

# LifeCourseOnline

## Privacy Policy

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### Background

LifeCourseOnline is a product of Sonderbloom Inc. headquartered at 2731 Dufferin St, North York, ON M6B 3R5 and (“LCO”, “we” or “us”).

LCO facilitates the collection, use, and disclosure of personal information (including personal health information) of individuals with disabilities by those individuals or by a support person or agency providing assistance to the individual (“caregiver”). LCO is not responsible for the privacy practices of caregivers.

This Privacy Policy explains our collection, use, disclosure, security, and retention of personal information. BY SUBMITTING PERSONAL INFORMATION TO LCO, YOU AGREE THAT LCO MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW.

## What is Personal Information?

Personal information is information about an identifiable individual, whether alone or in combination with other information. This means information is “personal information” when it can be used to identify you.

## Personal Information We Collect

We collect the following personal information. We provide a list of examples of the types of personal information collected on the LCO platform to help you understand what information we collect and why. The examples below are not exhaustive, meaning that we may collect more personal information than the types specifically mentioned in the chart below.

Most of the personal information we collect is collected from you and/or your caregiver and/or your team member<sup>(c)</sup>, and is totally voluntary. This means that you are not required to share all this personal information on our platform in order to access and use the LCO platform.

In the chart below, we also explain why we collect personal information (Purpose) and who we share that information with (Sharing). We provide all this information so that you are clear about what personal information we collect and what happens to that personal information.

Types of information	Source	Purpose	Sharing
Profile data such as name, birthdate, photo, username, password	You and/or your caregiver and/or your team member	Open your account and verify your identity Manage account information Connect you with relevant members of	none

Types of information	Source	Purpose	Sharing
		your community, with your consent	
Contact data such as residential address, email address, phone number, contact information for your network of support	You and/or your caregiver and/or your team member	Communicate with you and your caregiver, if applicable, about your account, new services or features, and other service-related issues	None
<p>Personal health data such as information about the physicians involved in your care, your medications, sleep monitoring and other information you choose to post</p> <p>You may decide to link your account to devices such as a sleep or step monitoring</p>	<p>You and/or your caregiver and/or your team member</p> <p>Third party wellness app should you choose to connect one to your account</p>	<p>Organize and store personal health information that is important to you</p> <p>Help you track sleep and/or exercise, if you choose</p> <p>Help you manage your medications and other medical and non-medical treatments and supports</p> <p>Facilitate health planning</p>	None
<p>Financial data such as your budget plans and financial management</p> <p>We do not collect payment information. Rather, we rely on a third-party service provider to process all payments. We retain the last 4-digits of your credit card for the purpose of verifying your identity and preventing fraud</p>	You and/or your caregiver and/or your team member	<p>Help you develop and manage a personal budget</p> <p>Help you set, track, and achieve financial goals</p> <p>Facilitate payment processing associated with your account</p>	Third party payment processor

<b>Types of information</b>	<b>Source</b>	<b>Purpose</b>	<b>Sharing</b>
Interests and opinions such as your vision, your personal goals and plans, network of contacts, schedule, favorite places to explore, reviews and comments you may contribute to your LCO platform	You and/or your caregiver and/or your team member	Allow you to record your preferences, comments, opinions Help you record and track plans, goals, visions Organize your preferred places	Team members or other LCO users, if you choose to make your opinions, interests, reviews public
Event data such as any webinars or courses you may register for ongoing education and skills training	You and/or your caregiver and/or your team member	Register you for events of your choosing Conduct analytics on event participation Understand your preferences when accessing or attending events	None
Browsing data such as the websites you visited before coming to LCO, the information you looked at while on the LCO website, the links you clicked on	Third party data analytics sources	Improve business services Improve our operations Provide more tailored recommendations based on your preferences	Google Analytics

<sup>(\*)</sup> Team members can include personal support workers, family members, or other non-caregivers who provide assistance

Personal information does not include information that is de-identified or aggregated such that it cannot identify you. We may use de-identified and/or aggregated data for purposes including to improve our services, test our systems, develop new services, develop business intelligence reports and conduct data analysis on our systems and users. We may share this anonymized and aggregated information with third parties. By using our services, you agree that LCO may de-identify your personal information for the purposes consistent with this policy.

## **Sharing your Personal Information**

We may share your data for the following legitimate purposes:

### **Service Providers**

We may employ third-party service providers (e.g. back-end data analysis, data security monitoring and assessment, payment processors, etc.) to facilitate or provide certain services on our behalf, such as to process payments, provide user support, perform App or Website-related services (e.g., without limitation, maintenance services, database management, web analytics and improvement of the Website's features) or to assist us in analyzing how our service is used.

These third parties have access to your personal information only to perform these tasks on our behalf and are contractually bound not to disclose or use it for any other purpose.

### **Sale of Business**

We may transfer any information we have about you as an asset in connection with a proposed or completed merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of LCO or as part of a corporate reorganization or other change in corporate control.

### **Legal Requests**

LCO and other service providers may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to an organization in the case of a breach of an agreement or contravention of law, or as otherwise required or permitted by applicable laws.

