under the lawful bases of:
- Consent, where we send you direct marketing (except where we are marketing our own products and/or services which are similar to those in which you have previously purchased from us and several further conditions are met); and/or
- Legitimate interests for all other marketing.

OSEG may use the data we collect and receive to anonymize you. We may take your Personal Information and anonymize it, after which we may use it and share it for our analytics services (for instance, to find out the types of people who use certain Services), and to provide insights for ourselves and third-parties.

If you are in an EU Member State, your Personal Information will be processed for this purpose under the lawful basis of:

- Legitimate interests.

OSEG may use the data we collect and receive to protect you, ourselves and others. We may use your Personal Information to protect you, ourselves, and others by enhancing our ability to detect, prevent, or otherwise address fraud, illegal activities, security or technical issues, or to protect against harm to the rights, property, or safety of OSEG, its customers, users, business partners, or the public, or otherwise enforce our rights.

OSEG may also use the data we collect and receive for other purposes that will be described to you at the point of collection or for which you provide your consent or as permitted or required by applicable law.

5. How OSEG May Share Personal Information

We may share information that we collect or receive, in Personal Information, with third-parties as described below:

OSEG may share the data we collect and receive with our affiliates. We may share information with current and future affiliates, including our parent and subsidiary companies, joint venture partners, registered charities operated by us or other companies we control, are controlled by, or with which we are under common control, and for clarity includes, without limitation, Lansdowne Stadium Limited Partnership (o/a TD Place), Ottawa REDBLACKS Football Club, Ottawa 67's Hockey Club, Lansdowne Retail Limited Partnership (o/a "Shops at Lansdowne"), Lansdowne Master Limited Partnership, and the OSEG Foundation.

OSEG may share the data we collect and receive with our service providers. We sometimes engage or partner with other companies – such as content providers, retail and other companies, advertising providers, audience-measurement companies, social networking services, customer service providers, and mobile location analytics providers – to operate the Services or perform certain functions on our behalf, for example, hosting our Services, storing our data, maintaining our fan database, delivering messages and advertising, operating our websites and digital platforms, processing payments and orders, and administering our contests and sweepstakes. From time to time, we may provide information about you to these companies, including access to your Personal Information as needed for them to perform these functions. To operate certain Services, we may also share information about you with such third-parties, their service providers, successors and permitted assigns, and affiliates in connection with the operation and delivery of our Services. Where a service provider processes Personal Information on our behalf, we require it to use the information only as necessary to provide services to us and to protect it appropriately. Certain third-party services may operate independently of OSEG and, in those circumstances, their own privacy policies may also apply.

OSEG may share the data we collect and receive with our business partners. We may share information about you with other select business partners that are not service providers, such as our sponsors, event promoters, facility licensees (including, without limitation, Atlético Ottawa, Ottawa BlackJacks, Ottawa Rapid FC, Carleton University, and the University of Ottawa), other retailers, broadcast partners, and other organizations that participate in, operate, promote or support events, activities or programs at our venues. These organizations may use such information for purposes including operating and administering events and programs, ticketing, customer service, fan engagement, marketing, analytics, and providing you with special offers, promotional materials, and other information that may be of interest to you. These other business partners are expected to protect the confidentiality, integrity, and security of any information we share with them. However, when you agree to share your information in this way, we are not responsible for the privacy practices of our business partners, which may use your information for their own purposes.

OSEG may share the data we collect and receive with our leagues. We may share information about you with the leagues, governing bodies and sanctioning organizations with which an OSEG entity, facility licensee, event or program may be affiliated, including, without limitation, the Canadian Football League, the Canadian Hockey League, the Ontario Hockey League, the Canadian Premier League, the Canadian Elite Basketball League, the Northern Super League, National Sport Organizations, U SPORTS, Ontario University Athletics. These organizations may use this information for purposes including administering and promoting their events, competitions and programs; providing you with special offers, promotional materials, and other information that may be relevant to you; improving their products and services; and performing internal analysis. Where required by applicable law, we will seek your consent before sharing your information with these organizations for promotional purposes. Please note that the websites and services of these

organizations are not controlled by OSEG and are subject to their own privacy policies, and OSEG is not responsible for their privacy practices.

OSEG may share the data we collect and receive with other parties in connection with certain prospective or completed business transactions. In the event that the ownership of OSEG (or any portion of our assets) becomes part of a potential business transaction or changes as a result of a business transaction (for instance, a merger, acquisition, financing, corporate reorganization, or insolvency event), your information may be transferred to another entity for review in connection with a potential business transaction or to complete a business transaction. If such a transaction is completed, you will be notified in an update to this Privacy Policy or through another appropriate means.

