

# **Privacy Policy**

Last updated: October 29, 2024

Welcome to Blue Castle Ventures LTD ("BCV," "we," "us," or "our"). Protecting your privacy is very important to us. This Privacy Policy outlines how BCV collects, uses, and protects your personal information within our members-only Platform at www.bluecastleventures.ca (the "Platform").

This Privacy Policy applies exclusively to members of the **BCV Club**, a membership-based organization that provides access to specific services and benefits, none of which constitute securities, investments, or financial instruments. By using our Platform, you consent to our privacy practices as described in this policy.

#### 1. Information We Collect

### a) Personal Information

To process membership and ensure a secure and personalized experience, we collect the following types of personal information when you register for the Platform or participate in membership activities:

- Contact Information: Including name, email address, mailing address, and phone number.
- **Identification Information:** For compliance with legal requirements, including proof of identity.
- Payment Information: Necessary for processing membership payments and rewards disbursement.

# b) Usage Data

We collect information about your interactions with our Platform, including IP address, device information, browser type, and pages visited. This data helps us monitor Platform performance and improve user experience.

# c) Transaction Information

We may collect details related to your transactions on the Platform, including membership purchases, member benefits, and activity logs.



#### 2. How We Use Your Information

BCV collects and uses your information exclusively for purposes related to the management and operation of the BCV Club. Uses include:

- **Membership Management:** to process applications, verify identities, and manage accounts.
- **Benefit Distribution:** to ensure members receive applicable benefits in accordance with membership agreements.
- Communication: to provide members with important updates, respond to inquiries, and notify members of any changes in our services or policies.
- **Security and Compliance:** to detect, prevent, and address any fraudulent or unauthorized activities and comply with applicable laws.
- **Improvement of Services:** we use aggregated usage data to understand Platform usage patterns and improve user experience.

BCV will not sell, rent, or lease your personal information to any third parties. All information shared with our business partners is limited to specific purposes that serve our membership and operations and is subject to confidentiality agreements.

# 3. Sharing Your Information

We may share your information in the following situations:

- **Service Providers:** we work with third-party service providers who assist us with our services, including payment processing, Platform hosting, and data analytics. These providers are subject to strict confidentiality obligations.
- **Legal Obligations:** BCV may disclose personal information to comply with applicable laws, legal processes, or governmental requests when required by law.
- **Protection of Rights:** We may share information to protect the rights, safety, and property of BCV, our members, and employees in cases where terms of service are violated.

# 4. Security of Your Information

The security of your personal information is paramount. We employ industry-standard physical, electronic, and administrative measures to safeguard information against unauthorized access and use. However, no internet transmission is entirely secure, and we cannot guarantee complete security. By using the Platform, you acknowledge this limitation and agree that BCV will not be liable for security breaches caused by events beyond our control



#### 5. Your Privacy Rights

You may request to access, correct, or delete your personal information under applicable data protection laws. To exercise these rights, please contact us at info@bluecastleventures.ca. We will respond to requests within the timeframes set by applicable laws. Please note that deleting certain information may affect your access to membership benefits.

#### 6. Cookies and Tracking Technologies

Our Platform uses cookies and similar tracking technologies to enhance user experience and gather usage data. You may disable cookies in your browser settings, although this may impact your access to some Platform features.

### 7. Member Conduct and Privacy

We take our commitment to member privacy and respect seriously. In accordance with our **Terms of Use**:

- **Respectful Interactions:** Members are required to maintain respectful interactions with BCV employees. Rude or abusive conduct may result in disciplinary actions, including wallet freezes or membership suspension.
- Social Media Comments: Members are expected to refrain from making disparaging comments about BCV on social media. Persistent violations will lead to fines or membership termination, as specified in the Customer Conduct Policy.

By joining BCV, you agree to uphold these standards and respect our community and staff.

# 8. Retention of Information

We retain personal information only as long as necessary for the purposes described in this Privacy Policy and to comply with applicable legal, tax, and regulatory obligations. Upon the termination of your membership or upon request, we will securely delete or anonymize your personal information, except where retention is required by law.



#### 9. Geographic Restrictions and Data Transfers

BCV is headquartered in Manitoba, Canada, and primarily operates within Canadian and U.S. jurisdictions. If you access our Platform from outside Canada or the U.S., you acknowledge that your information may be transferred, processed, and stored in these jurisdictions, which may have different data protection laws than your home country.

### 10. Children's Privacy

Our Platform is intended for adults 18 years or older. BCV does not knowingly collect or store personal information from children. If we become aware that we have collected information from a minor without parental consent, we will promptly delete that information.

### 11. Changes to This Privacy Policy

BCV may update this Privacy Policy to reflect changes in our data practices, legal requirements, or membership policies. Any updates will be posted on this page, and significant changes will be communicated to members via email or Platform notifications. Continued use of the Platform following such updates constitutes acceptance of the changes.

#### 12. Contact Us

For questions, concerns, or requests related to this Privacy Policy or your personal information, please contact us at:

# **Blue Castle Ventures LTD**

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