

PRIVACY POLICY

Last Update: July 2021

It's important for Grandio Group (dba La Cage) and its group of companies (collectively, "**La Cage**", "**we**", "**us**" or "**our**") that you trust how we handle your personal information. This is why this Privacy Policy ("**Policy**") provides you with the information that you need to understand on how we access, collect, use, retain, disclose and share your personal information and how this personal information can be consulted and corrected when necessary.

Please review carefully this Policy. We used a question and answer format so that you can navigate this Policy easily.

If you have any questions regarding the processing of your personal information, do not hesitate to reach out to us, we are here to help! You can email us at privacy@clubcage.ca.

The person responsible for the protection of personal information at La Cage is identified below and can be reached by mail at the following address:

Grandio Group Attention :
Privacy Officer
102-1180 Place Nobel
Boucherville (Quebec) J4B 5L2
Canada

1. **When does this Policy apply and what does it cover?**

This Policy contains information about how we collect, use, retain, disclose and share your personal information when:

- you use our mobile application "Club Cage" (the "**App**");
- you navigate our public websites such as www.cage.ca and www.clubcage.ca (the "**Websites**" and together with the App, the "**Platforms**");
- you sign up and participate in our Club Cage rewards program, on any of our Platforms (the "**Program**"); and/or
- you exchange or interact with us by e-mail, social media or otherwise.

In this Policy, we use the term "**Services**" to refer to all of the above, and where there is no distinction to make between the different aspects of the Services.

This Policy also covers our use of tracking technologies such as cookies (as defined hereinafter) on our Services. For more information about what we mean by "cookies" and what we do with them when you use our Services, please [click here to jump directly to the relevant section of this Policy](#).

This Policy does not apply to third-party content accessible through the Services, or to the use of third-party apps, platforms or services that may be accessible from our Services or integrate with our Services, as applicable. These third parties collect, use and disclose personal information in accordance with their respective privacy policies. We invite you to review these policies carefully.

2. What types of personal information do we collect, and why?

We collect personal information to provide you with our Services, for the purpose of obtaining analytics on your use of our Services, or in connection with our marketing activities.

We consider that “personal information” means any information which allows us to identify you directly or indirectly, including “cookies” and other electronic data. Some information may not be personal on its own but may become personal information if associated with other information or if the sum of the information allows us to identify individuals. For more information regarding specifically the cookies that we use, please jump to [the next section of this Policy](#).

Below are listed the categories and types of personal information we may collect when you use our Services, and the reasons why we do so. If you provide La Cage personal information concerning other persons, you must first obtain those persons’ consent.

Category	Types	Explanations
Platforms		
Electronic data	IP address, mobile identifier, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons and language.	This information is collected automatically for our Platforms to function effectively, to fix bugs, or to improve the security of our Platforms. We also use this information for analytics purposes to help know more about your use of our different Platforms. These may be collected as part of cookies (click here for more information on cookies we use).
Usage data	Time spent on the Platforms, pages visited, links clicked, language preferences, pages that led or referred you to any of the Platforms.	We collect and use this information for analytics purposes to help know more about your use of our Platforms. These may be collected as part of cookies (click here for more information on cookies we use).

Contact data	Address, email address, , first and last names, phone number, language preference, other identification data, emails and messages content (and attachments).	If you communicate with us by email, on social media, through our “Contact” forms on our Websites, to send you our services-related news communications (subject to your specific consent), or by any other means, we collect the personal information that you share with us, such as your email address and the content of your communication.
Program		
Account data	First and last names, age, address, email address, language preference, gender, date of birth, favourite La Cage restaurant, special status such as employee status, credentials such as your password.	<p>We collect this information when you fill out any of our Program registration forms on our Platforms.</p> <p>We use this information to confirm you are old enough to be eligible to the Program, to register you with the Program, to organize and maintain different Program members’ accounts on our Platforms, to run the Program (such as by providing you with bonus points or other birthday offers on your birthday), to conduct marketing analysis and campaigns, and to provide you with secure access to the Program through our Platforms.</p>
Consent data	Opt-in consents obtained from you through our Platforms.	<p>We keep record of the consents and any opt-out we obtain from you, including those related to the practices described in this Policy, to our terms and conditions, to enable our collection of your geographic location data from your mobile device or web browser, to our use of certain third-party service providers and their own terms and privacy policies, to receive communications from us regarding our Program, Services, surveys or other services including the transactions you complete with us, whether by email, push notifications, SMS, etc.</p> <p>We use this information to ensure we have sufficient legal basis to collect, use and disclose your personal information as described in this Policy and, ultimately, to demonstrate our compliance with requirements under applicable law.</p>

