

WEBSITE PRIVACY

1. OVERVIEW

Upper Canada Creative Child Care Centres of Ontario, our affiliates and subsidiaries (UCCC) respect website user privacy and are committed to protecting it in compliance with this policy. This policy describes how UCCC collects, uses, discloses, and protects the personal information of website users in accordance with federal legislation. It details the types of information that may be collected or that may be provided when individuals visit www.uppercanadachildcare.com (UCCC website). It also describes UCCC's practices for collecting, using, maintaining, protecting, and disclosing that information.

2. REVIEW AND CONSENT

- 2.1 Website users should read this policy carefully to understand UCCC's policies and practices for collecting, processing, and storing website user's information.
- 2.2 If a website user does not agree with UCCC's policies and practices, it is their choice to not use the UCCC website. By accessing or using this website, the website user indicates that they understand, accept, and consent to the practices described in this policy.
- 2.3 This policy may change from time to time. Continued use of the UCCC website after UCCC makes changes indicates that the website user accepts and consents to those changes. Website users are advised/encouraged to check the policy periodically for updates.

3. SCOPE

- 3.1 This policy applies to information UCCC collects, uses, or discloses about website users:
 - 3.1.1 on the UCCC website,
 - 3.1.2 in email, text, and other electronic messages between website users and the UCCC website; and
 - 3.1.3 through mobile and desktop applications website users download from the UCCC website, which provide dedicated non-browser-based interaction between website users and this website.
- 3.2 This policy **DOES NOT** apply to information that:
 - 3.2.1 UCCC collects offline or through any other means, including on any other company or third-party website; or that
 - 3.2.2 website users provide to or is collected by any third party [(including our affiliates and subsidiaries)], through any application or content (including advertising) that may link to or be accessible from [or on] the UCCC website].

4. DEFINITIONS

- 4.1 **Personal information**

Privacy laws in Canada generally define "personal information" as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person. Personal information does not include business contact information, including a website user's name, title, or business contact information.

5. RESPONSIBILITIES

- 5.1 **Privacy Officer**

UCCC has appointed a Privacy Officer to oversee compliance with this *Website Privacy Policy*. UCCC welcomes questions, comments, and requests regarding this policy and UCCC privacy practices. UCCC has procedures in place to receive and respond to complaints or inquiries about its handling of personal information, its compliance with this policy, and with applicable privacy laws. To discuss UCCC's compliance with this policy, individuals may contact UCCC's Privacy Officer at: **privacyofficer@ucccc.ca** or by mail:
Attn: Privacy Officer
Upper Canada Child Care
498 Markland Street, Unit 5
Markham, ON L6C 1Z6

6. POLICY

- 6.1 **Information UCCC Collects about Website Users**

UCCC collects and uses several types of information from and about website users, including:

- 6.1.1 Personal information** that UCCC reasonably uses to directly or indirectly identify website users, such as their name, mailing address, e-mail address, telephone number, Internet protocol (IP) address used to connect computer to the Internet, user name or other similar identifier and any other identifier UCCC may use to contact individuals (see definition above).
- 6.1.2 Non-personal information** that does not directly or indirectly reveal an individual's identity or directly relate to an identifiable individual, such as their region, engagement levels, demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but UCCC may derive non-personal statistical or aggregated data from personal information. For example, UCCC may aggregate personal information to calculate the percentage of users accessing a specific UCCC website feature.
- 6.1.3 Non-personal details** about UCCC website interactions, including the full Uniform Resource Locators (URLs), clickstream to, through, and from the UCCC website (including date and time), products viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, or any phone number used to call UCCC service number.
- 6.2 How UCCC Collects Information about Website Users**
UCCC uses different methods to collect information, including through:
- 6.2.1 Direct interactions with website users when they provide information to UCCC**
(E.g. by filling in forms or corresponding with UCCC by phone, email, or otherwise)
- 6.2.2 Automated technologies or interactions**
As website users navigate through our UCCC website, information collected automatically may include usage details, IP addresses, and information collected through cookies.
- 6.2.3 Information Website User Provides to UCCC**
The information UCCC collects directly from a website user, on or through the UCCC website may include:
- 6.2.3.1** information (e.g. name and email) provided by the user by filling in forms on the UCCC website; and
- 6.2.3.2** records and copies of correspondence (including email addresses), if a website user contacts UCCC.
- 6.2.4 Information UCCC Collects Through Cookies and Other Automatic Data Collection Technologies**
As website users navigate through and interact with the UCCC website, cookies or other automatic data collection technologies may be used to collect certain information about website user equipment, browsing actions, and patterns, including:
- 6.2.4.1** details of website user visits to the UCCC website, including traffic data, location data, logs, and other communication data and the resources that were accessed and used on the website; and
- 6.2.4.2** information about a website user's computer and internet connection, including IP address, operating system, and browser type.
- 6.2.5** The information UCCC collects helps to improve the website and to deliver a better and more personalized service, by enabling UCCC to:
- 6.2.5.1** estimate audience size and usage patterns,
- 6.2.5.2** store information about website user preferences, allowing customization of our Website according to individual interests,
- 6.2.5.3** speed up website user searches; and
- 6.2.5.4** recognize website users when they return to the UCCC website.
- 6.2.6** The technologies UCCC uses for automatic data collection may include:
- 6.2.6.1 Cookies (or browser cookies):** A cookie is a small file placed on the hard drive of a website user computer. The system will issue cookies when a website user directs their browser to the UCCC website, unless the website user has adjusted their browser setting so that it will refuse cookies. However, this may result in the user being unable to access certain parts of the UCCC Website.
- 6.2.6.2 Flash Cookies:** Certain features of the UCCC website may use locally stored objects (or flash cookies) to collect and store information about user preferences and navigation to, from, and on the website.
- 6.3 How UCCC Uses Website User Information**

