

## **Privacy Policy**

### **8-Elements Commitment to Protecting Your Privacy**

Protecting the security and privacy of your Personal Information is important to 8-Elements and to the way we conduct our business in compliance with laws on privacy, data protection and data security in Canada. We hope the policy outlined below will help you understand what information 8-Elements may collect, how 8-Elements uses and safeguards that information and with whom we may share it.

### **Acceptance of Terms of Privacy Policy and Consent to the Use of Your Personal Information**

BY ACCESSING, USING AND/OR DOWNLOADING MATERIALS FROM THIS SITE OR BY SUBMITTING PERSONAL INFORMATION TO 8-ELEMENTS, YOU AGREE, ON YOUR OWN BEHALF AND ON BEHALF OF EACH ENTITY ON WHOSE BEHALF YOU ACT, THAT 8-ELEMENTS MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW. YOU UNDERSTAND THAT IN ORDER TO ACCESS THE COURSES OFFERED BY 8-ELEMENTS YOU ARE REQUIRED TO USE CERTAIN THIRD PARTY RESOURCES INCLUDING THINKIFIC, STRIPE AND PAYPAL. PLEASE ALSO REFER TO THE PRIVACY POLICIES OF THOSE THIRD PARTIES.

Please note that this site is also governed by the Terms of Use as outlined on our web site [www.8-elements.com](http://www.8-elements.com) . We urge you to review the Terms of Use before proceeding further on this site.

What information do we collect?

How do we use your information?

How do I obtain access to my information?

How do we protect your information?

What if we change our Privacy Policy?

Website links

Challenging Compliance

### **What information do we collect?**

#### **Non-Personal Information Collected Automatically**

When you access our web site, we may automatically (i.e., not by registration) collect information that is not personally-identifiable (e.g., type of Internet browser and computer operating system used; domain name of the web site from which you came; number of visits, average time spent, pages viewed; search terms used and search analytics). We may use this information within 8-Elements and with our registered agents, dealers and distributors (“affiliates”) to measure the use of our web site and improve its content.

## "Cookies" - Information Placed Automatically on Your Computer

When you view our web site, we may store some information on your computer in the form of a "Cookie" to automatically recognize you the next time you visit. Cookies can help us in many ways, for example, by allowing us to tailor a web site to better match your interests or to save your password so that you do not have to re-enter it each time. If you choose not to be recognized, please refer to your Internet browser to erase Cookies from your computer hard drive, block all Cookies or receive a warning before a Cookie is stored.

## Personal Information

Through our web site, 8-Elements will not collect any personally-identifiable information about you (e.g., your name, address, telephone number or e-mail address ("Personal Information")), unless you voluntarily choose to provide it to us (e.g., by registration, product order, survey, through one of our password-protected areas or by your specific request for information through our "Contact Us" link). If you do not want your Personal Information collected, please do not submit it to us.

## Children

No Personal Information should be submitted to the 8-Elements web site by children without the consent of their parent or guardian. 8-Elements' encourages all parents or guardians to instruct their children in the safe and responsible use of their Personal Information while using the Internet. 8-Elements will not knowingly collect or use any Personal Information collected from children for any purpose whatsoever, including disclosure to third parties.

## How do we use your information?

### Purposes and Consent

When you do provide us with Personal Information, we use it to respond to your inquiry, process your registration, or provide you access to specific information. Also, to support our customer relationship with you:

- we may store and process Personal Information and share it with our partners to better understand your learning needs, how we can improve our classes and products; or

- we may use Personal Information to contact you about a 8-Elements offer in support of your further learning or to conduct online surveys to understand better our customers' needs and profile.

If you choose not to have your Personal Information used to support our customer relationship (especially direct-marketing or market-research), we will respect your choice. We do not now (and do not intend to) sell, rent or otherwise market your Personal Information to third parties. We limit the collection, use, retention and disclosure of your personal information to that which is reasonably necessary for these purposes. By using this Site or submitting personal information to 8-Elements, you consent to our collection from, verification with, and communication to any third party for these purposes. You consent to the collection, use, disclosure and processing of your information by 8-Elements and its affiliates, and their respective agents and service providers, for the purposes set out in this Privacy Policy.

Ordinarily we ask for consent to collect, use or disclose personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

You may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our reasonable business or legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

The purpose for collecting personal information is set out in this policy. Any necessary consent's shall be obtained before personal information is collected, used or disclosed.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask customers and contacts to provide their consent orally (in person, by telephone), in writing (by signing a consent form), or electronically (by clicking a button).

