

## **PRIVACY POLICY**

### **INTRODUCTION**

ePrograms Inc. ("**we**", "**our**", "**us**") respects your privacy and is committed to protecting it by complying with this policy.

This policy describes:

- How we collect, use, disclose, and protect the personal information of our customers and website and mobile application users ("**you**").
- Describes the types of information we may collect from you or that you may provide when you visit the website located at <http://www.eprograms.ca> (the "**Website**").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

We will only use your personal information in accordance with this policy unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

Privacy laws in Canada generally define "personal information" as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person.

This policy applies to information we collect, use, or disclose about you:

- On the Website.
- In email, text, and other electronic messages between you and us.
- That you otherwise provide to us.

The Website may include links to third-party websites, plug-ins, services, social networks, or applications, and may require you to use third-party websites or applications in order to make full use of the services (the "**Services**") offered through the Website (including the use of third-party video conference applications). Clicking on those links, enabling those connections or using such third-party websites or applications may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage or use a third-party plugin or application, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites or applications, and we encourage you to read the privacy policy of every website you visit or application that you use.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, your choice is not to use our Website or other Services. By accessing or using this Website or our other Services, you indicate that you understand, accept, and consent to the practices described in this policy. This policy may change from time to time (see the heading "Changes to Our Privacy Policy" below). Your continued use of this Website or our Services after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates.



## **INFORMATION WE COLLECT ABOUT YOU**

We collect and use several types of information from and about you, including:

- **Personal information**, that we can reasonably use to directly or indirectly identify you, such as your name, mailing address, e-mail address, telephone number, Internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier, billing and account information, and any other identifier we may use to contact you ("**personal information**").
- **Non-personal information**, that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, and we may derive non-personal statistical or aggregated data from personal information.
- **Technical information**, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Website or other Services, and usage details.
- **Non-personal details about your Website interactions**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Website (including date and time), products or services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, or any phone number used to call our customer service number.

## **HOW WE COLLECT INFORMATION ABOUT YOU**

We use different methods to collect your information, including through:

- **Direct interactions with you when you provide it to us**, for example, by filling in forms, registering for a user account, purchasing classes or other services from us, offering to instruct classes for purchase by other users, or corresponding with us by phone, email, or otherwise.
- **Automated technologies or interactions**, as you navigate through our Website or use our other Services. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

### **Information You Provide to Us**

The information we collect directly from you on or through our Website or Services may include:

- Information that you provide by filling in forms. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material or requesting further services.
- Records and copies of your correspondence (including email addresses), if you contact us.



- Details of transactions you carry out through our Website or use of our other Services and of the fulfillment of your orders. You will be required to provide financial information before placing an order through our Website or other Services.

You may also provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although we take precautions to keep access to our Website and other Services secure, please be aware that no security measures are perfect. Additionally, we cannot control the actions of other users of the Website or other Services with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that unauthorized persons will not view your User Contributions. For the purposes of this policy, reviews or other comments are deemed to be User Contributions.

### **Information We Collect Through Cookies and Other Automatic Data Collection Technologies**

As you navigate through and interact with our Website or other Services, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical information and may include personal information, and we may maintain it or associate it with personal information we collect in other ways. It helps us to improve our Website and other Services and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website or other Services according to your individual interests.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings that are used for browser cookies.
- **Web Beacons.** Pages of our Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for



example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

### **Third Party Use of Cookies and Other Tracking Technologies**

Some content or applications on the Website, including advertisements, are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they are used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

### **Video Recordings**

We may record any classes offered through the Website (including those made available through third party video conferencing applications) and we may use, reproduce, modify, perform, display and distribute such recordings for any purposes whatsoever, including for marketing and promotional purposes. By using our Website and related services, you consent (on your own behalf or as parent or guardian of a minor) to you or your child appearing in any such recorded videos.

### **HOW WE USE YOUR INFORMATION**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To improve our Website, products or services, marketing, or customer relationships and experiences.
- To allow you to participate in interactive features on our Website.



- To measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

### **DISCLOSURE OF YOUR INFORMATION**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- In accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our customers and users is among the assets transferred.
- To advertisers and advertising networks that require the information to select and serve relevant advertisements to you and others. We do not disclose data about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 400 women between 30 and 45 have clicked on their advertisement on a specific day). We may also use such aggregate information to help advertisers target a specific audience (for example, men in a specific location). We may make use of the personal information we have collected from you to enable us to display our advertisers' advertisement to that target audience.
- To contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.



- To enforce or apply our terms of service and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers, or others.

### **TRANSFERRING YOUR PERSONAL INFORMATION**

We may transfer personal information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

### **DATA SECURITY**

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

### **DATA RETENTION**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

### **CHILDREN UNDER THE AGE OF 13**

Although applicable privacy law does not differentiate between adults and minors, it requires meaningful consent for personal information collection, use, and disclosure. For consent to be meaningful and informed, the consentor must be able to understand the nature, purposes, and



consequences of personal information collection, use, and disclosure. Accordingly, we require parent or guardian consent for children under the age of 13 to use the Website or the Services.

No one under age 13 may provide any information to or on the Website or through our other Services without consent from a parent or guardian. We do not knowingly collect personal information from children under 13 without parent or guardian consent. If you are under 13, do not use or provide any information on this Website or on or through any of its features, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

If a child under 13 would like to access the Website or other Services, he/she may do so only with the prior consent of a parent or legal guardian, and may only provide personal information in the presence of a parent or guardian. By using the Website or the Services, you confirm that you are 13 or over, or are under 13 but in the presence of a parent or legal guardian when providing personal information, and otherwise with the consent of a parent or legal guardian. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information.

### **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you.

If you want to review, verify, correct, or withdraw consent to the use of your personal information you may also send us an email at [info@eprograms.ca](mailto:info@eprograms.ca) to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

### **WITHDRAWING YOUR CONSENT**

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at [info@eprograms.ca](mailto:info@eprograms.ca). Please note that if you withdraw your consent we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.

### **CHANGES TO OUR PRIVACY POLICY**

It is our policy to post any changes we make to our privacy policy on this page. Your continued use of this Website or our Services after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates.



## **CONTACT INFORMATION AND CHALLENGING COMPLIANCE**

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at:

Privacy Officer  
8 Caymus Street  
Richmond Hill, ON L4B 4G4  
[info@eprograms.ca](mailto:info@eprograms.ca)

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact our Privacy Officer using the contact information listed above.

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