PRIVACY POLICY for use of website

*Please note if you are a client receiving counselling, psychotherapy or hypnotherapy, we are required to maintain records under PHIPA regulations. These records are maintained separately from those that may be collected through interactions with this website, Richconnections.ca. This privacy policy is intended for interactions that fall outside the therapist-client relationship, which fall under separate regulations. For more information on these requirements, please contact your individual therapist. Stacey Kirkpatrick at Staceykikrpatrick@gmail.com or Vivienne Filiatreault at Vividrem11@gmail.com

Welcome to Rich Connections, the umbrella website for training, workshops and seminars, operated by Stacey Kirkpatrick Psychotherapy and Counselling, and Vivienne Filiatreault Psychotherapy and Hypnotherapy privacy policy. Rich Connections, Stacey Kirkpatrick Psychotherapy and Counselling, and Vivienne Filiatreault Psychotherapy and Hypnotherapy ("we," "us," "our") respect your privacy and are committed to protecting your personal data.

Last updated: June 13, 2018.

1. Introduction

This privacy policy tells you how Rich Connections collects and uses your personal data when you or your computer visit our website www.richconnections.ca, ("the site.")

It also tells you about your privacy rights and how the law protects you.

It is important that you read this privacy policy so that you are fully aware of how and why we are using your data.

This privacy policy was last updated on the 13th of June 2018.

We will not use or share your information with anyone except as described in this Privacy Policy.

By accessing <u>www.richconnections.ca</u>, you agree to the collection and use of information in accordance with our Privacy Policy and freely consent to the information collection and use practices described in this Privacy Policy.

2. Our Website, Rich Connections

Our website at <u>www.richconnections.ca</u> provides information, resources, and products which are aimed at individuals and businesses who are interested in the work of Rich Connections.

Rich Connections is located at Suite 220, 430 Hazeldean Rd, Ottawa, ON K2L 1T9.

Stacey Kirkpatrick is the data controller responsible for this website and any handling of personal data carried out by or on behalf of Rich Connections.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by mail, phone, email, or through chat or social media.

This includes personal data you provide when you:

- sign up to receive our newsletter or any free product that is sent to you via email
- make enquiries or request information be sent to you;
- create an account on our website;
- order our products or services;
- engage with us on social media;
- enter a competition, promotion, or survey;
- contact customer service; or
- leave comments or reviews on our products or services (please be kind!).

Automated technologies or interactions.

As you interact with us, including via the richconnections.ca, we may automatically collect Technical Data about your hardware, browsing actions, and patterns. We may also collect Tracking Data when you use our website, or when you click on one of our adverts (including those shown on third party websites).

Third parties or publicly available sources. We may receive personal data about you from various types of third parties, including:

- Technical Data and/or Tracking Data from analytics providers, advertising networks and search information providers;
- Contact, Financial and Transaction Data from providers of payment and fraud prevention services:
- Identity and Contact Data from data partners; and
- Data from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media or review sites We will only use your personal data when the law allows us to.

4. The information that we collect about you and how we use it

While using our website, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. We collect this information for the purpose of providing the website, identifying and communicating with you, responding to your requests/inquiries, servicing your purchase orders, and improving our services.

We collect certain information from and about our users in three ways: directly from our web server logs, cookies, and by the user, including in response to surveys and questionnaires.

a. Web server logs

When you visit our site <u>www.richconnections.ca</u>, we may track information to administer the site and analyze its usage. Examples of information we may track include:

- Your Internet protocol address.
- The kind of browser or computer you use.
- Number of links you click within the site.
- State or country from which you accessed the site.
- Date and time of your visit.
- Name of your Internet service provider.
- Web page you linked to our site from.
- Pages you viewed on the site.

b. Use of Cookie

We may use cookies to collect information in order to improve our services for you and to enhance your user experience.

A cookie is a small text file that is placed on your hard disk by a web page server which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and transferred to your device. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. For example, if you personalize a web page or navigate within a site, a cookie helps the site to recall your specific information on subsequent visits. Hence, this simplifies the process of delivering relevant content and eases site navigation by providing and saving your preferences and login information as well as providing personalized functionality.