- 6.3.1 UCCC uses information collected about/provided by website users, including any personal information:
 - 6.3.1.1 to present the UCCC website and its contents to website users,
 - 6.3.1.2 to provide the information, products, or services requested by the website user from UCCC,
 - 6.3.1.3 to fulfill the purposes for which a website user provided the information or that were described when it was collected, or any other purpose for which the website user provided it,
 - 6.3.1.4 to notify website users about changes to the UCCC website or any products or services UCCC offers or provides through the website,
 - 6.3.1.5 to improve the UCCC website, products or services, marketing, client relationships; and
 - 6.3.1.6 in any other way UCCC may describe when website user provide the information; or for any other purpose with website user consent.

- 6.3.2 UCCC may use the information collected from website users for the purpose of displaying advertisements to our advertisers' target audiences. Even though UCCC does not disclose website user personal information for these purposes without website user consent, if a website user clicks on or otherwise interacts with an advertisement, the advertiser may assume that the user meets its target criteria.

6.4 Disclosure of Website User Information

- 6.4.1 UCCC may disclose accumulated information about our users, and information that does not identify any individual, without restriction.

- 6.4.2 UCCC may disclose personal information collected from or provided by website users as described in this privacy policy:

- 6.4.2.1 to our subsidiaries and affiliates,
- 6.4.2.2 to contractors, service providers, and other third parties UCCC uses to support our business (such as analytics and search engine providers that assist with website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which it is intended, and process the personal information with the same standards set out in this policy,
- 6.4.2.3 to fulfill the purpose for which the website user provided it,
- 6.4.2.4 for any other purpose disclosed by UCCC when a website user provided the information; and
- 6.4.2.5 with website user consent.

- 6.4.3 UCCC may also disclose website user personal information:

- 6.4.3.1 to comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law,
- 6.4.3.2 to enforce or apply our terms of use; and
- 6.4.3.3 if UCCC believes disclosure is necessary or appropriate to protect the rights, property, or safety of Upper Canada Child Care, our clients, or others.

6.5 Transferring Website User Personal Information

- 6.5.1 UCCC may transfer personal information collected from and/or provided by website users as described in this policy to contractors, service providers, and other third parties used to support our business (such as analytics and search engine providers that assist with UCCC website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which it is intended, and process the personal information with the same standards set out in this policy.

- 6.5.2 UCCC may process, store, and transfer website user personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to website user personal information through the laws of the foreign country. Whenever UCCC engages a service provider, UCCC requires that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

- 6.5.3 By submitting website user personal information or engaging with the UCCC website, website users consent to this transfer, storage, or processing.

6.6 Choices about How UCCC Uses and Discloses Website User Information

- 6.6.1 UCCC strives to provide website users with choices regarding the personal information they may provide to UCCC. UCCC has provided website users with the following information to have control over their information:

- 6.6.1.1 **Tracking Technologies and Advertising**

Website users may set their browser to refuse all or some browser cookies, or to alert website user when cookies are being sent. If a website user disables or refuses cookies, please note that some parts of the UCCC website may not be accessible or may not function properly. Flash cookies are not managed by the same browser settings that are used for browser cookies. Individuals may manage flash cookies by visiting the Flash Player Settings Page on the Adobe website.

6.7 Data Security

- 6.7.1** The security of website user personal information is very important to UCCC. UCCC uses physical, electronic, and administrative measures designed to secure website user personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.
- 6.7.2** The safety and security of website user information also depends on the website user. Where UCCC has given a website user (or where website user has chosen) a password for access to certain parts of our website, website users are responsible for keeping this password confidential. UCCC asks website users not to share their password with anyone.
- 6.7.3** Unfortunately, the transmission of information via the Internet is not completely secure. Although UCCC strives to protect website user personal information, UCCC cannot guarantee the security of website user personal information transmitted to our website. Any transmission of personal information is at the user's own risk. UCCC is not responsible for the circumvention of any privacy settings or security measures contained on the UCCC website.

6.8 Data Retention

- 6.8.1** Except as otherwise permitted or required by applicable law or regulation, UCCC will only retain website user personal information for as long as necessary to fulfill the purposes UCCC collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 6.8.2** Under some circumstances UCCC may anonymize website user personal information so that it can no longer be associated with website user. UCCC reserves the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to or consent from website users.

6.9 Accessing and Correcting Website User Personal Information

- 6.9.1** It is important that the personal information UCCC holds about website users is accurate and current. Please keep UCCC informed if personal information changes. By law, website users have the right to request access to and to correct any personal information that is held by UCCC.
- 6.9.2** UCCC may request specific information from website users to help UCCC confirm their identity and right to access, and to provide users with the personal information that UCCC holds about them, or to make user requested changes. Applicable law may allow or require UCCC to refuse to provide a website user with access to some or all of the personal information that UCCC currently holds or may have destroyed, erased, or made website anonymous in accordance with our record retention obligations and practices. If UCCC cannot provide a website user with access to their personal information, UCCC will inform them of the reasons why, subject to any legal or regulatory restrictions.

6.10 Withdrawing Consent

Where a website user has provided consent to the collection, use, and transfer of their personal information, they may have the legal right to withdraw their consent under certain circumstances. To withdraw consent, if applicable, the website user may contact the privacyofficer@ucccc.ca. If the website user withdraws consent UCCC may not be able to provide the website user with a particular product or service. The privacy officer will explain the impact to the website user at the time to help with their decision.