

Privacy Policy

Last Updated: November 14, 2018

RealTerm Energy Corp., the owners of MyTown (“the Application”), believes in the personal right to privacy, and is respectful of your rights in this regard. MyTown will only collect information vital to the functionality of the Application and some basic analytics information to allow us to continue to improve the Application.

- Once you sign in to a municipality, your unique device ID is sent to the MyTown server so that update notifications and municipality notifications can be delivered to you. You can disable these notifications at any time using the settings page accessible via the "Gear" icon in the top right-hand corner of the MyTown Dashboard.
- The different tiles available in the Application may collect various pieces of information that will be sent to the municipality upon request of the user. Among the types of personal data that this Application collects, by itself or through third parties, includes: first name, last name, gender, phone number, address, country, state, county, email address, ZIP/Postal code, city, usage data, camera permission, precise location permission (continuous), precise location permission (non-continuous), approximate location permission (continuous), approximate location permission (non-continuous), geographic position, password and picture.
- Complete details on each type of personal data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the data collection.
- Personal data may be freely provided by the user, or, in case of usage data, collected automatically when using this Application.
- RealTerm Energy takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the data. The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to RealTerm Energy, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as data processors by RealTerm Energy. The updated list of these parties may be requested from RealTerm Energy at any time.
- Personal data shall be processed and stored for as long as required for the purpose for which they have been collected.
- The data concerning the user is collected to allow RealTerm Energy to provide its services, as well as for the following purposes: contacting the user, content commenting, device permissions for personal data access, hosting and backend infrastructure, interaction with external social networks and platforms, location-based interactions and registration and authentication.

- If you sign up for any optional notifications, your location as a latitude and longitude, and the details of the notification you would like to receive are collected and stored so that we can send you the appropriate notifications. You can disable these notifications at any time using the settings page accessible via the "Gear" icon in the top right-hand corner of the MyTown Dashboard.
- If your municipality is not available and you choose to let us know you would like the Application, your location and address (if typed in) is securely transmitted to MyTown servers so that we can advise Municipal decision makers that people within the area would like the Application.
- Page visits within MyTown are recorded solely for analytics purposes and cannot be tied back to an individual as only a unique “device id” is transmitted to MyTown servers. The type of device being used such as the user agent and device type (Windows Phone, IOS, Blackberry 10, etc.) is also stored. These analytics are viewable by the MyTown client (municipality) as well as by RealTerm Energy.
- When a problem report is submitted within MyTown, the MyTown servers relay the information to the municipality and may keep the report information in the MyTown database so that the municipality can review it from their secure portal. In addition, when information is submitted with MyTown anonymously via the HotLine tile, the MyTown servers relay the provided information to the designated local authorities and keep an encrypted version in a specific MyTown database so that the local authorities can review it from their secure portal.
- We value your trust in providing us information, thus we are striving to use commercially acceptable means of protecting it. However, no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and therefore we cannot guarantee its absolute security.
- Any use of Cookies – or of other tracking tools – by this Application or by the owners of third-party services used by this Application serves the purpose of providing the service required by the user, in addition to any other purposes described herein.
- Users may exercise certain rights regarding their data processed by RealTerm Energy. In particular, users have the right to do the following:
 - **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their personal data.
 - **Object to processing of their data.** Users have the right to object to the processing of their data if the processing is carried out as compelled by a court order or applicable law. Further details are provided in the dedicated section “Restrict the processing of their data” below.
 - **Access their data.** Users have the right to learn if data is being processed by RealTerm Energy, obtain disclosure regarding certain aspects of the processing and obtain a copy of the data undergoing processing.

- **Verify and seek rectification.** Users have the right to verify the accuracy of their data and ask for it to be updated or corrected.
- **Restrict the processing of their data.** Users have the right, unless under certain circumstances such as if RealTerm Energy is compelled by a court order or applicable law, to restrict the processing of their data. In this case, RealTerm Energy will not process their data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their data from RealTerm Energy.
- **Receive their data and have it transferred to another controller.** Users have the right to receive their data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the data is processed by automated means and that the processing is based on the user's consent, on a contract which the user is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

All data noted above that is transmitted to the MyTown servers is transmitted over the HTTPS secure protocol.

Under no circumstances will RealTerm Energy provide collected information to any third party, except for the analytics noted above, unless compelled by a court order or applicable law.

The RealTerm Energy reserves the right to make changes to this privacy policy at any time by giving notice to its users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to users via any contact information available to RealTerm Energy. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.