

PRIVACY POLICY

The website <https://www.eiadvantage.ca/> (the “**Site**”) is operated by **9627316 Canada Ltd. o/a EI ADVANTAGE** (also referred to as “**EI**”, “**us**”, or “**we**”). We respect your right to control your personal information. That is why we have developed this privacy policy (the “**Privacy Policy**”) which describes:

- the types of personal information we collect about you;
- the purposes for which we collect that information;
- how we use that information;
- with whom we share that information;
- how we safeguard that information;
- the choices available to you regarding how we use your personal information; and
- how you can contact us about our privacy practices.

This page contains the Privacy Policy for the Site, as well as for any other websites or microsites operated by EI (collectively and together with the Site, the “**Sites**”), and for web applications, tools, forums, or social media pages offered by EI on the Sites, and for any online services offered by EI including, but not limited to, any executive and leadership coaching, leadership development courses and programs, mentor coaching, certification programs, client and/or team assessment services, education, training, and facilitation services, and team and group coaching offered online by EI (together with the Sites, the “**Service**”).

By accessing or using the Service, you consent to the collection, use and disclosure of personal information by EI in accordance with the Privacy Policy. You may choose not to provide us with personal information. However, if you make this choice we may not be able to provide you with the application, service or information that you requested.

We recommend that you read this entire Privacy Policy to ensure that you are fully informed. However, you can access specific sections of the Privacy Policy based on the type of information you are looking for by clicking on the links below.

1. [What are the key defined terms used throughout the Privacy Policy?](#)
2. [What personal information do we collect?](#)
3. [What is the purpose of the collection of your personal information?](#)
4. [To whom do we disclose your personal information?](#)
5. [What if there is a change in the initial purpose of collection of your personal information?](#)
6. [Do we knowingly collect personal information about children?](#)
7. [How do we safeguard your personal information?](#)
8. [Do we transfer your personal information to third parties for storage or processing?](#)
9. [How long do we retain your personal information?](#)

10. [How do we ensure the accuracy of your personal information?](#)
11. [What types of “cookies” and/or other technologies do we use?](#)
12. [What type of analytics services do we use and for what purpose? How can you disable analytics?](#)
13. [What is our basis for processing your personal information and what are your rights if you are located in the European Economic Area?](#)
14. [Who do you contact if you have an inquiry, complaint, or want to request a review of your personal information?](#)
15. [How do we handle complaints?](#)
16. [How do you withdraw your consent to the collection, use or disclosure of your personal information?](#)
17. [How can you unsubscribe from our commercial electronic messages such as messages regarding new products or services?](#)
18. [If changes are made to the Privacy Policy, will you be notified? If so, how will you be notified?](#)

1. Definitions

For the purposes of the Privacy Policy, the following words have the following meanings:

“**collection**” means the act of gathering, acquiring, recording or obtaining personal information from any source, including third parties, by any means.

“**consent**” means voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative, such as a parent or guardian. Express consent is permission that is granted by an individual taking a positive step to signify consent and may be given orally, electronically or in writing. Implied consent is the assumption of consent that can reasonably be inferred from a user's action or inaction.

“**user**” means an individual who uses the Service provided by EI, including anyone else who accesses or visits the Sites.

“**disclosure**” means making personal information available to a third party.

“**employee**” means an employee of EI, and for the purpose of the Privacy Policy only, includes agents, independent and other contractors performing services for EI.

“**personal information**” means information about an identifiable individual, but not aggregated information that cannot be associated with a specific individual.

“**registered user**” means a user who has created and registered an account with EI, as well as a Subscribing Organization that has created and registered an account or accounts with EI.

“Subscribing Organization” means a company, entity or organization, including any business that has subscribed to the Service.

“Supervisory Authority” means an independent public authority that is responsible for monitoring compliance with the General Data Protection Regulation.

“third party” means an individual other than the user, or the user's agent, or an organization outside EI or a Subscribing Organization.

“use” means the treatment, handling and management of personal information by and within EI.

[return to questions](#)

2. Information We Collect

When you interact with us through the Service, we may collect or receive the following types of information.

Personal Information You Provide To Us

You may provide us with your personal information in different ways. For example, we may collect any or all of the following personal information if the information is reasonably required to provide the services accessed or requested by you:

- (a) information that you provide when you become a registered user or otherwise complete forms on the Service, such as your name, company name email address, postal address, telephone number, age, country of residence and occupation/title;
- (b) your log-in and password details in connection with your EI account(s), including your username;
- (c) your correspondence with EI employees, including any questions, concerns or comments you may have about the Service or problems that you report;
- (d) comments, videos, photographs, and any other content or information that you may post or submit to the Service; and/or
- (e) details of your requests made through the Service.