OSEG may share the data we collect and receive when you participate in games and contests. We may share information with third-parties in connection with the administration or marketing of games or promotional contests connected to our Services. This might include, for example, names of the winners of a contest or in connection with a game leaderboard.

OSEG may share the data we collect and receive when you post publicly. We may share information with third-parties when you post information to a public user profile or a public area of our Services. If you post information to these interactive features, it may be publicly available, and you may receive unsolicited messages from other parties. We cannot ensure that parties who have access to such information will respect your privacy.

OSEG may share the data we collect and receive when necessary under certain circumstances. We may disclose your Personal Information to, for instance, law enforcement agencies and other public authorities or private entities, when we have reasonable grounds to believe that disclosure is necessary to:

- Comply with applicable law or respond to valid legal process;
- Protect the safety and security of individual(s), our venues, or our Services;
- Prevent fraud, abuse or other unlawful or unauthorized activities; and
- Protect the rights or property of us or third-parties, including enforcing the terms of our agreements.

We may also share your data for any other purpose as disclosed to you at the time of collection, or when we have obtained valid consent. Please note that this Privacy Policy is not intended to limit our ability to share or disclose aggregated, pseudonymized or anonymized data in a manner that accords with applicable privacy law.

6. Cookies

Our Services may use online technologies called “cookies”. This section explains what these technologies are and how they may be used.

What are cookies? Cookies are small text files which are stored on the browser or hard drive of your computer or mobile device when you visit a webpage or application. A “session cookie” stores temporary information that is deleted when you close your web browser or turn off your computer or device. A “persistent cookie” enables the site to recognize when you return to it and remains stored on your computer until you delete it. These cookies work to make your experience browsing our site as smooth as possible by remembering your preferences the next time you visit the site. Cookies also allow us to improve our sites.

How does OSEG use cookies? The OSEG websites may use the following types of cookies:

- **Essential cookies** allow you to be able to experience the full functionality of our site. For example, these cookies make it easier to log-in to an OSEG account.
- **Performance cookies** tell us how you use our site and help us to improve it. For example, these cookies count the number of visitors to our website and see how visitors move around when they are using it. This helps us to improve the way our sites work, for example, by ensuring that users find what they are looking for easily. The information collected by these cookies is anonymous.
- **Customizer or functionality cookies** allow our sites to remember you and your preferences, helping to customize your experience on our site. Please note that the following third-parties may also use cookies, over which we have no control. These third-parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third-party cookies are likely to be analytical cookies or performance cookies or targeting cookies.

Cookie storage. Cookies may be retained for different periods depending on their purpose and the provider.

How do you change cookie preferences or block cookies? Within your browser, you can choose whether you wish to accept cookies or not. Different browsers make different controls available to you. Generally, your browser will offer you the choice to accept, refuse or delete cookies at all times, or those from providers that website owners use i.e. third-party cookies, or those from specific websites. Each browser’s website should contain instructions on how you can do this. If you do this, please be aware that you may lose some of the functionality of our websites.

Beacons. Our Services may also use online technologies called “beacons”. Beacons are small pieces of code placed on web pages, videos, and in emails that can communicate information about your browser and device to a server. Beacons can be used, among other things, to count the users who visit a web page or read an email, or to deliver a cookie to the browser of a user viewing a web page or email. These “beacons” should not be confused with “location beacons”, which are small devices in our venues or retail locations that enable alerts (such as a time-sensitive special offer) to be sent to your mobile device.

7. Security Safeguards for Personal Information

We have adopted administrative and technical measures to help protect against loss, misuse, interference, disclosure, destruction, alteration and unauthorized access to the data you provide to us. We also maintain reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete and current.

Please note that no data transmission or storage can be guaranteed to be 100% secure. Despite our efforts to ensure that unauthorized third-parties will not access or obtain your Personal Information, complete confidentiality and security cannot currently be guaranteed on the Internet. The provision of services and communications via the Internet are subject to a risk of interception, loss, or alteration. As a result, while we strive to protect your information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to the Services and cannot be responsible for the theft, destruction, or inadvertent disclosure of your information. By using our web services, you acknowledge and agree that we cannot be held responsible for damages resulting from the transmission of confidential information or Personal Information over the Internet and that such communications are at your own risk. This does not affect any liability we might have under the GDPR in respect of the Personal Information of EU citizens. In the event of a breach of security safeguards for Personal Information, OSEG and its business partners will comply with all reporting and notification obligations.

