

## PRIVACY POLICY

This is the privacy policy (“**Privacy Policy**”) of the CENTRE FOR COLLABORATION, MOTIVATION AND INNOVATION, its subsidiaries and affiliates (collectively referred to as “**CCMI**”).

This Privacy Policy sets out what Personal Information we collect about you, how and why we use it, who we disclose it to, and how we secure it. This Privacy Policy applies whether that information is collected via our website [www.centrecmi.ca](http://www.centrecmi.ca) (the “**Website**”), our online portal (the “**Portal**”), in person or otherwise, including through providing or administering our workshops and webinars (together, the “**Programs**”). This Privacy Policy also summarizes your rights in relation to your Personal Information and contains the contact information for our Privacy Officer in case you have any further questions or concerns about this Privacy Policy. We have divided this Privacy Policy into sections, as outlined below.

### COMMITMENT TO PRIVACY

CCMI is committed to protecting your Personal Information and complying with applicable data protection and privacy laws. This Privacy Policy (the “**Policy**”) documents our ongoing commitment to you and has been developed in compliance with privacy law in Canada.

In this Policy, the terms “you”, “user” and “your” refer to a visitor of our Website, user of our Programs, or individual who otherwise provides us with their Personal Information and the terms “we”, “us” and “our” refer to CCMI.

***Please read this Privacy Policy carefully. By submitting Personal Information to us or by otherwise using our Website, Portal, or any of our Programs, you agree that you have read, understood, and agree to be bound by this Privacy Policy and hereby consent to the collection, use and disclosure of Personal Information in accordance with this Privacy Policy.***

***If you do not agree with some or all of this Privacy Policy, please do not use the Website, Portal or our Programs.***

Further, if you are not of the age of majority in your place of residence, please do not use our Website or Portal.

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**1. SCOPE OF POLICY**

This Policy addresses Personal Information about individuals and does not apply to information about corporate or commercial entities. In this Policy, **“Personal Information”** means information about an identifiable individual, such as an individual’s name, home address, date of birth, home phone number, email address, or credit card information. Personal Information does not include information to enable an individual at a place of business to be contacted, such as their name, position name or title, business telephone number, business address or business email address.

The type of Personal Information we collect will vary depending on your interactions with us and the Programs we provide you, but may include your name, address, e-mail address, telephone number, your credit card or other payment information, and other information you choose to provide us. If you choose to withhold any Personal Information requested by us, it may not be possible for us to provide the Programs to you or respond to your query.

Personal Information may be subject to protection under other policies and practices and through contractual arrangements, including confidentiality agreements.

If you provide Personal Information to us about another person, you must have their consent to do so and you are responsible for telling the other person that you have provided their Personal Information to us. You must inform them that CCMI may use their Personal Information and refer them to this Policy. By providing Personal Information relating to another person to CCMI, you represent that you are legally permitted to provide such Personal Information, and CCMI will not be responsible for verifying any such authorization.

**2. ACCOUNTABILITY**

CCMI is accountable and responsible for Personal Information in our custody or under our control. CCMI has designated a Privacy Officer who is responsible for ensuring our compliance with applicable data protection and privacy laws. CCMI has adopted procedures to protect Personal Information, receive and respond to complaints and inquiries, train staff regarding this Policy and other internal policies and procedures.

**3. COLLECTING PERSONAL INFORMATION**

In the course of providing our Programs and services, and in connection with our other organizational activities, we may collect your Personal Information. We will only collect Personal Information as permitted under the applicable privacy legislation.

We may collect information in a variety of ways, including where you:

- are referred to or enroll in our Programs;
- access our Portal or participate in our Programs;
- request us to provide you information about us or any of our Programs, for example by signing up for our newsletter;
- submit an employment application to us;
- send us an email inquiry either through our Website or directly to our email;
- contact us by telephone; or
- provide feedback in an online survey.

We may also collect aggregate information which tells us about visitors to our Website or our Portal, but not the identity of those visitors. For example, we may collect information about the date, time and duration of Website and Portal visits and which pages of our Website and Portal are most commonly accessed. We also collect information from your devices (including mobile devices) and applications you use to access and use our Website and Portal, which may include the device identification number and type, browser information, location information, and connection information such as statistics on your page views, traffic to and from the Website and Portal, referral URL, ad data, your IP address, your browsing history, and your web log information. Some of this information is collected using cookies, pixels or other technologies, which are described in further detail in the “Cookies and similar technologies” section below.