<p>Program data</p>	<ul style="list-style-type: none"> - Your Program member ID, Program card and loyalty tier information; - Information on any and all orders and purchases made of our products and services including bookings made for any of our La Cage restaurants and other La Cage selling points and your visits therein, while you participate in our Program; - Accrued and redeemed points, bonus points and rewards information; - Location information; and - Sports team affiliation and other Program member profile optional information you decide to provide us with. 	<p>We collect and use this information to administer, and provide you with, the Program and related rewards and advantages, to identify attempts of fraud and errors and preventing and protecting ourselves and our users from same, and organizing promotional events or activities to which we may invite you.</p> <p>As your points (and ultimately, your rewards) accrue based on what purchases and orders you make with regard to our products and services, information regarding such purchases and orders are also collected and used for the purpose of running our Program.</p> <p>As part of our Program, we will also use your personal information (including without limitation your location data) to offer you rewards, exclusive offers and notify and otherwise communicate with you regarding such offers, subject to your specific consent to receive those notifications / communications.</p>
<p>Survey data</p>	<p>All information contained and/or deducted from your answers to our optional surveys available from the Program.</p>	<p>We collect and use this information to ensure that you are satisfied with our products and services, to follow-up with you if you are not, for other customer service purposes, to improve our Program, services and products and to conduct marketing analysis and campaigns.</p>
<p>Contest data</p>	<p>First and last names, email address, postal address, answers to eligibility question(s), answers to quizzes and other contest-related questions, etc.</p>	<p>We collect this information when you fill out any of our Contest registration forms on our Platforms.</p> <p>We use this information to confirm your eligibility to, administer and conduct, our promotional contests, to contact you if you have won a prize and to conduct marketing analysis and campaigns.</p>
<p>Contact data</p>	<p>Email address, phone number, device and web browser location information (subject to your specific consent), and</p>	<p>We collect and use this information to contact you regarding the Program (either by email, SMS or push notifications) and promotional offers, rewards or advantages based on your geographic location, and/or to contact the “friend” you referred to the</p>

	referred friends' personal information.	Program, the whole being subject to your/their specific consent(s).
Marketing and other communications		
Quiz data	Answers to quiz questions.	We may provide optional quizzes as part of our Services, in addition to our contest-related quizzes. If you do answer any of those quizzes, we will process your answers to the quiz questions to conduct marketing analysis and campaigns, and to send you personalized offers regarding our products and services, subject to your specific consent to receive such.
Social media data	Publicly available information on (or relating to) your social media accounts.	If you follow us or interact with our social media accounts, we may process your personal information for recruiting, marketing or advertising purposes, subject to applicable laws, including those on consent.

3. What about cookies and other tracking technologies?

Cookies are files that are installed on your computer, device, hard drive, or web browser in order to collect information such as your language of preference, browsing history and web browser type and version, all for the purpose of optimizing your experience when using our Services. In this Policy, when we refer to “cookies” we also include other technologies with similar purposes, such as pixels, tags and beacons.

We use cookies to compile aggregate data about site traffic and site interactions in order to continuously improve your experience with our Services and functionalities thereof. We may also use trusted third-party services that track this information on our behalf. Generally speaking, we use first and third-party, session and persistent cookies. The cookies set by us are called “first-party cookies” and the cookies set by our third-party partners and service providers are called “third-party cookies.”

- **Session cookies** are temporary cookies that remain on your device until you close your web browser. Many session cookies are essential to make our Website work correctly, as they typically enable you to move around our Website and use its different features.
- **Persistent cookies** remain on your device after you close your web browser or until you manually delete it (for the former, how long the cookie remains on your device will depend on the duration or “lifetime” of the specific cookie and your web browser settings). Persistent cookies help us recognize you as an existing user of our Services, so it is easier and convenient to return to, or to interact with, our Website without setting parameters once again (such as language preferences). In addition, persistent cookies also help us recognize you when you view a resource belonging to us from another website or app (such as an advertisement)

and help us record information about your web browsing habits during the lifetime of the persistent cookie.

