

# INTELOCATE PRIVACY POLICY

Last Revision: October, 2015

Intelocate is committed to the privacy of its customers, event attendees and online users. This Privacy Policy covers how Intelocate uses personal information that users provide via the Intelocate website, tools, products and services offered to users by Intelocate, courses (if and as applicable), and Intelocate events. (together hereinafter “Services”). By using any of the Services you accept the terms of our Privacy Policy.

## Contact Person for Privacy and Personal Information Queries and Concerns

The Privacy Coordinator at Intelocate is accountable for Intelocate’s policies and practices, with respect to the management of personal information, and is the individual to whom your complaints and inquires can be forwarded.

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## How We Collect and Use Your Information

The information that Intelocate collects about you can be classified as Personal Information and Anonymous Information. Personal Information refers to information that identifies you as a person (e.g. your name, postal address, phone number, email address, payment details). Personal Information will also include “personal information” as that term is defined in the *Personal Information Protection and Electronic Documents Act (Canada)* (“PIPEDA”). Anonymous Information refers to information that does not identify a specific individual.

## Personal Information

In order to effectively deliver those services to you, it is necessary to collect, use and disclose certain information from you, including Personal Information. We collect your email address when you register for use of or participation in a Service. As well, if you request a meeting via the Intelocate website, we may also collect such information as your name, postal address, phone number, credit card and other billing information required for payment, as well as your IP address(es).

We may use your Personal Information to respond to an email or other inquiry or request, to help improve the Services, to customize your experience at the Intelocate websites or to send updates or notices about the Intelocate Services. We also use your Personal Information to bill you for the Services subscriptions and other charges and for administration associated with billing and collection of any overdue accounts. In the event Intelocate's billing functions are assumed by a third-party billing service, we have taken reasonable steps to ensure that they abide by or have in place a substantially similar privacy policy. We may use your Personal Information in the event you provide us with a testimonial or other comments which would reasonably enhance the reputation and business prospects of Intelocate.

In providing Intelocate with Personal Information, you agree that Intelocate may use this information only for the intended purpose or to fulfill contractual obligations and terms. Intelocate may collect, use, transfer and disclose any information that is not Personal Information for any purpose without requiring your consent. You can choose not to provide Personal Information Intelocate may request from you, but in general, the Personal Information requested is required in order to provide the Services and the lack of such Personal Information will render Intelocate unable to provide some or all of its Services to you. By registering or signing up with Intelocate, you consent to the use of Personal Information by Intelocate as set out in this Privacy Policy.

## **Anonymous Information**

Every time you visit the Intelocate website, Intelocate collects certain technical information from your visit via 'cookies' a small data file that is stored on a user's computer to enable the Service to recognize a user that previously used the Service. This includes the pages that were visited and returned to, the time spent on the website by a visitor, the operating system, the referring site and any keywords used to find the website or service on search engines. This information does not contain any reference to your Personal Information. This information can only be accessed by Intelocate and can be used with the sole purposes of tracking visits, analysis of aggregate data, marketing, improving user experience, quality of service, content and layout of the website.

For greater clarity, Intelocate does reserve the right to perform statistical analyses of user behaviour and characteristics, in order to measure interest in and use of the various sections of its sites so as to improve design and navigation and to gather marketing information. Only Anonymous Information will be used for this purpose.

Any visitor can browse the Intelocate website with cookies turned 'off' on their browser, but if you are subscribed to the Service and you wish to log in to your Service account, your web browser must accept cookies. A cookie/session variable is assigned to you when you log in, and is placed on your computer for programming purposes only. This ensures that you have properly logged in and that your personal information is only accessible to you. Your web browser settings can be customized to refuse cookies and/or to remove them from your computer. If you have no problem accepting cookies, but wish to be informed of their appearance, you may turn on a warning prompt by modifying the cookie warning section in Edit/Preferences/Advanced.

## **How We Share Your Information**

Privacy of our users is very important for Intelocate. We shall not sell or rent your Personal Information to any third party without your prior consent. We shall share your Personal Information with the third parties only if such information is required to provide you with specific Services which you wish to obtain or participate in, or at your request, and only that Personal Information which you permit to be so disclosed.