We may use remarketing services to advertise on third party websites to you after you visited our Service. We, and our third-party vendors, may use cookies to inform, optimize and serve ads based on your past visits to our website.

Google

- o Google AdWords remarketing service is provided by Google Inc.
- You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: http://www.google.com/settings/ads
- Google also recommends installing the Google Analytics Opt-out Browser Addon: https://tools.google.com/dlpage/gaoptout for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.
- o For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: http://www.google.com/intl/en/policies/privacy/

Twitter

- o Twitter remarketing service is provided by Twitter Inc.
- You can opt-out from Twitter's interest-based ads by following their instructions: https://support.twitter.com/articles/20170405
- o You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: https://twitter.com/privacy

Facebook

- o Facebook remarketing service is provided by Facebook Inc.
- O You can learn more about interest-based advertising from Facebook by visiting this page: https://www.facebook.com/help/164968693837950
- o To opt-out from Facebook's interest-based ads follow these instructions from Facebook: https://www.facebook.com/about/ads/#568137493302217
- o Facebook adheres the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA http://www.aboutads.info/choices/, the Digital Advertising Alliance of Canada in Canada http://youradchoices.ca/ or the European Interactive Digital Advertising Alliance in Europe http://www.youronlinechoices.eu/, or opt-out using your mobile device settings.
- o For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: https://www.facebook.com/privacy/explanation

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help feature on most browsers provide information on how to accept cookies, disable cookies or to notify you when receiving a new cookie.

If you do not accept cookies, you may not be able to use some features of our Service and we recommend that you leave them turned on.

c. Personal Information of Users

Visitors to <u>www.richconnections.ca</u> may be permitted to register for certain services such as the weekly email. When you register, we will request some personal information such as name, address, email, and other relevant information.

We will not disclose personally identifiable information we collect from you to third parties without your permission except to the extent necessary including:

- To fulfill your service requests for products or services.
- To protect ourselves, our customer or our vendors from liability or to defend our rights, including investigations of fraud or misconduct.
- To third parties who have agreed in writing to maintain such information in confidence and use such information solely in performance of services to us.

- To respond to legal process or comply with law, including subpoenas, if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our site.
- To entities under common ownership or control with us or to our owners, or in connection with a merger, acquisition, or liquidation of the company.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

*If you are also a counselling or psychotherapy client for Stacey Kirkpatrick or Vivienne Filiatreault, we may collect separately, Special Categories of Personal Data and store information as required by regulations under PHIPA. This is separate from interactions with Richconnections.ca

Remember, if you choose not to share personal data with us, or refuse certain contact permissions, we might not be able to provide the products and services you've asked for.

5. Withdrawing consent

If after you opt-in or after having not initially taken an opportunity to opt-out, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at Stacey@richconnections.ca.

6. Our use of single-pixel gifs

Our web pages may contain electronic images known as web beacons—sometimes also called single-pixel gifs—that allow us to count users who have visited those pages and to deliver cobranded services. We may include web beacons in promotional e-mail messages or newsletters in order to determine whether messages have been opened and acted upon.

Some of these web beacons may be placed by third party service providers to help determine the effectiveness of our advertising campaigns or email communications.

These third parties have access to your personal information only to perform specific tasks on our behalf and are obligated not to disclose or use your information for any other purpose.

These web beacons may be used by these service providers to place a persistent cookie on your computer. This allows the service provider to recognize your computer each time you visit certain pages or emails and compile anonymous information in relation to those page views, which in turn enables us and our service providers to learn which advertisements and emails bring you to our website and how you use the site.

7. Communications

We may use your Personal Information to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you.

We may use your Identity, Contact, Technical, Tracking, Usage and Profile Data to form a picture of what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you and tell you about them. This is what we call direct marketing.

We may carry out direct marketing by email, social media, or text.