The purpose of collecting this aggregate information is to help us administer and improve our Programs and services. Data collected through our Website and Portal on an anonymous and aggregated basis helps us measure interest in and use of our Website and Products. We reserve the right to provide our analyses based on such anonymous and aggregated data to third parties.

#### **4. USING PERSONAL INFORMATION**

CCMI generally uses Personal Information for purposes related to managing and developing our operations, including the following purposes:

- to establish and manage our relationship with you, including to offer, provide you with information about and provide and administer our Programs, process payments and refunds for our Programs and supply, deliver and bill for our Programs and related materials;

- to authenticate your identity, register your account and authenticate you when you log into your account;
- to communicate with you and about our Website, Portal and Programs, fulfill your requests, request feedback through online surveys and notify you of changes to our Programs;
- to provide, monitor, personalize and improve our Website, Portal, and Programs;
- manage and develop our organization, including to bill and collect payment, train employees and volunteers, ensure the quality of our Programs, respond to and resolve complaints, process and respond to applications for employment or volunteer positions, compile statistics, analyze results, perform internal data management and analytics, perform administrative and record keeping activities and for research and modelling;
- protect our rights and the rights of other individuals;
- investigate security breaches, protect against, detect, investigate and prevent potentially fraudulent unauthorized or illegal activities or cooperate with government and law enforcement authorities in connection with legal matters;
- aggregate, de-identify and anonymize Personal Information; and
- for other purposes related to our relationship, where you have provided your consent or as otherwise permitted or required by law.

When your Personal Information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use and your consent will be sought unless the use is authorized or required by law.

## **5. DISCLOSING PERSONAL INFORMATION**

We may share your Personal Information in the following circumstances:

- with the organization or organizations that are sponsoring, funding or facilitating your participation in our Programs to inform them of your progress in and completion of our Programs;
- with third party service providers and partners that help us provide our Website, Portal, and Programs, including our third-party technology partners providing website hosting, data warehousing, data analysis, event logging and other information technology, customer service, payment processing, user analytics and email delivery and messaging;
- with legal and other professional advisers, law courts and enforcement bodies in all countries we operate in, in connection with protecting our rights and property, including for security breach, loss or fraud prevention, investigation or mitigation purposes;

- if a law, regulation, search warrant, subpoena or court order legally requires or authorizes us to do so;
- with any third party, where you have provided your consent for such disclosure or where disclosure is required or permitted by law; and
- other purposes identified in other sections of this Privacy Policy or when your Personal Information is collected, or where such disclosure as permitted or required by law.

In such circumstances the third party will hold and use your Personal Information in compliance with privacy laws and will not disclose your Personal Information without your consent pursuant to this Policy. Some service providers and partners may be located outside of Canada where Personal Information may be subject to the laws of those jurisdictions. Such locations include and are not limited to India, the United States, the Netherlands, China, Germany and Ireland. We require all service providers to process and store your Personal Information in a secure manner and in accordance with European and Canadian laws on data protection.

## **6. LINKS**

Our Website and Portal may contain links to the websites of other organizations which may be of interest to you. Similarly, you may be directed to the websites of other organizations to perform certain functions provided on our Website. Linked websites are operated by third parties who are responsible for their own privacy practices.

Program and other content on the Website and Portal may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website. CCMI is not responsible for these websites.

## **7. LIMITS ON COLLECTION, USE, DISCLOSURE AND RETENTION**

CCMI will obtain your consent to collect, use or disclose Personal Information except where CCMI is authorized or required by law to do so without consent. Your Personal Information will only be used, collected or disclosed for the purposes set out herein, any additional purposes disclosed to and consented to by you, and as authorized by law.

CCMI will not collect Personal Information indiscriminately and will limit its collection of your Personal Information to where we have lawful bases. Lawful bases include consent, contract and, where applicable, legitimate interests. Where we rely on your consent to process Personal Information, you have the right to withdraw or decline your consent at any time and, where we rely on legitimate interests, you have the right to object.

