

## PRIVACY POLICY

### 1. COLLECTION OF INFORMATION

InTown's collection, use and disclosure of information are governed by the professional obligations mandated by the Law Society of Ontario, as well as any applicable privacy legislation. InTown, as a corporation providing legal services, institutes and maintains this Privacy Policy (the "**Policy**") in addition to any professional obligations of confidentiality, which legal professionals in the Province of Ontario are required to maintain.

### 2. CLIENT COMMUNICATION

Client communication and client information shared with InTown through email or through InTown's website (the "**Website**") are retained solely for the purposes of communication. This Policy defines "**Client Information**" as the information received by InTown from its Clients including but not limited to personal information. Client Information will not be shared with external entities, unless required by law to do so. Client email addresses may be used to send information about recent changes and developments in the law and on topics related to municipalities.

### 3. INFORMATION USE

InTown does not sell, loan, trade, barter or exchange or otherwise disclose any Client Information it has obtained with or to anyone outside of InTown, unless the disclosure is necessary to provide the services for which the company has been retained or as agreed by the Client in advance of the disclosure, including but not limited to InTown's disclosure to its agents.

### 4. RETENTION

The amount of time InTown will retain the Client Information varies, depending on the services provided and the nature of the Client Information in question. The retention period typically extends past the immediate Client relationship with InTown, but continues as long as is necessary for InTown to maintain sufficient information to respond to any issues that arise at a later date and as required by law. Once the Client Information is no longer needed, InTown will safely destroy, delete, purge, erase or otherwise dispose of the Client Information.

### 5. WEBSITE CONSENT

By using the Website, its visitors consent to the collection, use, storage, transmission and disclosure of personal information in accordance with this Policy. This Policy defines any user or visitor of the Website as a "**Visitor**".

### 6. THIRD PARTY WEBSITES

The Website may, from time to time, contain links to external third party websites ("**Third Party Websites**"). InTown is not responsible for the content, security, privacy practices of the Third Party Websites, nor any external links contained in the Third Party Websites.

## 7. WEBSITE STATISTICS

When visiting the Website, InTown and its service providers may collect the Visitor's IP address. InTown may record the length of the Website visits, the means used by the Visitor to arrive at the Website, the Visitor's location (according to IP address), the operating system used, the type of the Visitor's device (i.e. a phone, tablet, desktop) used to access the Website, and the types of media the Visitor views on the Website. InTown may collect anonymous statistics about how Visitors use the Website to improve the Visitors' experience and meet their needs. InTown may use this information to manage the Website, develop valuable knowledge publications, seminars and events and to ensure InTown keeps its technology upgraded to sufficiently meet Client needs.

## 8. COOKIES

InTown does not use cookies.

## 9. AMENDMENT TO THE POLICY

This Policy is effective as of September 15, 2019. InTown reserves the right to change this Policy, and any of the policies and procedures concerning its practices for handling of Client Information, including personal information, without prior notice. InTown will inform its Clients on the Website if the Policy is amended; any such changes will apply to the information collected as of the effective date of the amendment. The amended Privacy Policy will also apply to Client Information InTown holds prior to the effective date of the amendment.

## 10. QUESTIONS REGARDING THE POLICY

Should Clients have questions regarding the Policy and the company's practices surrounding the collection, use and disclosure of Client Information or complaints about how Client Information is handled, please email or contact InTown's Principal, Stefan Zhelev, using the information below:

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