Intelocate may permit select third parties to access specific information if they are contractually bound to an event involving Intelocate at which you have indicated an interest in attending or participating in (e.g. event organizers, sponsors, partner charity). Authorized third parties may contact event registrants and event attendees by electronic means only, and will not automatically enroll registrants/attendees in any mailing list without the necessary consent required under Canadian Anti-SPAM Legislation (CASL).

Intelocate may disclose Personal Information to conform to legal requirements or to respond to a subpoena, search warrant or other legal process received, or otherwise required by law.

Email Communications from Intelocate:

Intelocate is committed to keeping your email address confidential. We shall use users email addresses exclusively to communicate Intelocate information. Users can unsubscribe to Intelocate emails at any time by selecting the ‘unsubscribe’ link provided in the footer of each email, or by writing to [yulia@intelocate.com](mailto:yulia@intelocate.com)

## **How We Protect Your Information**

Once we received any information from you, Intelocate shall make all reasonable effort to ensure the security of our systems. Please note that this is not a guarantee that unauthorized entry or use, hardware or software failure and other factors that may at any time compromise the security of user information, will not happen.

Photography and Filming of Intelocate Events and Courses:

During Intelocate events (including any interactive webinars or video conferences), any person in attendance may be photographed or filmed as part of the occasion, either as an individual or as a member of a group. An individual may also appear in a photograph or video inadvertently, in the background. If for any reason users/attendees do not wish to be filmed or photographed please inform on-site management staff or inform us by way of a chat request or via email prior to the commencement of any such event or activity.

Intelocate may provide a blog to which you may post reviews or information, in doing so you acknowledge and agree that any such information, including Personal Information, is thereafter public and not subject to this policy. Intelocate will in no way be liable for or responsible for any third party’s collection, use or further disclosure of information disclosed by you in this fashion nor for any content posted by you, including any unauthorized disclosure of anyone else’s Personal Information.

## Other PIPEDA-Related Privacy Provisions

It is the policy of Intelocate to control the collection, use, and disclosure of personal information in accordance with all requirements set out in PIPEDA and/or any applicable provincial legislation. In certain circumstances personal information may be collected, used, or disclosed without the knowledge and consent of the individual. Exemptions include, but are not limited to personal information gathered for:

- Legal, medical, or security reasons.
- Detection and prevention of fraud or for law enforcement.
- Journalistic, artistic or literary purposes if its use is confined to those purposes.

### Requirements

The following requirements shall be met by Intelocate unless exempted by PIPEDA.

1. **Accountability**  
Intelocate is responsible for personal information under its control and shall designate a Privacy Coordinator to be accountable for Intelocate's compliance with PIPEDA.
2. **Identifying Purposes**  
The purposes for which personal information is collected shall be identified by Intelocate at or before the time the information is collected.
3. **Consent**  
The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, excepting only circumstances prescribed in PIPEDA.
4. **Limiting Collection**  
The collection of personal information shall be limited to that which is necessary for the purposes identified by Intelocate and further consent must be obtained from an individual for any further collection of personal information.
5. **Limiting Use, Disclosure and Retention**  
Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.
6. **Accuracy**  
Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used, provided the individual has provided accurate, up-to-date and correct information to Intelocate.
7. **Safeguards**  
Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.
8. **Openness**  
Intelocate shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.
9. **Individual Access**  
Upon request, an individual shall be informed of the existence, use, and disclosure of his

or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

10. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for Intelocate's compliance.

### **Responsibility**

- All Intelocate employees, who collect, maintain and/or use personal information, are responsible for insuring that the collection, use and disclosure of this information is carried out in accordance with this policy and relevant procedures.
- The Privacy Coordinator is responsible for supervising compliance with the legislation and for initiating procedures, guidelines and schedules that will be developed to effect this policy.
- The Privacy Coordinator is accountable for Intelocate's policies and practices, with respect to the management of personal information, and is the individual to whom complaints and inquiries can be forwarded.

### **Changes in Privacy Policy**

Your use of the Services, including any dispute concerning privacy, is subject to this Privacy Policy. Intelocate reserves the right to modify this Privacy Policy from time to time and such modifications shall be effective upon posting them on the website. You agree to be bound by any changes to this Privacy Policy when you use the Services after any such modification is posted. It is, therefore, important that you review this Privacy Policy regularly to ensure you are updated of any changes.