



LivelyCo Media Inc Privacy Policy

We are committed to providing our current and prospective clients as well as subscribers with exceptional service. Providing this service involves the collection, use and disclosure of some personal and contact information, in which protecting is one of our highest priorities.

We only handle personal and contact information in a manner that a reasonable person would consider appropriate in the circumstances. Personal information means information about an identifiable individual and contact information means information that would enable an individual to be contacted. The information we may collect includes but is not limited to names, email addresses, home or business addresses, phone numbers, and social media contact information.

POLICY 1: COLLECTING PERSONAL INFORMATION

- 1.1 Unless the purposes for collecting personal information are obvious and the client or prospective client voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal or contact information is being collected, either orally, in writing, or electronically before or at the time of collection.
- 1.2 We will only collect information that is necessary to fulfill the following purposes:
 - To provide information about our services on a one-to-one basis in response to an inquiry
 - To sign you up for our newsletter
 - To be able to contact you about any promotions, contests, or services
 - To be able to register you for any of our events
 - To put you in touch with our clients for their services upon request
 - To collect payment information if you have agreed to our services
 - To conduct business with you
 - To collect payment for any business conducted

POLICY 2: CONSENT

- 2.1 We will obtain client or subscriber consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally, in writing, electronically, through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client or subscriber voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a client or subscriber is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising, or events and the client or subscriber does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients or subscribers can withhold or withdraw their consent for LivelyCo Media Inc to use their personal information in certain ways. A client or subscriber's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client or subscriber making the decision.
- 2.5 We may collect, use or disclose personal information without the client or subscriber's knowledge or consent in the following limited circumstances:
 - When the collection, use or disclosure of personal information is permitted or required by law
 - In an emergency that threatens an individual's life, health, or personal security
 - When the personal information is available from a public source (e.g., a telephone directory)
 - When we require legal advice from a lawyer
 - For the purposes of collecting a debt
 - To protect ourselves from fraud
 - To investigate an anticipated breach of an agreement or a contravention of law

POLICY 3: USING AND DISCLOSING PERSONAL INFORMATION

- 3.1 We will only use or disclose client or subscriber personal information where necessary to fulfill the purposes identified at the time of collection [*or for a purpose reasonably related to those purposes such as:*

- To conduct client, customer, member surveys in order to enhance the provision of our services given that they have given us permission to do so
 - To contact our clients and subscribers directly about products and services that may be of interest given that they have given us permission to do so
- 3.2 We will not use or disclose client or subscriber personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell client or subscriber lists or personal information to other parties [*unless we have consent to do so*].

POLICY 4: ENSURING ACCURACY OF PERSONAL INFORMATION

- 4.1 We will make reasonable efforts to ensure that client or subscriber personal information is accurate and complete where it may be used to make a decision about the client or subscriber or disclosed to another organization.
- 4.2 Clients or subscribers may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing electronically to info@livelyco.ca and provide sufficient detail to identify the personal information and the correction being sought.

POLICY 5: SECURING PERSONAL INFORMATION

- 5.1 We are committed to ensuring the security of client or subscriber personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 5.2 The following security measures will be followed to ensure that client or subscriber personal information is appropriately protected:
- Secure online drives
 - Our secure website (SSL Certificate Approved)
- 5.3 We will use appropriate security measures when destroying client or subscriber personal information such as deleting electronically stored information.
- 5.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.
- 5.5 We are not legally responsible if information is lost or stolen outside of these security parameters.

POLICY 6: PROVIDING CLIENTS AND SUBSCRIBERS ACCESS TO PERSONAL INFORMATION

- 6.1 Clients or subscribers have a right to access their personal information, subject to limited exceptions, which include but aren't limited to any information that would disclose the information about another individual, any health or safety concerns, and any legal purposes.
- 6.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. This can be directed in writing electronically to info@livelyco.ca.
- 6.3 Upon request, we will also tell clients or subscribers how we use their personal information and to whom it has been disclosed if applicable.
- 6.4 If a request is refused in full or in part, we will notify the client or subscriber, providing the reasons for refusal and the recourse available to the client or subscriber.

Should any clients or subscribers have any questions or concerns about LivelyCo Media Inc's Privacy Policy, he or she can direct questions to info@livelyco.ca.

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