EI does not collect information related to method of payment such as a credit or debit card number. All purchases of EI products and services will be directed to and handled by third parties such as Apple, Stripe, Shopify or Paypal. You will be bound by the privacy policies of these third party sites

Technical Information We Collect Automatically

When you visit the Sites, we may collect, using electronic means, technical information. This information may include:

- (a) the IP address of your computer and which browser you used to view our Sites;

- (b) operating system;
- (c) resolution of screen;
- (d) location;
- (e) language settings in browsers; and/or
- (f) the site you came from and searched for keywords if arriving from a search engine.

This technical information (some of which in certain instances may be considered personal information) is aggregated and used to measure and improve effectiveness of our Sites. We do not attempt to combine this technical information with other personal information we collect on our Sites. [return to questions](#)

3. Purpose of Collection and Use of Personal Information

EI collects your personal information and will use your personal information as is reasonably required for the following purposes:

- (a) if you are a registered user, to establish and maintain your EI account;
- (b) to provide web applications, the Service, and/or the other services or information that you request;
- (c) to verify your identity if you submit comments, videos, photographs, opinions, or any other content or information to the Service;
- (d) to respond to questions, comments, requests, job applications, or complaints that you submit to EI;
- (e) to collect amounts owing from you to EI, if applicable;
- (f) to track communications with you;
- (g) to analyze use of the Service and to improve the Service;
- (h) to send emails, newsletters, regular mail or other communications you have consented to receive from EI;
- (i) to provide Service-related announcements or notifications to you;
- (j) to fulfill a purpose that we disclose to you when we request your personal information;
- (k) to aggregate your personal information resulting from the combination and/or aggregation of certain raw personal information collected from you with other data in a way that no longer personally identifies you; and/or
- (l) to meet legal and regulatory requirements.

EI staff are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. Personal information will only be collected and used by authorized staff in a manner consistent with the activities of EI. [return to questions](#)

4. Disclosure of Personal Information

EI may disclose your personal information to:

- (a) its employees, agents, partners and service providers as is reasonably necessary to enable these parties to perform a business, professional or technical support function for EI;
- (b) a person who, in the reasonable judgment of EI, is seeking the information as your agent; and
- (c) a third party or parties, where you consent to such disclosure or the disclosure is permitted or required by law.

Corporate Reorganization and Business Transfers

We may also disclose your personal information in connection with a corporate re-organization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to the same, provided that the information disclosed continues to be used for the purposes permitted by the Privacy Policy by the entity acquiring the information. [return to questions](#)

5. Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and obtain your express consent to do so pursuant to Section 18.

Please note that we may process your personal data without your knowledge or consent where this is required by law . [return to questions](#)

6. Children

The Service is intended for general audiences and is not directed to children under the age of 16. We do not knowingly collect personal information from children under 16. In the event that we learn that we have collected personal information from a child under the age of 16, we will take appropriate steps to delete that personal information. If you become aware or believe that a child has provided us with personal information, please contact us as provided in Section 14.

[return to questions](#)

7. Safeguarding Your Personal Information

EI is committed to safeguarding your personal information. EI uses appropriate security measures to protect personal information against risks such as loss or theft, unauthorized access, disclosure, copying, misuse, modification or destruction, and any other unlawful form of processing of the personal information in our possession regardless of the format in which it is held. The methods of protection and safeguards used by EI include, but are not limited to, locked

filing cabinets, security testing, vulnerability scans, need-to-know access and technological measures, including the use of passwords, encryption and firewalls.

EI also ensures that its employees with access to personal information are made aware of the importance of maintaining the confidentiality of personal information.

EI takes care in disposing of or destroying personal information to prevent unauthorized parties from gaining access to the information.

We cannot ensure or warrant the security of any personal information we collect either directly or automatically from you, and you do so at your own risk. We also cannot guarantee that such personal information may not be accessed, disclosed, altered, or destroyed by breach of any of our security safeguards. To the degree that personal information is of a sensitive nature, and in the event of a breach, there may be a risk of significant harm to you which includes bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, financial loss, identity theft, negative effects on the credit record and damage to or loss of property.

[return to questions](#)

8. International Transfers

Your personal information may be stored and processed in any country where we engage third party service providers (e.g. Canada, United States). While such information is outside of your country of residence, it is subject to the law of the country in which it is held, and may be subject to disclosure to the governments, courts, or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. However, our practices will at all times continue to be governed by the Privacy Policy.

EI has measures in place to ensure that when your personal information is transferred internationally, it is subject to appropriate safeguards in accordance with data protection laws. These measures typically include contractual safeguards stipulating the confidentiality of the information and the purposes for which it is to be used. [return to questions](#)

9. Retention of Personal Information

EI will only keep personal information for as long as reasonably necessary to fulfil the relevant purposes set out in the Policy Privacy and in order to comply with our legal and regulatory obligations. To determine the appropriate retention period for your information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of your information, the purposes for which we process your information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We may also retain aggregated non-identifiable personal information indefinitely after your account has been closed for research or statistical purposes.

