# PRIVACY POLICY MODEL FOR SUN GRO RETAIL MOBILE APPLICATION

Created: February 26, 2016

This privacy policy governs your use of the software application Sun Gro Retail ("Application") for mobile devices that was created by Sun Gro Horticulture. The Application contains Sun Gro's product list for Black Gold®, Fafard®, Sunshine® and Sunshine® Advanced products. It also contains educational information such as ingredient charts, and explanations of what materials are commonly used for potting mixes. The App is resident on your mobile device and does not need a WiFi connection to be accessed.

## What information does the Application obtain and how is it used?

#### **User Provided Information**

There is no registration required with Sun Gro and we ask for no user-provided information.

## **Automatically Collected Information**

The Application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use the Application.

#### Does the Application collect precise real time location information of the device?

This Application does not collect precise information about the location of your mobile device.

## Do third parties see and/or have access to information obtained by the Application?

Only aggregated, anonymized data is periodically transmitted to external services to help us improve the Application and our service. We will share your information with third parties only in the ways that are described in this privacy statement.

We may disclose Automatically Collected Information:

- as required by law, such as to comply with a subpoena, or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- with our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement.

• if Sun Gro Horticulture is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via the App and/or a prominent notice on our Web site of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

#### What are my opt-out rights?

You can stop all collection of information by the Application easily by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

## **Data Retention Policy, Managing Your Information**

We will retain Automatically Collected information for up to 24 months and thereafter may store it in aggregate.

#### Security

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Application. Please be aware that, although we endeavor provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

## Changes

This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy here and informing you via a notification to your device. You are advised to consult this Privacy Policy regularly for any changes, as continued use is deemed approval of all changes.

#### **Your Consent**

By using the Application, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. "Processing," means using cookies on a computer/hand held device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information, all of which activities will take place in the United States or Canada. If you reside outside the United States or Canada your information will be transferred, processed and stored there under.

## **Contact us**

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at <a href="mailto:privacy@sungro.net">privacy@sungro.net</a>.