

PRIVACY POLICY

Effective Date: _____, 20____

1. PURPOSE & CONSENT.

- As defined under Canadian law, Personal Information means information about an identifiable individual (“Personal Information”).
- The disclosures mentioned herein are meant to transparently convey the methods of collecting, managing, storing, using, protecting, and sharing Personal Information by users (“Privacy Policy”).
- Users grant their consent to this Privacy Policy through it being readily available for viewing in accordance with the Personal Information Protection and Electronic Documents Act (“PIPEDA”).
- This Privacy Policy may be changed and amended from time to time and any amendments will be effective after being first posted.

2. COMPANY DETAILS.

This Privacy Policy is for the following:

Company: _____
Web URL: www. _____
Address: _____
Phone: (____) ____ - _____
E-Mail: _____

The company mentioned above (“we” or “our”) and this Privacy Policy applies to our web address and all related URLs, applications, services, products, and tools where referenced (“website”). This Privacy Policy remains valid regardless of how a user accesses the website, such as via a mobile device.

3. PERSONAL INFORMATION COLLECTED.

Users can visit and access the website without creating an account. If a profile or account is created, it is agreed that such information entered is collected and stored securely on our website.

In an effort to be as transparent as possible and compliant with PIPEDA’s policies and standards, we make known to collect the following Personal Information from a user’s interaction with our website:

- a.) Automatically Collected Information.** The following information is collected automatically when a user connects an electronic device to our website:

- IP address, geolocation, device type, device ID, device information, user history with the website, internet connection type, and web log information; and
- Any Personal Information collected and shared through cookies, browsers, devices, web beacons, and any similar or related avenues.

b.) Information Provided by Users. We collect and store Personal Information entered by users on the website or that is provided to us by other means. This information includes, but is not limited to the following Personal Information:

- Full names (first, middle, last, maiden, family members' names, etc.) e-mail addresses, financial information, employment details, Social Insurance Numbers (SIN), and any other information deemed to be sensitive or confidential;
- Any data provided by social media sites, e-mail services, or 3rd party applications that a user grants us access;
- Information obtained through a dispute or handling a request on a user's behalf; and
- Location data that is transferred by the device accessing the website.

c.) Information from Other Sources. We may, through the connection of a user's account or by using publicly obtainable information, use additional Personal Information from 3rd parties and add it to a user's profile for the benefit of the user and to provide the best website experience.

4. USING PERSONAL INFORMATION.

Users agree that their Personal Information can be used by the website for the following purposes:

- To provide the best user experience on the website, this allows us to provide the best services, products, content, media, advertisements, and offerings based on a user's Personal Information;
- To contact for marketing purposes by e-mail, SMS text message, or other electronic means provided;
- To follow-up for marketing purposes or a customer service request; or
- To prevent and deter illegal or prohibited activities.

5. SHARING PERSONAL INFORMATION.

We may offer login options that allow users to create an account using their credentials for social media profiles. Through such access, there are options that allow users to share content, products, and services of the website on social media profiles. In addition, the website may allow users to share Personal Information on their social media profiles with their consent.

6. TRANSFERRING PERSONAL INFORMATION.



We may disclose users' Personal Information to 3rd parties in accordance with PIPEDA in an effort to provide a premium online experience. We do not share or sell Personal Information to 3rd parties for marketing purposes without explicit consent from a user. It is known that we share Personal Information with the following:

- **Integrated Partners.** We share Personal Information with 3rd parties that we have entered into agreements and have integrated in order to offer the best possible experience for users. This includes, but is not limited to applications for technical assistance, software for customer service, integrated systems for hosting, providing tools, communication, and any 3rd party required for the day-to-day operations of the website.
- **Financial Services.** Even though a user's financial information is entered on the website, it is shared through integrated payment systems with the processing institution. Such information is standard to be shared and kept confidential.
- **Legal Authorities.** In the event a user's Personal Information is requested by a police office, tax agent, or other regulatory agency with the authority to make a such request, we are obligated to transfer such data in accordance with the governing law.

It is understood that the sharing of any Personal Information remains under the control of the website.

7. INTERNAL MARKETING

It is understood that the Personal Information collected from us can be used to send offers to users by any means necessary. If a user wishes to no longer receive marketing-related communication by us, they can contact us using the company details in Section 2 or unsubscribe using the link in the e-mail.

8. OUR ADVERTISING CHOICES.

We may choose to use advertising platforms that run their programs compliant with the Digital Advertising Alliance of Canada's AdChoices program principles. A user can choose to opt-out at any time from seeing personalized ads using their Personal Information or retargeting/tracking software by clicking the links in the applicable ads or by going to youradchoices.ca.

Opting out of seeing personalized ads does not free a user from seeing ads altogether. In the event of opt-out, a user may see more generalized ads that are not of the user's interest.

9. COOKIES' DISCLOSURE.

When using our website, service providers may place cookies (which are data files on a device) or web beacons (software designed to know if a user has accessed specific

content), or similar software. We use such trackable programs to help identify users in an effort to provide the best possible online experience.

10. UPDATING INFORMATION.

In most cases, a user is the only person with access to modify and update their Personal Information stored on the website. If not, then a user can contact us by phone or e-mail using the contact details mentioned in this Privacy Policy.

To close, delete, or remove Personal Information that includes an account or profile on the website, a user can do so on their own or by using the contact details mentioned in this Privacy Policy.

Any requests made to update or remove Personal Information will be processed within a reasonable time period.

11. PROTECTION AND STORAGE OF PERSONAL INFORMATION.

We understand that Personal Information is confidential, personal, and sensitive. It is in our and the user's best interest to safeguard all Personal Information stored on the website. We make an effort to do this by enforcing strict technical and administrative security measures to limit bad actors from any type of data breach.

In the event any user believes their data has been accessed without authorization, please contact us immediately using the contact details mentioned in this Privacy Policy.

12. MISCELLANEOUS.

- a.) Canada's Anti-Spam Legislation.** If at any time a user feels we are misusing their Personal Information or not adhering to the privacy protection laws enacted under Canadian law, they have the right to report such activity here: <https://www.fightspam.gc.ca/src>
- b.) 3rd Parties.** Users acknowledge that we have no control over the Personal Information that may be linked or advertised on our website. We have no responsibility over the actions of 3rd parties and their intention to use Personal Information.
- c.) 10 Principles of PIPEDA.** Our website strives to provide the best online experience for Canadians. Therefore, we try our best to comply with the 10 Principles of PIPEDA ([view here](#)) which allow Canadians to know their Personal Information is safe and being used in a correct and transparent manner.