Please note, if you are a registered user and your EI account becomes inactive, EI may choose not to retain your personal information associated with your EI account, or any other records associated with your EI account, for a period longer than three years after your EI account becomes inactive, in which case such information may be destroyed. If your EI account becomes

inactive, you are solely responsible for exporting any such information from your EI account that you may wish to retain. [return to questions](#)

10. Accuracy

EI is committed to keeping your personal information as complete, up-to-date and accurate as is necessary for the purposes for which it is to be used. EI will promptly correct or complete any personal information found to be inaccurate or incomplete. Where appropriate, EI will transmit amended information to third parties having access to the personal information in question. Upon request, EI will provide you with a reasonable opportunity to review the personal information in your file to review its accuracy. Such personal information will be provided within a reasonable time of the request and at a minimal or no cost to you.

Also upon request, EI will provide an account of the use and disclosure of your personal information and, where reasonably possible, will state the source of the information. In providing an account of disclosure, EI will provide a list of organizations to which it may have disclosed personal information about you when it is not possible to provide an actual list. [return to questions](#)

11. Cookies and Similar Technologies

The Sites use “cookies”, which are small text files placed on your computer or other device when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information.

We also use third party cookies which enable features or functionality provided by third parties in connection with the Service, for example, advertising, interactive content, and analytics (see Section 12 below). The parties that set these third-party cookies can recognize your device both when it visits the website in question and also when it visits certain other websites.

We use the following types of cookies:

- (a) **Strictly necessary / technical cookies** that are essential to enable you to move around a website and use its features. Without these cookies, the Service cannot be provided.
- (b) **Analytical / performance cookies** that collect information in aggregated form about how users interact with the Sites so that you may improve functionality.
- (c) **Functional cookies** that allow a website to remember choices you make, recognize you when you return and to personalize content.
- (d) **Targeting / advertising cookies** that track browser habits and used to deliver targeted (interest-based) advertising.

Managing Cookies

You can manage website cookies in your browser settings, and you always have the choice to change these settings by accepting, rejecting, or deleting cookies. If you choose to change your settings, you may find that certain functions and features will not work as intended on the Service. All browser settings are slightly different, so to manage cookies, you should refer to the relevant settings within your browser.

Other Technologies

We may use other technologies similar to cookies like web beacons, which are sometimes called "tracking pixels" or "clear gifs". These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited the Sites or opened an email that we have sent them. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning. [return to questions](#)

12. Analytics

The Sites employ Google Analytics, a web analysis service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses "cookies," which are text files placed on your computer, to help the website analyze how users use the Sites, compiling reports on the Sites' activity for the Sites' operators and providing other services relating to website activity and Internet usage. The information generated by the cookie (including the IP address) is transferred and stored on a Google server located in the United States.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other information held by Google.

We may also use additional analytics programs from time to time to process non-personal information about you.

We make no attempt to link this non-personal information with the identity of individuals using the Service. Non-personal information may be permanently archived for future use in any manner whatsoever by EI.

Disable Google Analytics

You can prevent the collection and processing of cookie created data relating to your utilization of the Sites (including your IP) via Google by downloading and installing the browser-plugin available under the following link (<https://tools.google.com/dlpage/gaoptout?hl=en>).

Google currently offers this opt-out tool for Internet Explorer 11, Google Chrome, Mozilla Firefox, Apple Safari and Opera.

Further information concerning the terms and conditions of Google's use and data privacy can be found at <https://www.google.com/analytics/terms/us.html> or <https://policies.google.com/privacy>.

[return to questions](#)

13. Additional European Economic Area Disclosures

Our Role as Data Controller and Data Processor

EI generally acts as the data controller of your personal information submitted through the Sites.

If you are situated in the European Economic Area ("EEA") and have any complaints regarding our privacy practices as data controller, you have the right to make a complaint at any time to your local Supervisory Authority. We would, however, appreciate the chance to deal with your concerns before you approach your Supervisory Authority so please contact us as provided under

Section 14. If you are situated in the EEA and have a complaint, please contact our Privacy Officer us as provided under Section 14.

