



# Privacy Policy

This Policy Statement has been prepared to affirm Mandarin's strong commitment to maintaining the privacy of its customers, franchisees (existing and potential), suppliers, and others and to inform these individuals of its practices concerning the collection, use and disclosure of personal information provided to Mandarin about any identifiable person excluding Mandarin's employees.

The purpose of this Policy Statement is to establish, in accordance with the Personal Information Protection and Electronic Documents Act (Canada), rules to govern the collection, use and disclosure of personal information in a manner that recognizes the right of privacy of individuals with respect to their personal information and the need of Mandarin to collect, use or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances.

## Accountability

Mandarin recognizes its responsibility for personal information under its control and has designated a Corporate Privacy Officer to oversee the collection, use and disclosure of personal information within the organization, and to ensure compliance with the Personal Information Protection and Electronic Document Act (Canada) and any other applicable provincial privacy legislation. Any questions, complaints or inquiries regarding its privacy policies and practices should be directed to the Corporate Privacy Officer at Mandarin Restaurant Franchise Corporation, 8 Clipper Court, Brampton, Ontario L6W 4T9 or [MandarinEatsInfo@mandarinrestaurant.com](mailto:MandarinEatsInfo@mandarinrestaurant.com).

## Purposes

If any personal information is collected, the purposes for such collection will be clearly identified by Mandarin before or at the time the information is gathered.

In general, personal information is collected voluntarily from our customers, franchisees and suppliers for the following purposes:

1. To identify and address demands and needs of customers of Mandarin, and to develop product offerings to suit customer preferences.
2. To provide notice of and facilitate operation of promotional and advertising campaigns including promotional contests, sweepstakes or promotions.
3. To create awareness of Mandarin's products and services that may be of interest to customers.
4. To respond to specific inquiries from Mandarin's customers.
5. To review and assess applications by individuals for franchise opportunities.
6. To manage and promote Mandarin's franchise operations.
7. To identify and address demands and needs of franchisees.
8. To comply with legal and regulatory requirements.

If personal information has been collected, and is to be used for a purpose not previously identified, Mandarin will identify the new purpose before the information is used. Unless the new purpose is required by law, the consent of the individual will be obtained prior to use of the information.

### **Consent**

Before the collection, use and disclosure of personal information, Mandarin will make a reasonable effort to ensure that the individual is advised of the purposes for which the information will be used and to obtain the consent of the individual. However, consent will not be required where inappropriate in the circumstances including, without limitation, in the case of a compromise to the availability or accuracy of the information being collected, used and disclosed as part of an investigation into the breach of an agreement or a contravention of law, an emergency that threatens the life, health or security of a person, or as required by law. Consent may be express or implied, except that notice to receive e-newsletters will be express.

Mandarin will not, as a condition of the supply of a product or service, require an individual to consent to the collection, use, or disclosure of personal information beyond that required to fulfil the explicitly specified purpose(s).

An individual will always have the opportunity to "unsubscribe" from receiving e-mail or other communications at any time, subject to legal or contractual restrictions and reasonable notice to Mandarin. Mandarin will inform the individual of the implications of such withdrawal. Withdrawal of consent to receive e-newsletters will occur within ten business days.

### **Limiting Collection**

The collection of personal information will be limited to that which is necessary for the purposes identified by Mandarin.

### **Limiting Use, Disclosure and Retention**

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes.

### **Accuracy**

Personal information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is used.

### **Safeguards**

Mandarin will take such steps as are necessary to establish and implement security safeguards to protect the personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

The nature of the safeguards will vary depending upon the sensitivity of the information that has been collected, the amount, distribution and format of the information, and the method of storage. More sensitive information will be safeguarded at a higher level of protection.

Mandarin will make their employees aware of the importance of maintaining the confidentiality of personal information. All third parties that obtain personal information from us (e.g. service providers that perform functions on our behalf) are contractually required to protect your confidentiality and personal information in a manner consistent with this policy, and/or as required by law.

Mandarin will take reasonable care in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.

### **Openness**

Mandarin will make readily available to individuals specific information about its policies and practices relating to the management of personal information.

### **Individual Access**

Upon written request, an individual will be informed of the existence, use, and disclosure of his or her personal information and will be given access to that information. However, in certain situations, Mandarin may not be able to provide access to all the personal information it holds about an individual including, without limitation:

- information that is prohibitively costly to provide;
- information that contains references to other individuals;
- information that cannot be disclosed for legal, security, or commercial proprietary reasons; and
- information that is subject to solicitor-client or litigation privilege.

An individual may be required to provide sufficient information to permit an organization to provide an account of the existence, use and disclosure of personal information.

Mandarin will respond to an individual's request within a reasonable time period not later than 30 days, unless extended in accordance with applicable law. Mandarin's response will be at minimal or no cost to the individual.

### **Challenging Compliance**

An individual will be able to address a challenge concerning compliance with this Privacy Policy with Mandarin's Corporate Privacy Officer. Mandarin will inform individuals who make inquiries or lodge complaints of the existence of relevant complaint procedures. All complaints will be investigated, and if a complaint is found to be justified, Mandarin will take appropriate measures, including, if necessary, amending its policies and practices.

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change or replace this Privacy Policy at our sole discretion at any time. Please check back from time to time to ensure that you are aware of any updates or changes in this Privacy Policy. We will indicate at the top of this page the date this Privacy Policy was last revised. Your continued access or use of this website after any such changes constitutes your acceptance of the Privacy Policy as revised.