On our website, we always try hard to make it really clear what we are doing and what communications you will be sent, whether it's you deciding to sign up to a newsletter, or sign up for a course—and you have a right at any time to change your mind and say no thank you and opt out (but we'd be really sorry to see you go, so please gives us a chance by fine tuning your preferences before really leaving us!). The easiest way to opt out is to use the unsubscribe link at the bottom of the communication. If you have any difficulty opting out, please contact us at Stacey@richconnections.ca

8. Accessing your account information

We will provide you with the means to ensure that personally identifiable information in your web account file is correct and current. You may review this information by contacting us by sending an email to Stacey@richconnections.ca

9. Do not track

We have not implemented any technology that would effectively recognize do-not-track signals and note that some content available on our site may be made available through relationships with third party providers who we do not control and who may collect and/or disclose personally identifiable information.

10. How to update, correct, or delete your information

If you would like to: access, correct, amend or delete any personally identifiable information we store about you, register a complaint, or simply want more information, contact us at Stacey@richconnections.ca

11. How we protect information

The security of your Personal Information is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store, in order to protect it from unauthorized access, destruction, use, modification, or disclosure.

However, please be aware that no method of transmission over the internet, or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from you.

We cannot guarantee the security of our databases or the security during transmission to us of the information you supply over the Internet. You can help us by taking precautions to protect your personal information when you are on the Internet and only disclose information that you want made public. Change your passwords often using a combination of letters and numbers and make sure to use a secure web browser.

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Canada and choose to provide information to us, please note that we transfer the information, including Personal Information, to Canada and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

12. Links to other sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

13. Aggregate data

We may share and publicize aggregate and/or de-identified information shared with third parties and the public.

14. Children under 13

This website is not intended for children and we do not knowingly collect data relating to children.

Only people age 18 or older have permission to access www.richconnections.ca.

We do not specifically market to or knowingly collect personally identifiable information from children under 13. Because some information is collected online, it may not appear to be the personal information of a child under 13. If you are a parent or guardian and you learn that your children have provided us with personal information, please contact us. If we become aware that we have collected personal information from children under age 13 without verification of

parental consent, we take steps to remove that information from our servers. If you are under 13, please do not register for any of our services or provide us any information about yourself (such as your name, email address or phone number).

15. Changes to this Privacy Policy

This Privacy Policy is effective as of June 13, 2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

16. Translations

This Privacy Policy is executed in English. You agree and acknowledge that you have reviewed this Privacy Policy in English. To the extent that any translations of this Privacy Policy are provided, they are solely for convenience and is of no binding effect. The English language version of this Privacy Policy shall control.

17. Your legal rights in the EU

If the General Data Protection Regulation applies to you because you are in the European Union, you have rights under data protection laws in relation to your personal data:

The right to be informed – that's an obligation on us to inform you how we use your personal data (and that's what we're doing that in this privacy policy);

The right of access – that's a right to make what's known as a 'data subject access request' for copy of the personal data we hold about you;

The right to rectification – that's a right to make us correct personal data about you that may be incomplete or inaccurate;

The right to erasure – that's also known as the 'right to be forgotten' where in certain circumstances you can ask us to delete the personal data we have about you (unless there's an overriding legal reason we need to keep it, such as PHIPA);

The right to restrict processing – that's a right for you in certain circumstances to ask us to suspend processing personal data;

The right to data portability – that's a right for you to ask us for a copy of your personal data in a common format (for example, a .csv file);

The right to object – that's a right for you to object to us processing your personal data (for example, if you object to us processing your data for direct marketing); and

Rights in relation to automated decision making and profiling – that's a right you have for us to be transparent about any profiling we do, or any automated decision making.

These rights are subject to certain rules around when you can exercise them. You can see a lot more information on them, if you are interested, on the UK Information Commissioner's Office website.

If you wish to exercise any of the rights set out above, please contact us (see "Contacting us" about privacy).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

18. Contacting us

If you have any questions about this privacy policy, or would like to exercise any of your rights, please email us at stacey@richconnections.ca or write to us with your letter addressed to:

Rich Connections

Attention: Privacy Statement Personnel

Suite 220, 430 Hazeldean Rd

Ottawa, ON K2L 1T9

If you need help about our products and services, or this website generally, please contact us <u>here.</u>

19. A request from us to you

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can do this by updating your account. Thank you.

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