



Marilyn Morley Group Privacy Policy

OUR COMMITMENT TO PRIVACY

At our company, the Marilyn Morley Group we are genuinely committed to providing our clients with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, protecting their personal information is one of our highest priorities.

While we have always respected our clients, privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses may collect, use and disclose personal information. We will inform our clients, of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting clients, personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients, personal information and allowing our clients, to request access to, and correction of, their personal information.

SCOPE OF POLICY

This Policy applies to our collection, use and disclosure of your personal information. This Policy does not impose any limits on the collection, use or disclosure of business contact information and certain publicly-available information.

ACCOUNTABILITY

We take great care to ensure we are in full compliance with this Policy. You can connect with us in the event there are questions or concerns through our Home Page on our website.

INFORMATION COLLECTED

We may collect some or all of the following information directly from you, depending on your interactions with us and our website and services:

- your first and last name
- your home address, home telephone number, mobile phone number, personal e-mail address;
- products you have purchased or workshops you have attended or completed (including their dates and locations) – though note that we do not retain or store payment card information;
- Newsletter subscription
- surveys you have completed



Information that may be collected through our website and apps:

We or our service providers that help us maintain and operate our web site and mobile applications may also automatically collect the following information relating to your access to and use of our website and mobile applications through cookies, web beacons, and other technologies: your domain name; your browser type and operating system; your type of computer or mobile device; pages you view; links you click; your IP address; the length of time you visit or use our site or mobile apps; and the referring URL, or the webpage that led you to our site.

We may use various technological methods to track the patterns of users accessing and using our website and mobile apps, including the following methods:

Cookies: Cookies are small pieces of information that are stored by your browser on your computer or mobile device. We use cookies to enhance your experience on our site and apps. Cookies in themselves do not identify an individual user, just the computer or device used. Users may have the opportunity to set their computers or devices to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. If you set your browser not to accept cookies, you may not be able to take advantage of the full features of our site or apps.

Web Beacons: Web beacons are small pieces of data that are embedded in images on the pages of websites. We may use these technical methods to analyze the traffic patterns on our site, such as the frequency with which our users visit various parts of our site. These technical methods may involve the transmission of information either directly to us or to another party authorized by us to collect information on our behalf. We may also use these technical methods in HTML e-mails that we send to determine whether you have opened those e-mails or clicked on links in the e-mails. The information from use of these technical methods may be collected in a form that is not personally identifying.

Third-Party Analytics: We may use automated devices and applications, such as Google Analytics, to evaluate usage of our site and our apps. We also may use other analytic means to evaluate our services. We use these tools to help us improve our services, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. You may opt-out of Google Analytics by downloading and installing the Google Analytics Opt-Out Add-on for your web browser.

Click Stream Data: When you use, read, browse or download information from our website and apps, we or our service providers may also collect information such as the date, time and duration of a visit, information about your location, the pages accessed, the IP address of your computer, and any information downloaded.

Third-Party Ad Networks: We may use third parties such as network advertisers to serve advertisements on our site and app and on third-party websites or other media (e.g., social networking platforms). This lets us and these third parties to target advertisements to you for products and services in which you might be interested. Third-party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this one. We may provide these third-party advertisers with information, including Personal Information, about you.

Third-Party Content (e.g., social media links): Some of the content on our website and apps may include applications made available by third parties, which could include social media buttons or links that allow you to share content or links to our website and apps through the relevant third-party platforms. These third-party applications themselves may facilitate the collection of information by those third parties, through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third-party websites to understand their privacy practices and options they may make available to you in relation to their collection of your personal information.

PURPOSES



When collecting personal information, we will state the purpose of collection.

We collect, use and disclose your personal information for the following purposes:

- to provide and administer products and services you request, and to disclose the information for any purpose related to the provision of requested products and services;
- to authenticate your identity;
- to provide personal information to third-party suppliers of products and services (as discussed in more detail below);
- to maintain accurate customer records;
- to protect us, yourself and others from fraud and error and to safeguard our business interests;
- to collect debts owed to us;
- to comply with legal and regulatory requirements
- to distribute to third parties, including financial institutions, payment processors, and government licensing bodies for any of the above purposes.