In cases that do not involve sensitive personal information, we may rely on "opt-out" consent. The amount and type of personal information collected by 8-Elements shall be limited to what is necessary to fulfill the identified purpose. Personal information shall only be used or disclosed for the purposes for which it is collected. Exceptions may be made with the consent of the individual or if authorized or required by law.

Personal information collected by 8-Elements or on behalf of 8-Elements will be sent to 8-Elements' head office in Calgary Alberta and will be subject to the laws of Canada.

**Please note that we use cloud-based services to store information. Where personal information is stored or processed outside of Canada, it is subject to the laws of that foreign jurisdiction, and may be accessible to that jurisdiction's governments, courts or law enforcement or regulatory agencies.**

#### **How do I obtain access to my information?**

Upon request received by 8-Elements in writing, individuals shall be informed of the existence, use, and disclosure of their personal information records and shall be given access to that information. Requests to access personal information held by 8-Elements should be directed to 8-Elements' Privacy Officer.

Requests must be made in writing or by e-mail. Individuals may be required to verify their identity in order to access their personal information. Any such documentation provided shall be used for verification purposes only.

8-Elements responds to requests for access to personal information within thirty (30) days of receipt of the request, or as may be permitted in accordance with applicable privacy legislation.

A fee for reasonable costs incurred may be charged when responding to more complex requests. The individual will be informed of the applicable fee.

Requested information will be provided in a form that is generally understandable.

8-Elements will be as specific as possible when describing third parties to whom it has disclosed personal information about an individual. When it is not possible to provide a list of the organizations to which it has actually disclosed information, 8-Elements will provide a list of organizations to which it is likely to have disclosed information.

Individuals are permitted either to view the original record, or to request a copy, subject to limitations as permitted or required by law. To preserve the integrity of the record and ensure that documents are not removed from 8-Elements, individuals wishing to view an original record will do so at 8-Elements head office and under the supervision of designated 8-Elements personnel.

### **How do we protect your information?**

Personal information shall be kept as accurate, complete, and up-to-date as necessary for the purposes for which it is to be used.

Individuals have the right to challenge the accuracy and completeness of the personal information that is maintained by 8-Elements and have it amended as appropriate.

Individuals seeking a correction or amendment to their personal information should direct their requests in writing to 8-Elements' Privacy Officer.

All formal requests to amend personal information must be accompanied by appropriate supporting documentation. 8-Elements' Privacy Officer will manage any exceptions. The amended information will be transmitted to third parties, as appropriate.

If the individual is not satisfied with the results of the request, 8-Elements shall internally document the issue, and provide a response. The existence of the unresolved challenge will be transmitted to third parties, as appropriate.

Personal information will be retained only as long as necessary and will be disposed of in a manner that is appropriate to the sensitivity of the information. We render customer and contact personal information non-identifying, or destroy records containing personal information once the information is no longer needed. We use appropriate security measures when destroying customer and contact personal information, including shredding paper records and permanently deleting electronic records.

Personal information will be protected by security safeguards, appropriate to the sensitivity of the personal information.

We will notify the Office of the Information and Privacy Commissioner of Alberta, without delay, of a security breach affecting personal information if it creates a real risk of significant harm to individuals.

### **What if we change our privacy policy?**

8-Elements' reserves the right to modify or supplement this Privacy Policy statement at any time. If we make any material change to this Privacy Policy, we will update this Site to

include such changes and post a notice on our home page with a link to the updated Privacy Policy. Please read any such notice and the new policy statement. Your continued use of this Site after we post such notice will constitute your acceptance of the new terms and their application to your use of this Site and the information disclosed for such use, including information previously furnished us, as if they were the initial terms. However, we will seek your consent if we want to use your personal information for purposes other than those you have agreed to previously.

### **Website links**

This Site may contain links to other websites, including, but not limited to, those of our payment processing source provider, distributors and business partners. While we try to link only to websites that share our high standards and respect for privacy, please understand that we are not responsible for the content of the privacy practices employed by other websites.

### **Challenging Compliance**

Inquiries or complaints concerning compliance with this Privacy Policy should be addressed, in writing, to 8-Elements' Privacy Officer.

If you are not satisfied with the response from our Privacy Officer after making a complaint, you may have recourse to additional remedies under applicable privacy legislation. For further information, please contact the Federal Privacy Commissioner or your provincial Privacy Commissioner, as applicable.

### **Questions and Complaints**

If you have a question or concern about any collection, use or disclosure of personal information by 8-Elements, or would like to request access to your own personal information, please contact:

Privacy Officer:

Matt Buxton  
[info@8-elements.com](mailto:info@8-elements.com)

If, after our Privacy Officer has received your concern you remain dissatisfied, you then have the right to contact the Office of the Information and Privacy Commissioner by mail, e-mail or telephone.