

## **ELECTRONIC PRIVACY POLICY**

### **2411008 ONTARIO INC. O/A JEN REED COACHING**

Any client, agent, or other third party (the “User”) in the course of its professional relationship with 2411008 Ontario Inc. a/o Jen Reed Coaching (“JRC”) or otherwise, acknowledges that when visiting the JRC web site at <http://www.jen-reed.com>, or other online resources maintained by JRC, the User will provide personal information to JRC.

Protecting a User’s privacy is paramount to JRC. To accommodate any concerns with how personal information is protected, JRC has created this policy (the “Electronic Privacy Policy”), which articulates how JRC collects, uses and discloses personal information obtained by JRC when Users are visiting the JRC web site <http://www.jen-reed.com> (the “Web Site”), utilizing the services provided via the Web Site, as well as information received from electronic mail and other downloadable material.

For information about the Electronic Privacy Policy, please contact the JRC Privacy Officer via electronic mail at [jen@jen-reed.com](mailto:jen@jen-reed.com).

The Electronic Privacy Policy does not apply to personal information collected from offline resources and communications, except in cases where such personal information is consolidated with personal information collected by JRC. The Electronic Privacy Policy also does not apply to third-party online resources to which JRC Web Sites may link, where JRC does not control the content or the privacy practices of such resources.

JRC reserves the right to alter or modify the Electronic Privacy Policy from time to time in its sole and absolute discretion. By using the Web Site, you acknowledge and agree to be bound by the provisions of the Electronic Privacy Policy.

#### **Consent**

By using the Web Site the User consents to the collection, use, and disclosure of the User’s personal information in accordance with this Electronic Privacy Policy. If the User does not consent to the Electronic Privacy Policy, as set out herein, the User must immediately cease use of the Web Site. Please note that the User’s access and continued use of the Web Site will be deemed as consent by JRC.

#### **Privacy Legislation**

Since January 1, 2004, all Canadian organizations engaged in commercial activities have been required to comply with the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) and the Canadian Standards Association Model Code for the Protection of Personal Information, incorporated by reference into PIPEDA. These obligations extend to JRC and are integrated into the Electronic Privacy Policy herein.

### **What is Personal Information?**

Personal Information is defined in PIPEDA as information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization. In other words, it does not include the information that one expects to find on a business card or information that is available in public records.

Personal Information includes, but is not limited to, a User’s name, mailing address, telephone number, e-mail address, facsimile number, age, gender, marital status, health status, financial status, credit card information, credit history, interests, browsing preferences, web logs, Internet protocol addresses, network and server particulars, and/or other information relevant to the Web Site, promotional and marketing activities (the “Personal Information”).

### **How is Personal Information collected?**

JRC collects a User’s Personal Information in one of three ways; unsolicited information provided by a User, information obtained from the public or third parties, and information collected from a User’s computer or other electronic device.

#### Unsolicited Information

JRC may collect unsolicited Personal Information provided by a User voluntarily, such as Personal Information and other data entered into forms or data fields on the Web Site or via any other online resources.

#### Information from Public or Third-Parties

JRC may collect Personal Information from Users that register on the Web Site, from public or third party information sources to verify their professional credentials and identity.

## Information Collected from a User's Computer or other Electronic Device

JRC collects information from a User's computer and other electronic devices when a User accesses the Web Site and other online resources. The information that is collected during this process includes but is not limited to a User's Internet Protocol (IP) address, domain name, browser type, date and time of a User's request and information provided by tracking technologies, such as cookies and single-pixel tags, which are defined below.

If a User is accessing the Web Site from a mobile device, JRC may collect information about the User's device, such as a User's device ID and device type, as well as usage information, use of mobile Web Sites and other mobile resources.

"Cookies" are small text files placed on a User's hard drive that assists JRC in providing a customized browsing experience. Cookies contain a unique identification number that identifies a User's browser, but not the visitor, to JRC's computers each time a User visits the Web Site. JRC uses cookies to make navigation of the Web Site easier for visitors and to facilitate efficient registration procedures. If a User is concerned about cookies, most browsers permit individual to refuse to accept all cookies or to notify Users when a User has received a cookie. However, a User should note that if the User refuses to accept cookies, the User may not be able to use some of the features available on the Web Site and other online resources.

"Single-pixel tags", also known as web beacons or web tags, are graphics that function similar to cookies. Single-pixel tags are not visible. Single-pixel tags are used to collect information in web logs that do not identify a User personally such as web pages viewed, the web site a User came from and the advertisement the User clicked on to visit the Web Site. Single-pixel tags are also used to confirm whether promotional or other commercial e-mail messages that are sent via the Web Site are opened.

In order to properly manage the Web Site, JRC may also anonymously use log information on operational systems, and identify categories of Users by items such as domains and browser types. Statistics may be reported to a party assisting JRC in offering the Web Site such as webmasters.