Please be advised that regardless of the geographic location from which you use our Services or provide Personal Information to us, your data may be transferred to, maintained in, and processed by OSEG, its service providers, and our business partners in Canada, the United States and elsewhere in the world. By using our Services or by providing us with your information, you consent to this collection, transfer, storage, and processing of information to, in, and out of Canada and the United States.

We will retain Personal Information only for as long as reasonably necessary for the purposes set out above or for as long as required by law. In some circumstances we will anonymise your Personal Information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. Your Access to Your Personal Information

We will give you access to Personal Information we retain about you in accordance with the provisions of the *Personal Information Protection and Electronic Documents Act* or other applicable law (EU citizens should see Section 11, below, which more fully describes their rights and California residents should see Section 12 with respect to their rights). We will make every reasonable effort to keep your Personal Information accurate and up-to-date. Upon your request, you shall be informed of the existence, and where possible, of the use and disclosure of your Personal Information. You may verify the accuracy and completeness of your Personal Information, and may request that it be amended, if appropriate. Simply send us an e-mail at privacyofficer@oseg.ca and we will look after your request.

9. Your Preferences

Withdraw. Subject to legal restrictions and reasonable notice, you may withdraw your consent for us to use your Personal Information at any time by contacting our privacy officer at privacyofficer@oseg.ca. Such withdrawal may affect your ability to use our Services, and could, in certain cases, prevent you from using one or more Services altogether.

Unsubscribe. You may opt out of receiving future promotional email communications from us by clicking the “Unsubscribe” link in the footer of promotional email communications and updating your preferences. You may also identify specific email publications about our teams and services which you would like to receive by visiting the applicable website. Please note that we may continue to send you transactional or service-related emails regarding your account. You may opt out of receiving promotional SMS messages (e.g. text messages) from us by replying “STOP” to any message, which is free of charge. Please note that we may respond to your opt-out request with a message confirming that you have successfully opted out.

Cookies. You can opt out of receiving certain cookies by adjusting your browser settings to refuse certain cookies or to alert you when a cookie is placed. Your browser settings may not permit you to block the use of certain non-cookie technologies, and those browser settings that block cookies may have no effect on such techniques.

Mobile Advertising Identifiers. These are unique strings provided by your mobile device’s operating system. They facilitate the delivery of targeted advertisements to your mobile device. For information on how to reset your advertising identifier and/or limit advertising tracking, please refer to the instructions for your mobile device’s operating system.

Location Services. If you use location-enabled Services or apps covered by this Privacy Policy, you may be provided with an opportunity to opt out of having your location information collected and/or used for certain purposes. For example, our use of “location beacons” allows us to offer time-sensitive special offers to you when you are near a concession stand or retail outlet. Location beacons are not enabled unless you turn on the Bluetooth setting on your device and opt in to receive signals from location beacons for our apps. However, if you disable location information, you may not be able to enjoy all of the functionalities offered by those Services or apps. You also may be able to limit the collection of your location information when you enable our apps or through changing the location service settings on your device or browser.

10. Privacy Policy for Children (Users Under 13 Years Old)

Our Services are not directed to, or intended for, children under 13 years of age. We may use age screening mechanisms to help us determine if a user is under the age of 13. However, if a parent or guardian of a child who is under 13 years of age discovers that Personal

Information of such child has been submitted to OSEG through the Services without the parent's or guardian's consent, OSEG will use commercially reasonable measures to remove such Personal Information from OSEG's servers at the parent's or guardian's request. To request the removal of such Personal Information, the parent or guardian must contact OSEG as set forth in Section 15, and provide all information requested by OSEG to assist it in identifying the Personal Information to be removed.

11. European Privacy Rights

This section of the Privacy Policy applies only if you use our Services covered by this Policy from a country that is a Member State of the European Union, (the "EU"), and supplements the provisions in this Privacy Policy.