Legal Basis for Processing Your Personal Information

Our legal basis for collecting and using personal information described in the Privacy Policy will depend on the personal information concerned and the specific context in which we collect it. Below are the types of lawful basis that we may rely on to process your personal information:

Legal Basis for Processing	Explanation of Legal Basis
Consent	<p>You have given consent to us for the processing of your personal information for one or more specific purposes. Where we rely upon consent, you may withdraw your consent to the collection, use or disclosure of personal information by us by providing notice in accordance with Section 14 and subject to the provisions of Section 16.</p> <p>If you withdraw your consent, this will not affect the lawfulness of our use of your personal information prior to the withdrawal of your consent, nor will it affect processing of your personal information conducted lawfully on grounds other than consent.</p>
Legitimate Interest	<p>Processing your personal information to enable us to provide and improve the Service to you, administer our relationship with you and our business, for marketing and in order to exercise our rights and responsibilities. Where we rely on legitimate interests as a lawful ground for processing your personal information, we balance those interests against your interests, fundamental rights and freedoms.</p> <p>You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at as provided under Section 14.</p>
Performance of a Contract	<p>Processing your personal information where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.</p>
Comply with a legal or regulatory obligation	<p>Processing your personal information where it is necessary for compliance with a legal or regulatory obligation that we are subject.</p>

Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

Your Personal Information Rights

If you are situated in the EEA, you have the following rights:

Right	Explanation of Right
Right of Access	The right to ask us if we are processing your personal information, to make a written request for details of your personal information and a copy of that personal information.
Right to Rectification	The right to have inaccurate information about you corrected or removed.
Right to Erasure (‘Right to be Forgotten’)	The right to have certain personal information about you erased.
Right to Restriction of Processing	The right to request that your personal information is only used for restricted purposes. Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. However, please note that withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted lawfully on grounds other than consent.
Right to Automated Decisions	The right to contest any automated decision made where such a decision is based solely on automated processing, which produces legal effects which concern or significantly affect you, unless you have expressly consented to it or it is necessary for entering into, or performance of, an agreement for the provision of services to you or otherwise authorized by applicable law.
Right to Object	The right to object to processing of your personal information in cases where our processing is based on the performance of a task carried out in the public interest or we have let you know the processing is necessary for our or a third party’s legitimate interests.

Right to Data Portability	The right to ask for the personal information you have made available to us to be transferred to you or a third party in machine-readable format.
Right to Withdraw Consent	The right to withdraw any consent you have previously given us to handle your personal information. If you withdraw your consent, this will not affect the lawfulness of our use of your personal information prior to the withdrawal of your consent, nor will it affect processing of your personal information conducted lawfully on grounds other than consent.

To exercise any of these rights, please contact us as provided in Section 14. These rights are not absolute and they do not always apply in all cases.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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 in order to help us respond efficiently to your request.

You will not have to pay a fee to access your personal information (or to exercise any of the above 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.
[return to questions\](#)

14. Contact Us

To submit an inquiry, complaint, request a review of your personal information, correct or update your personal information, withdraw your consent or request more information or additional copies of the Privacy Policy contact:

EI Privacy Officer

Mailing Address:

EI ADVANTAGE
201-1600 Kenaston Blvd, Suite 311
Winnipeg, Manitoba R3P 0Y4

Telephone No.: 1.204.891.7884

E-mail: janice@eiadvantage.ca

[return to questions](#)

15. Complaints

EI will promptly investigate all complaints concerning our compliance with the Privacy Policy and our dealings with your personal information. If a complaint is found to be justified, EI will take appropriate measures to resolve the complaint, including, if necessary, amending our policies and

procedures. You will be informed of the outcome of the investigation regarding your complaint.
[return to questions](#)

16. Withdrawing Consent

You may withdraw your consent to the collection, use or disclosure of your personal information by EI at any time, subject to legal or contractual restrictions and reasonable notice. In certain circumstances, your withdrawal of consent may result in the inability of EI to continue providing aspects or optimization of the Service to you. Please contact EI for more information regarding the implications of withdrawing consent. [return to questions](#)

17. Unsubscribe from Commercial Electronic Messages

If you no longer wish to receive commercial electronic messages from EI regarding our new products or services, promotions or other similar communications, you may unsubscribe [here](#). Please note that, after you unsubscribe, EI may still send electronic communications to you in certain limited circumstances, such as to provide you with Service notifications and billing information, or to provide information that EI is legally obligated to provide you. [return to questions](#)

18. Privacy Policy Changes

We may modify the Privacy Policy to accommodate changes in our services, changes in technology and legal developments. If we make changes to the Privacy Policy, we will provide notice through the Service, or by other means to provide you the opportunity to review the changes before they become effective. For example, we may place a prominent notice on the Sites or e-mail you to let you know of an updated Privacy Policy.

If we make significant changes to the Privacy Policy, we will provide at least 30 days' notice through the Service, or by other means, to provide you the opportunity to review the changes and provide your required consent before they become effective. A significant change may be using personal information for a new purpose or disclosures to new third parties.

You acknowledge that your continued use of the Service after we modify the Privacy Policy, publish or send a notice about our changes to the Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy.

If you object to any changes to the Privacy Policy you may close your account.

Whenever we update the Privacy Policy, we will change the date below to indicate when the changes were made.

[return to questions](#)

Date: April 1, 2020