Examples of cookies we use are listed below:

Category	Descriptions and explanations
Essential cookies	Essential cookies are required for the Websites to function as intended and that it is secured. For instance, essential cookies are used to ensure the functionality of a change from http to https, or to remember your cookie preference if you are prompted to accept or refuse certain cookies. We are not required to obtain your consent to use essential cookies.
Analytics cookies	Analytics cookies are used to monitor usage and performance. Analytics cookies we use include _ga and _gid (Google Analytics) , which are third-party cookies which help us identifying which sections of our Websites are the most popular, the origin of users, and other analytics to help us improve our Websites.
Performance cookies	Performance cookies we use include AWSELBCORS , for load balancing, in order to optimize our Websites. It also stores the information regarding which server cluster is serving you when you access our Websites.
Targeting cookies	Targeting cookies are used for marketing and profiling purposes, so that we can deliver ads that are more relevant to you, whether directly or through our providers. Targeting cookies we may use include fr and _fbp (Facebook) , which are third-party cookies we use to show relevant advertisements to the users and measure and improve the advertisements. This cookie also tracks the behaviour of users across websites that have Facebook pixel or Facebook social plug-in enabled.

For more information on cookies, you can refer to websites such as <http://www.cookiecentral.com/> and <https://www.allaboutcookies.org/>.

To know how you can manage your cookies preferences on your web browser, please [click here to jump to the section of this Policy that covers this topic.](#)

4. To or with whom do we disclose or share your personal information to, and why?

To be clear, we do not sell your personal information to data brokers. However, we do disclose and share your personal information with certain types of third parties to provide you with the Services, conduct marketing, and otherwise as permitted or required by applicable law. Those third parties may also collect your personal information on our behalf and disclose it to us for the same purposes, as the case may be.

We encourage you to review the privacy statements and policies of those third parties so that you can understand how they collect, use and disclose your personal information.

Category	Explanations
<p>Service providers</p>	<p>Service providers are retained by La Cage to provide you with some functionalities of our Services that are outsourced to third parties. We may need to disclose some of your personal information to those providers but only to the extent necessary for them to perform the services we retain them in order to, ultimately, provide you with our Services.</p> <p>Consequently, we may disclose your personal information to collect it through, or otherwise grant access to it to the following providers, to the extent necessary for the above purposes:</p> <ul style="list-style-type: none"> • Antavo to host your personal information and to administer and provide our Program and related points, advantages and rewards (click here to jump to their privacy policy); • Bloomreach (previously named Exponea) to establish and manage our relation and communications with you and other customers of La Cage (click here to jump to their privacy policy); • Mito for IT purposes and to ensure functionality of our App, such as to conduct secure management of accounts credentials and synchronization with your online purchases, orders and other activities through our other Platforms, for the purpose of running the Program (click here to jump to their privacy policy); • Posera (Maitre'D) to manage your purchases and orders regarding our products and Services that are made within our La Cage restaurants and other establishments, which are compiled to administer our Program (click here to jump to their privacy policy); • UEAT to manage and accept online orders for our products and Services, which are compiled to administer our Program (click here to jump to their privacy policy); • Bookenda (TouchBistro) to manage your bookings to our “La Cage” restaurants, which are compiled to administer our Program (click here to jump to their privacy policy); • Qualtrics to obtain analytics on your use of our Platforms and improve their functionalities (click here to jump to their privacy statement); and • Zendesk to manage and provide customer service and support for our Services (click here to jump to their privacy policy).
<p>Marketing partners</p>	<p>We use marketing partners to manage our leads and provide you with relevant marketing content. All of these activities require our marketing partners to access some of your personal information, including through cookies. Marketing partners we use include the following:</p> <ul style="list-style-type: none"> • Google Inc., through our use of Google Analytics as part of our analytics cookies (click here to jump to their privacy policy).

