

## **TORONTO HAKOMI PRIVACY POLICY**

Last updated July 13, 2021

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### **INTRODUCTION**

Hakomi Education Network Toronto (“we” or “us” or “our”) respects the privacy of our users (“user” or “you”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website TorontoHakomi.org and our mobile application, including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the “Site”). Please read this privacy policy carefully. If you do not agree with the terms of this privacy policy, please do not access the site.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Site after the date such revised Privacy Policy is posted.

### **COLLECTION OF YOUR INFORMATION**

We may collect information about you in a variety of ways. The information we may collect on the Site includes:

#### **Personal Data**

Personally identifiable information, such as your name, email address, and telephone number. You are under no obligation to provide us with personal information of any kind, however your refusal to do so may prevent you from using certain features of the

Site and our mobile application.

### **Derivative Data**

Information our servers automatically collect when you access the Site, such as your IP address, your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site. If you are using our mobile application, this information may also include your device name and type, your operating system, your phone number, your country, your likes and replies to a post, and other interactions with the application and other users via server log files, as well as any other information you choose to provide.

### **Financial Data**

Financial information, such as data related to your payment method (e.g. valid credit card number, card brand, expiration date) that we may collect when you purchase or request information about our services from the Site or our mobile application. We store only very limited, if any, financial information that we collect. Otherwise, all financial information is stored by our payment processor, Affinipay, and you are encouraged to review their privacy policy and contact them directly for responses to your questions.

### **Mobile Device Data**

Device information, such as your mobile device ID, model, and manufacturer, and information about the location of your device, if you access the Site from a mobile device.

### **Mobile Application Information**

If you connect using our mobile application:

- *Mobile Device Data.* We may collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.

## **USE OF YOUR INFORMATION**

Having accurate information about you permits us to provide you with a smooth and efficient experience. Specifically, we may use information collected about you via the Site or our mobile application to:

- Compile anonymous statistical data and analysis for use internally or with a third party such as our parent organization, Hakomi Education Network International.
- Create and manage your account.
- Deliver targeted advertising, updates and other information regarding our training opportunities and the Site and our mobile application to you.
- Email you regarding your account or order.
- Fulfill and manage purchases, orders, payments, and other transactions related to the Site and our mobile application.
- Notify you of updates to the Site and our mobile application.
- Perform other business activities as needed.
- Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
- Process payments and refunds.
- Request feedback and contact you about your use of the Site and our mobile application.

## **DISCLOSURE OF YOUR INFORMATION**

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

### **By Law or to Protect Rights**

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or

required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

### **Third-Party Service Providers**

We may share your information with third parties that perform services for us or on our behalf, including payment processing, email delivery, hosting services.

### **Affiliates**

We may share your information with our parent organization, in which case we will require the organization to honor this Privacy Policy.

### **Social Media Contacts**

If you connect to the Site or our mobile application through a social network, your contacts on the social network will see your name, profile photo, and descriptions of your activity.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

## **TRACKING TECHNOLOGIES**

### **Cookies and Web Beacons**

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site and our mobile application to help customize the Site and our mobile application and improve your experience. When you access the Site or our mobile application, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the Site or our mobile application. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or by modifying your

web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site and our mobile application to help customize the Site and our mobile application and improve your experience. For more information on how we use cookies, please refer to our Cookie Policy posted on the Site, which is incorporated into this Privacy Policy. By using the Site, you agree to be bound by our Cookie Policy.

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out cookies, plug-ins, or settings.

### **THIRD-PARTY WEBSITES**

The Site and our mobile application may contain links to third-party websites and applications of interest. Once you have used these links to leave the Site or our mobile application, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Site or our mobile application.

### **SECURITY OF YOUR INFORMATION**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be

guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

## **OPTIONS REGARDING YOUR INFORMATION**

### **Account Information**

You may at any time review or change the information in your account or terminate your account by:

- Logging into your account settings and updating your account
- Contacting us using the contact information provided below

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

### **Emails and Communications**

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Contacting us using the contact information provided below

## **CONTACT US**

If you have questions or comments about this Privacy Policy, please contact us at: [info@torontohakomi.org](mailto:info@torontohakomi.org).