Under the GDPR, you are entitled to additional rights, including: (i) the right to withdraw consent to processing where consent is the basis of processing; (ii) the right to access your Personal Information and certain other supplementary information; (iii) the right to object to certain types of processing, including processing based on Legitimate Interests or which is carried out for the purposes of direct marketing; (iv) the right to erasure of Personal Information about you, under certain conditions; (v) the right to demand that we restrict processing of your Personal Information, under certain conditions, if you believe we have exceeded the legitimate basis for processing, processing is no longer necessary, or believe your Personal Information is inaccurate; (vi) the right to data portability which means the ability to obtain and reuse your Personal Information for your own purposes across different services; (vii) the right to object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you, under certain conditions; (viii) the right to lodge a complaint with data protection authorities (https://edpb.europa.eu/about-edpb/board/members_en); (ix) the right to be informed with clear, transparent and easily understandable information about how we use your Personal Information and your rights (this is why we are providing you with the information in this Privacy Policy); and (x) the right to have your personal data corrected if it is inaccurate or incomplete. If you want to learn more about your rights under the GDPR, you can visit the European Commission's page on Data Protection at: https://commission.europa.eu/strategy-and-policy_en. In France, you are also entitled to provide us with your instructions as to the fate of your Personal Information after your death.

Legal bases for processing

The relevant legal bases for processing personal data for the purposes of GDPR are as follows:

Consent: means our processing of your personal data where you have signified your agreement by a statement or action for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want.

You can withdraw your consent at any time by contacting us. This will not affect any processing that is carried out before you withdraw your consent.

Legitimate interests: means our processing of your personal data where this is necessary for our legitimate interests or those of a third-party, except where these interests are overridden by your interests or fundamental rights and freedoms. In this case, our legitimate interests are those that we have in:

- operating our apps and websites;
- providing the Services;
- sending you electronic marketing communications in respect of the Services, including where these are similar to those in which you have previously requested from us;
- detecting and preventing fraud and other criminal offences;
- ensuring the quality of, and improving, the Services;
- administering your account(s);
- responding to your queries and requests;
- communicating with you;
- record keeping, statistical analysis, internal reporting and research purposes;
- ensuring network and information security;
- notifying you about changes to our services;
- investigating any complaint you make;
- providing evidence in any dispute or anticipated dispute between you and us;
- analysing how our apps and website are being used;
- customising various aspects of our apps and website to improve your experience;
- understanding the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- business and disaster recovery (e.g. creating back-ups);
- lawful document retention/storage purposes;
- database management; and
- protecting the rights, property, and/or safety of us, our personnel and others.

Necessary for compliance with a legal obligation: means our processing of your personal data where this is necessary for compliance with a legal obligation that applies to us.

Necessary in connection with a contract: means our processing of your personal data where this is necessary for the performance of a contract with you, or in order to take steps at your request before entering into a contract, for example to deliver the Services to you.

International transfers

OSEG (and each of its composite entities) is based outside of the European Economic Area (“EEA”) and so their collection and processing of your personal data may involve a transfer of information outside the EEA.

When transferring your personal data outside the EEA, we ensure that security measures and appropriate safeguards are put in place to protect the personal data and to ensure that all transfers comply with applicable data protection law.

OSEG (and each of its composite entities) are based in Canada, which means that due to an adequacy decision by the European Commission, any Personal Information outlined in this Privacy Policy is covered by laws that provide an adequate level of protection.

Where we share your Personal Information with service providers or business partners based in the USA, we will use an appropriate transfer mechanism where required by applicable data protection law, which may include the EU-U.S. Data Privacy Framework for participating organizations or other recognized safeguards. For further details see https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/eu-us-data-transfers_en.

12. California Residents' Rights

OSEG will, to the extent required by applicable California law, honour applicable rights relating to your Personal Information. These rights may include the right to know and access Personal Information we collect, use and disclose; request deletion; request correction; opt out of the sale or sharing of Personal Information; limit certain uses and disclosures of sensitive Personal Information; and exercise applicable privacy rights without unlawful discrimination. These rights are subject to applicable exceptions and limitations. To exercise an applicable right, please contact us as set forth in Section 15. We may take reasonable steps to verify your identity before responding to a request. Laws that apply to one category of individuals do not confer the same rights on individuals not covered by those laws.

13. Third-Party Links

Our Services may, from time to time, contain links to and from third-parties. Please note that these websites have their own privacy notices and that we do not accept any responsibility or liability for these notices or for any personal data that may be collected through these websites. Please check the privacy notices of these other websites before you submit any personal data to them.

14. If You Fail to Provide Personal Information

Where we need to collect Personal Information by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the Services). In this case, we may have to cancel the provision of the Service you have with us but we will notify you if this is the case at the time.

15. Contact Us

If you have any questions about this Privacy Policy or the privacy practices of the Services, please contact us by email at privacyofficer@oseg.ca or:

Ottawa Sports and Entertainment Group
1015 Bank Street
Ottawa, Ontario K1S 3W7
Attention: Privacy Officer
Tel: 613-232-6767

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