	<ul style="list-style-type: none"> • Facebook, Inc. through our use of Facebook Audience, Facebook Pixel and other Facebook cookies, as part of our targeting cookies (click here to jump to their privacy policy). • Instagram, Inc. if you connect your Instagram account with our Services, which may collect and share with us your social media data for analytics and marketing purposes (click here to jump to their privacy policy). <p>To learn more about our use of cookies when you use our Services, please click here. To know how to manage your settings with respect to cookies, please click here.</p>
<p>Law enforcement bodies and other competent governmental authorities</p>	<p>We may receive requests by authorities to access your personal information. We will validate that the request is licit before responding. When possible, we will advise you. We will only share what is strictly required.</p>

We may also share your personal information with our financial and legal advisors or auditors if reasonably required, or in the event we would be required to do so to defend our rights and interests.

In the case of a merger or acquisition, sale of assets, corporate reorganization, bankruptcy filing, insolvency procedures or similar circumstances, your personal information may also be transferred or we may have to share some of your personal information to conclude, negotiate or discuss with third parties such potential transactions. We will only share what we are required to share for these specific purposes.

5. Where do we store your personal information, how long do we retain it and how do we keep it secure?

Your personal information is stored on the servers of our trusted third-party service providers Bloomreach (previously named Exponea) and Antavo, which host such information in the United Kingdom and in the Netherlands. Your personal information may also be stored and processed in other countries in which we engage service providers. Consequently, by using our Services, you consent to the transfer of personal information to countries outside your country of residence which may have different data protection rules than in your country. While such information is outside of Canada, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

La Cage will retain your personal information for as long as necessary to provide its Services to you, or as required by applicable law, whichever is longer.

La Cage has implemented various physical, administrative, organizational, technical and technological safeguards designed to protect the confidentiality and security of personal information under our control, taking into account the sensitivity, amount, distribution and format of such information. Our hosting third-party provider Bloomreach [is GDPR conformity certified, and holds ISO 27017 & 27018 certifications](#) (to jump to their own security commitments, please [click here](#)), and Antavo uses Google Cloud for hosting, which has substantially similar certifications. However, **no method of transmission over the Internet, or method of electronic storage, is 100% secure.**

Within our organization, we take steps designed to ensure that only those members of our personnel who need access to your personal information to fulfil their employment duties will have access to it. When we disclose your personal information to service providers, we take reasonable measures to ensure that the rules set forth in this Policy are complied with.

6. Do you have any rights over your personal information?

Yes you do! However, these rights vary depending on where you are located.

In Canada, you generally have the right to **access** your personal information and to **rectify** it if inaccurate, in certain circumstances. On written request and subject to proof of identity, you may access the personal information that we hold, and ask that any necessary corrections be made, where applicable, as authorized or required by law.

However, to make sure that the personal information we maintain about you is accurate and up to date, please inform us immediately of any change in your personal information.

If you want to exercise your rights, please [contact us using the contact information provided at the beginning of this Policy](#). We should respond to your request within 30 days. If we can't comply with your request, we will tell you why.

If you are located in Quebec, please note that the Quebec *Commission d'accès à l'information* maintain [this web page](#) to provide you with forms to make requests. If you are not satisfied with how we handle your requests to exercise your rights over your personal information, you can also contact the *Commission d'accès à l'information* using the contact details provided on [their website](#).

7. Can you manage your cookie preferences?

Yes, you can! However, some functionalities may require cookies in order to perform as expected, or for security purposes. You can control your cookie preferences through your browser.

Depending on the browser that you are using, different instructions are applicable. Click on your browser for more information:

- [Google Chrome](#)
 - You can also browse on Incognito Mode while using Chrome.

- [Firefox](#)
- [Safari](#)
- [Microsoft Edge](#)
- [Opera](#)

Google also offers the possibility of opting out of all behavioural and remarketing advertisings. Please visit the [Google Privacy Center](#) to learn how to do so.

8. Can we change this Policy?

We will update this Policy from time to time to reflect changes to our practices, technology, legal requirements and other factors. Please check [the “Last Update” legend at the top of this page](#) to see when this Policy was last updated.

When changes are made to this Policy they will become immediately effective when published in an updated Policy posted on this page unless otherwise noted. Your use of our Services following these changes indicates your consent to the practices described in the updated version of this Policy.