LCO may also disclose your personal information to the extent that this is legally required or necessary for the establishment, exercise or defence of legal claims and legal process; to investigate or prevent actual or suspect loss or harm to persons or property; to detect, prevent or suppress fraud; or in the event of an emergency pertaining to your health and/or safety; or to our auditors, legal advisors, and other professional advisors.

## **Cookies and Similar Technologies**

Our website uses Google Analytics to help analyze how users use the site. The tool uses "cookies" which are small text files placed on your computer, to collect anonymous

standard Internet log information and visitor behavior information. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity.

LCO only uses essential and persistent cookies to track browsing behavior on our website only. If you wish, you may opt out of being tracked by Google Analytics by disabling or refusing the cookies, by disabling JavaScript within your browser or by using the Google Analytics Opt-Out Browser Add-On. Disabling Google Analytics or JavaScript will still permit you to access comparable information or services from our website.

Link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

## **Minors and Persons under Legal Disability**

LCO may be used by caregivers on behalf of minors or persons under legal disability (i.e., lacking legal capacity to consent on one's own behalf). Minors under the age of 16 or persons under legal disability are not permitted to register with or use LCO or provide personal information without a caregiver.

If you are a caregiver and you are contributing personal information, including personal health information, to LCO on behalf of a minor or a person under legal disability, you confirm that you have the legal authority to make such contributions.

## **Data Retention**

We will retain personal information only as long as necessary to fulfill the purpose for which it was collected or as otherwise permitted or required by applicable laws. Your personal information will be de-identified, aggregated and/or securely deleted once it is no longer needed to fulfill the purpose for collection.

Any personal information that is provided during the registration process that does not result in an active account is automatically deleted from our servers.

## **Safeguards**

We take appropriate technical, physical and organizational security measures to protect personal information in our custody and control against unauthorized access, use, modification and disclosure, and accidental loss, destruction and damage. For example, we use standard, industry-wide, commercially reasonable security practices such as encryption, firewalls and SSL (Secure Socket Layers) as well as physical safeguards at the

locations where data is stored. However, as effective as encryption technology is, no security system is impenetrable.

We cannot guarantee the security of our database or that the information you contribute to your LCO account will not be intercepted while being transmitted to us over the Internet. Any transmission of information by you to LCO is at your own risk. Where you have chosen a password that allows you to access our platform, you are responsible for keeping this password confidential. We strongly recommend that you do not share your password with anyone.

### **Third-party links**

LCO may contain links to other sites that we do not own or operate. Except as provided in this Privacy Policy, we will not give any of your personal information to these third parties without your consent. We provide links to third-party websites as a convenience. These links are not intended as an endorsement of or referral to the linked websites.

The linked websites have separate and independent privacy statements, notices, and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

### **International Transfers**

LCO may transfer your personal information outside the jurisdiction in which you reside in order to process or store that information. When your personal information is transferred internationally, it is subject to foreign laws that may be less stringent than the laws applicable in your jurisdiction.

LCO undertakes to protect your personal information that is transferred internationally through the use of contractual or other acceptable arrangements that seek to impose rigorous privacy and data security practices. By providing us your personal information, you understand and agree to these international transfers.

### **Legal Rights**

Subject to certain limitations and depending on the privacy laws applicable to you, you may have the following legal rights to your personal information:

1. Right to openness about our collection, use and disclosure of your personal information. You have the right to be informed in a manner that is clear, transparent and accessible.
2. Right to access or correct your personal information held by us.
3. Right to delete or remove certain of the personal information held by us.
4. Right to request that we restrict the processing of your personal information.
5. Right to object to certain processing of your personal information, including the right to object to marketing, and request that your personal information be moved to a third-party. You can object by changing your marketing and email preferences, disabling cookies, and opting out at any time from allowing further access by us to your location data by updating settings on your device.
6. Right to obtain your personal information in an accessible and transferable format so that you can re-use it for your own purposes with other service providers.

Where we rely on your consent to process personal information, you may have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object (as noted above).

Right to receive non-discriminatory treatment for choosing to exercise your rights under applicable privacy legislation.

You have the right to lodge a complaint about the way we handle or process your information with the national data protection authority. For more information about your rights or to lodge a complaint, please visit the data protection authority in your jurisdiction.

## **Changes to this Privacy Policy**

LCO reserves the right to modify or supplement this Privacy Policy at any time. If we make any material change to this policy, we will update this site to include such changes.

Your continued use of this site after we post such notice of change to this policy will constitute your acceptance of the new terms and their application to your use of this site and the information disclosed for such use.

A print version of LCO's Privacy Policy can be requested from Madeleine Tuer at [Madeleine.Tuer@sonderbloom.com](mailto:Madeleine.Tuer@sonderbloom.com)



## Challenging Compliance

A challenge concerning compliance with our privacy practices as described in this policy should be made to the Privacy Officer at: Madeleine Tuer at [Madeleine.Tuer@sonderbloom.com](mailto:Madeleine.Tuer@sonderbloom.com) If we are unable to resolve your concerns, you may also contact the data protection authority where you reside.