### **How is the Personal Information used?**

JRC collects, uses and discloses Personal Information to better understand a User's needs and to provide a User with better services. In particular, Personal Information is collected for the following reasons:

- internal record keeping;
- to improve services;
  
- to register a User for, and facilitate a User's participation in, certain areas of the Web Site, including online bulletin boards, discussion or message forums;
- to gather a User's opinion and feedback through surveys;
- to audit online resources for authorized access and security;
- to customize the Web Site according to a User's interests; and
  
- such other uses as may be permitted or required by applicable law.

### **To whom does JRC provide Personal Information?**

Personal Information will be accessible to JRC, and to individuals and organizations that use Personal Information solely for and at the direction of JRC. Uses and disclosures of Personal Information by external individuals and organizations acting on JRC's behalf are governed by agreements that require Personal Information to be protected appropriately.

Unless otherwise advised, JRC will not sell or share Personal Information except as described in the Electronic Privacy Policy and other applicable privacy notices. However, JRC reserves the right to disclose Personal Information, including e-mail addresses, for reporting to government authorities, to parties in relevant legal proceedings as authorized by the presiding court or tribunal and otherwise to the extent required or explicitly authorized by law. Except as provided in the Electronic Privacy Policy, Personal Information will not otherwise be shared without a User's permission.

### **Requests for Non-Disclosure**

A User may withdraw their consent to JRC's collection, use and disclosure of Personal Information at any time, subject to legal and/or contractual restrictions and upon reasonable notice, by contacting JRC's Privacy Officer. Please note certain Personal Information will be collected automatically when a User visits the Web Site. A User's continued use of the Web Site will be deemed consent to obtain any Personal Information that derives from the User's use of the Web Site.

### **How does a User limit disclosure of a User's Personal Information?**

A User may choose not to provide Personal Information to JRC by electing not to enter any Personal Information into a form or data field, and by not using any personalized services provided by the Web Site or by any other online resources. However, some of the Web Site may only be available to Users that provide personal information or request the use of personalized services.

If a User previously agreed to permit the use of Personal Information for marketing or promotional purposes, a User may revoke consent by following the opt-out instructions in each communication or by writing to JRC's Privacy Officer.

### **How does JRC protect a User's Personal Information?**

JRC employs physical, administrative, and technological security safeguards appropriate to the sensitivity of the information. JRC will take all reasonable steps to protect Personal Information as it is transmitted from a User's computer to the Web Site or other online resources and servers. JRC will also protect Personal Information from unauthorized access, disclosure, alteration or destruction. JRC ensures that all affiliates and other third parties that are retained to perform services on JRC's behalf and are provided with Personal Information are contractually required to observe the Electronic Privacy Policy. It is a User's personal responsibility to secure a User's own copies of any logins, passwords and related access codes used on or for the Web Site.

Please note, security risks on the Internet cannot be eliminated and JRC cannot and does not guarantee that a User's personal information will not be disclosed in ways not otherwise described in the Electronic Privacy Policy.

### **How may a User access and correct Personal Information?**

Upon written request, JRC will provide a User with any Personal Information to the extent required by law.

If a User believes that any of the Personal Information collected by JRC relating to a User is incorrect or incomplete, please write or send an electronic message to JRC's Privacy Officer, as provided above.

### **Other Matters**

#### Former Users

If a User ceases using the Web Site, or a User's access to the Web Site has been terminated, JRC may continue to use and disclose a User's Personal Information in accordance with the Electronic Privacy Policy.

### Terms and Conditions of Use of Web Site

JRC's Terms and Conditions of Use governing a User's use of the JRC Web Site (which may be viewed by [clicking here](#)) contains important provisions, including provisions disclaiming, limiting, or excluding the liability of JRC for a User's use of the JRC Web Site and provisions determining the applicable law and exclusive jurisdiction for the resolution of any disputes regarding a User's use of the JRC Web Site. Each of those provisions applies to any disputes that may arise in relation to the Electronic Privacy Policy including any collection, use and disclosure of Personal Information and are of the same force and effect as if they had been reproduced directly in this Electronic Privacy Policy.

### Third Party Links and Web Sites

The Web Site may contain links to other third party web sites or Internet resources, which are not affiliated with the Web Site, provided by JRC and are not subject to the Electronic Privacy Policy. The User assumes any risk associated with any third party links or Web Sites. JRC assumes no responsibility or liability for, or control over any third party Web Sites or their collection, use and disclosure of a User's Personal Information.

### Children

JRC's Web Site are not intentionally designed for or directed at children under the age of majority.

### Electronic Privacy Policy Amendments

To accommodate amendments to the Web Site, changing technology, and legal developments, the Electronic Privacy Policy may be revised in JRC's absolute discretion and without any prior notice or liability to the User or any other person. JRC's collection, use and disclosure of the Personal Information through the Web Site will be governed by the version of the Electronic Privacy Policy in effect at that time when the information is collected, used, or disclosed. New versions of the Electronic Privacy Policy will be posted on the Web Site and will be available upon request from JRC. A User's continued access, use and/or dealings with the Web Site, after any amendments to the Electronic Privacy Policy, will signify a User's consent or continued consent to the

collection, use and disclosure of Personal Information in accordance with the revised Electronic Privacy Policy.