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Grey House Publishing Canada's CASL Statement of Intent

Starting July 1, 2014, anti-spam legislation passed by the Canadian government will go into effect. The laws outlined in Canada's Anti-Spam Legislation (CASL) bill C-28 will be enforced starting July 1, 2017. CASL is a set of laws that have been put in place to protect Canadians from unwanted electronic communications in an effort to create a safer online environment for Canadian citizens.

For more information and full details of the legislation please visit the <u>CASL website</u>.

Grey House Publishing Canada will continue to keep the needs and preferences of our customers at the forefront of our practices and will comply with all laws and regulations outlined in CASL, including fulfilling all requirements for consent, identification and unsubscribe features. We follow these regulations in our editorial practices, as well as in the creation of our marketing campaigns, including commercial electronic messages (CEMs). Grey House Publishing Canada takes full responsibility for tracking of all express and implied consent.

Here are some key facts on how we comply with CASL by gathering and using contact information including email addresses to publish in our databases:

- Our team of editors use a variety of means to collect contact information for our directory publications—online research, questionnaires, telephone calls and/or fax communications.
- Emails sent to gather contact information and update the listing of that organization in our publications is not considered a CEM.
- We do not use software to scrape the web and electronically gather or harvest contact information.
- Email addresses listed on an organization's respective website(s) constitutes implied consent, unless otherwise specified.
- Completed questionnaires by an organization (either electronically or via fax) fall under express consent as they have provided the information to be included in our publication(s).
- We do not publish personal contact information of an individual unless that information is the same as and is intended for business use.

How and who uses our publications:

- Our publications are used for research, communication or marketing purposes.
- Customers who use our publications for research and communication purposes include academic institutions, public libraries and government organizations.
- Business-to-business customers of Grey House Publishing also use our publications for research and/or marketing purposes to promote their product or service that is relevant to an organization listed in our databases, which constitutes implied consent.

How we comply with CASL as it relates to our list services:

- CASL does not prohibit the legitimate collection and compiling of lists of email addresses, provided the activity follows the rules regarding consent in the legislation and other principles that apply within federal and provincial privacy laws. For more information about Personal Information Protection and Electronic Documents Act (PIPEDIA) laws and regulations, please visit the government website.
- Grey House Publishing Canada does not collect personal email addresses unless that information is the same as is intended for business use.
- We will only sell or rent email addresses listed in our databases that have provided express consent to do so, as it relates to our list services.

Here are some key facts about how we comply with CASL with respect to our marketing practices to our customers and relevant prospects in a business-to-business environment.

- Grey House Publishing Canada will always clearly explain the purpose of our CEMs.
- We will continue to provide customers who are currently subscribed to our CEMs and any future customers with the three necessary items of information:
 - 1. we will contact only those who we have consent to contact, implied or express.
 - 2. we will identify ourselves with our address and contact information.
 - 3. we will provide customers with the ability to unsubscribe from our emails at any time.
- We are moving towards the ability for our customers to manage their own preferences for receiving different types of email communications in future.
- We do not sell our customer contact information.
- We do not send CEMs to personal email addresses unless they are our customers and are using the same email address for business purposes.
- We will continue to send CEMs to organizations, institutions and agencies where there is an implied consent and who have not opted out or managed their email preferences as to not receive future CEMs. Implied consent in a business-to-business environment is given when "the electronic messages are relevant to the recipient's business, role, function or duties, and the electronic address has been conspicuously published or disclosed, without a statement that the person does not wish to receive unsolicited commercial electronic messages."

Grey House Publishing Canada is making every effort possible to confirm express consent with our customers before July 1, 2014 when CASL is put into effect. The company we use to execute our CEMs is Constant Contact and they are currently updating their system so our customers can manage their own email preferences.

Please read our <u>privacy statement</u> if you have any questions about the contact information we have on file.

In the meantime, please continue to contact us if you would like to change your preferences, or you can fill out this <u>automatic form</u>.

For all other inquiries about Grey House Publishing's CASL statement of intent, please contact Bryon Moore, General Manager.