CCMI will keep Personal Information for as long as necessary to fulfill the purposes for which it was collected and as permitted or required by law. To determine the appropriate retention

period, we consider the amount, nature and sensitivity of the Personal Information, the purposes for which we process it and whether we can achieve those purposes through other means.

CCMI will destroy, erase or make anonymous Personal Information when it is no longer required as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the Personal Information and retention is no longer necessary for legal or business purposes.

CCMI will take due care when destroying Personal Information so as to prevent unauthorized access to such information.

## **8. CONSENT**

Depending on the circumstances, your consent may be express, implied, deemed or given through your authorized representative.

Consent may be provided orally, in writing, electronically, through action or otherwise. For example, oral consent could be expressed over the telephone at the time information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application form. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you submit an inquiry through our Website we will assume your consent to the collection, use and disclosure of your Personal Information in connection with your inquiry or for other purposes identified to you at the relevant time. Deemed consent is consent we assume in the event that you do not exercise an opt-out mechanism offered to you.

You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by written notice to CCMI. Upon receipt of your written notice, CCMI will stop collecting, using or disclosing your Personal Information, and CCMI will inform you of the consequences of the withdrawal, which may include the inability of CCMI to provide certain Programs, products or services for which the delivery of that Personal Information is a prerequisite.

## **9. SAFEGUARDING PERSONAL INFORMATION**

CCMI protects the Personal Information in its custody or control by making reasonable and appropriate security arrangements to prevent loss or accidental, unauthorized or unlawful access, use, disclosure, copying, modification, disposal or other similar threats. Unauthorized use of Personal Information by anyone affiliated with CCMI is prohibited and constitutes grounds for disciplinary action.

We have implemented physical, organizational, contractual and technological security measures to protect your Personal Information from loss or theft, and unauthorized access, disclosure, copying, use or modification. In most circumstances, the Personal Information you provide to us is protected using SSL (Secure Socket Layer) technology. SSL is the industry standard method of

encrypting personal information and credit card details so that they can be securely transferred over the Internet. All payment details are transmitted over dedicated network infrastructure and stored in compliance with Payment Card Industry Data Security Standards.

You should be aware that confidentiality and security cannot be assured when Personal Information is transmitted through the internet or wireless communication. CCMI will not be responsible for any loss or damage suffered as a result of a breach of security or confidentiality when Personal Information is transmitted by e-mail or wireless communication, and you do so at your own risk.

You are solely responsible for ensuring you do not disclose your Portal account access information to third parties. This includes but is not limited to not disclosing such information to anyone, ensuring that sufficient security software is installed and running on your computer, smartphone or tablet, that your network firewall is of sufficient quality and that your wireless connection is encrypted to a degree that will prevent third party access. We are not responsible for any failure by you to secure your own device and its access to the Internet or your use of public, unsecured networks. We are also not responsible for any failure by you to eliminate malware. These failures and others can make you vulnerable to privacy breaches and would put you and your data at risk.

## **10. LOCATION OF PERSONAL INFORMATION**

Personal Information collected by CCMI is stored and processed primarily in Canada, the US, the EU, and India. However, we may also use third party services providers, such as payment processors and technology partners, that may use, process and store your Personal Information in another country. Personal Information provided to third parties outside of Canada is subject to the laws of those jurisdictions. While we will use reasonable measures to ensure all Personal Information is protected, we cannot ensure that the laws of other countries will offer the same level of protection as your local laws.

By using our Website, Portal and Programs, or otherwise submitting your Personal Information to us, you hereby consent to the transmission, processing and storage of Personal Information outside of Canada and the US (as applicable).

## **11. COOKIES, DO NOT TRACK SIGNALS, AND SIMILAR TECHNOLOGIES**

When you visit our Website or Portal a cookie or similar technology may be stored on your device. A cookie is a small amount of data that is transferred to your browser by a web server and can only be read by the website that gave it to you. It functions as your identification card. It is not a program and cannot be executed as code or deliver viruses.

We may use cookies and other technology to help us track use of our Website and Portal by users, including casual visitors to our Website and Portal —such as the number and frequency of visits to our pages, which parts of our Website and Portal are visited and interaction with any advertising content. The Website and Portal also uses cookies to provide users with certain features and preference settings. This information provides us with constructive feedback about

our Website and Portal so that we can identify the most effective areas and generally improve our Website on an ongoing basis.