The collections, uses and disclosures listed above are a reasonably necessary part of your relationship with us. We may also collect, use and disclose your personal information as follows:

- we may use your personal information to offer additional or alternate products and services to you and may add your personal information to customer lists for this purpose; and
- we may share your personal information with suppliers and third parties so that they may offer their products or services to you.

You may instruct us to refrain from using or sharing your personal information for any of the two purposes described above at any time by providing written notification to us. We acknowledge that the sharing of your personal information for any of those two purposes is at your option and we will not refuse you access to any product or service merely because you have instructed us to stop using or sharing your personal information in those ways.

When your personal information is to be used for a purpose not previously identified, we will disclose that the new purpose to you before such use, and we will seek your consent unless the use is authorized or required by law.

CONSENT

We will obtain your consent to collect, use or disclose personal information except where we are authorized or required by law to do so without consent.

Your consent can be express, implied or given through an authorized representative such as a lawyer, agent or broker. Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify us that you do not wish your personal information collected/used/disclosed for various purposes after you have received notice of those purposes) or otherwise.

You may withdraw consent at any time, subject to legal, contractual and other restrictions, provided that you give us reasonable notice of withdrawal of consent. If you notify us that you withdraw consent, we will inform you of the likely consequences of that withdrawal, which may include our inability to provide certain services for which that information is necessary.

LIMITS ON COLLECTION OF PERSONAL INFORMATION

We will not collect personal information indiscriminately but will limit collection of personal information to that which is reasonable and necessary. We will also collect personal information as authorized by law.



LIMITS FOR USING, DISCLOSING AND RETAINING PERSONAL INFORMATION

Your personal information will only be used or disclosed for the purposes set out above and as authorized by law.

We will keep personal information used in making a decision affecting you, for at least one year after using it to make the decision.

We will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for a legal or business purpose.

We will take due care when destroying personal information so as to prevent unauthorized access to the information.

SERVICE PROVIDERS

We may retain agents, subcontractors or service providers from time to time in relation to our business or the products or services that we provide. If we require a service provider to deal with your personal information, we will take reasonable steps to ensure that the service provider adheres to privacy procedures and will keep your personal information confidential. We will not provide more information than is necessary to the service provider and will ensure that the information is returned or destroyed once the purpose for which it was given is filled.

Our service providers may be located outside of Canada, and you acknowledge that personal information may be processed and stored in foreign jurisdictions with different (and perhaps weaker) privacy laws, and that the governments, courts or law enforcement or regulatory agencies in those jurisdictions may be able to obtain disclosure of that personal information through the laws of the foreign jurisdiction.

ACCURACY

We will make every reasonable effort to ensure that personal information we are using, or disclosing is accurate and complete.

If you demonstrate that personal information is inaccurate or incomplete, we will amend the information as required. If appropriate, we will send the amended information to third parties to whom the information has been disclosed.

SAFEGUARDING PERSONAL INFORMATION

We protect the personal information in our custody or control by making reasonable physical, organizational and electronic security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

We will take reasonable measures, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by the suppliers and agents who assist in providing services.

Note that confidentiality and security are not assured when information is transmitted through e-mail or other wireless communication.

PROVIDING ACCESS

You have a right to access your personal information that we hold.



Upon written request and authentication of identity, we will provide you your personal information under our control. We will also give you information about the ways in which that information is being used and a description of the individuals and organizations to whom that information has been disclosed. We may charge you a reasonable fee for doing so.

We will make the information available within 30 days of receiving a written request or provide written notice where additional time is required to fulfil the request.

In some situations, we may not be able to provide access to certain personal information (e.g., if disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purposes of an investigation or where disclosure of the information would reveal confidential commercial information that could harm our competitive position). We may also be prevented by law from providing access to certain personal information.

Where an access request is refused, we will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

COMPLAINTS

Any inquiries, complaints or questions regarding this Policy should be directed in writing to us through the Connect With Us tab on our website www.mytop5.ca or by calling 778.822.5675