Cookies can also customize the Website and Portal to your particular interests or store your Personal Information – like passwords or user IDs. If a website ever greets you with your name, chances are it's using a cookie to do so.

Most browsers are initially set to accept cookies. You may be able to configure your browser to restrict or block cookies. However, if you disable cookies you may find this affects your ability to use certain parts of our Website or online Products. For example, while you can use the Website without cookies, you may have to re-enter information each time you visit. For more information about cookies and instructions on how to adjust your browser settings to accept, delete or reject cookies, see the [www.allaboutcookies.org](http://www.allaboutcookies.org) website.

When you visit our Website, Google Analytics adds a cookie to distinguish you from other users, track your behaviour across our Website and gather information about users' usage of the Website. We use this information to improve the user experience of the Website. The cookie lasts for up to 2 years. More information about the Google Analytics cookie can be found in the [Google Analytics Privacy Policy](#). You can opt out of Google Analytics tracking by installing the Google Analytics Opt-Out Browser Add-on.

We have not implemented the necessary Program changes to honour "Do Not Track" browser signals for users in the U.S.

## **12. DIRECT MARKETING**

We are committed to complying with applicable anti-spam laws. Where we have your consent or it is lawful to do so, we may provide you with direct marketing communications about our Products which may be of interest to you. Such information may be sent to you by post, email, telephone or SMS.

If you have consented to receiving marketing materials from us, you can withdraw your consent to receiving those communications at any time by:

- using the "unsubscribe" mechanism in our emails;
- contacting us using the contact information provided below.

Even if you opt-out of these marketing messages, we reserve the right to send you transactional or informational emails such as customer service communications, updates to Product information and invoices in connection with the Products you have purchased or changes to our Website, your account or our policies.

## **13. YOUR RIGHTS**

You have the following rights:



- the right of access to the Personal Information under CCMI's control, information about the ways in which that Personal Information is being used, and a description of the individuals and organizations to whom such Personal Information has been disclosed;
- the right of rectification of inaccurate Personal Information and right of completion of incomplete Personal Information;
- the right to erasure of Personal Information in certain circumstances;
- the right to restrict Personal Information processing in certain circumstances;
- the right to object to Personal Information processing for direct marketing purposes and other purposes;
- the right to Personal Information portability in certain circumstances; and
- the right to launch a complaint with a supervisory authority.

CCMI may charge a minimal fee for providing Personal Information in response to an access request if such request is clearly unfounded or excessive and will provide an estimate of any such fee upon receiving an access to personal information request. CCMI may require a deposit for all or part of the fee.

CCMI will make Personal Information available within the lesser of 30 days or one calendar month from the date of request or will provide written notice and explanation if additional time is required to fulfill the request.

Where a request is refused in whole or in part, CCMI will notify you in writing, giving the reason for refusal and outlining further steps which are available to you.

#### **14. ACCURACY**

CCMI will make a reasonable effort to ensure that the Personal Information it is collecting, using or disclosing is accurate and complete. CCMI will rely on you to ensure that certain information, such as your street address, e-mail address or telephone number, is current, complete and accurate.

If you notify CCMI of the inaccuracy or incompleteness of Personal Information, CCMI will amend the information as required. If appropriate, CCMI will send the amended Personal Information to third parties to whom the Personal Information has been disclosed.

When a challenge regarding the accuracy of Personal Information is not resolved to your satisfaction, CCMI will annotate the Personal Information under its control with a note that a correction was requested but not made.

#### **15. CHANGES TO POLICY**

To keep pace with economic, technological, and other changes, CCMI may revise this Privacy Policy from time to time. The revised Privacy Policy will be posted on our Website and will come into effect 30 days after it is posted. If the changes are material, we will provide notice to you by email or a notice on our website to provide you with the opportunity to review the changes before they become effective. If you object to any changes, you may close your account or unsubscribe.

## **16. COMPLAINTS**

Any inquiry, complaint or question regarding this Privacy Policy must be directed in writing to the CCMI Privacy Officer.

Contact Information:

Privacy Officer

[privacy@centrecmi.ca](mailto:privacy@centrecmi.ca)

1-778-466-5146

PO Box 1343, Vernon, BC, V1T 6N6

**DATE: 2023-06-22**