



## Privacy Policy

Last updated: September 20, 2023

### Overview

This Privacy Policy describes how LIVNorth collects and uses personal information about you through the use of our website, and through other dealings and communications between you and LIVNorth.

At **LIV North Inc.** (collectively, “**LIVNorth**”, “**we**”, “**us**” or “**our**”), we take pride in how we manage and protect personal information about users of our website and our other online platforms (collectively, the “**website**”), and others who submit their personal information to us (collectively, “**you**” or “**your**”). We provide transparency about our Privacy Policy (“**Policy**”) by publishing details about the Policy on our website. This Policy explains how LIVNorth collects, uses and discloses your personal information.

This Policy applies to information we collect from you in any way, including through our website, by email and other electronic messages, when you contact us by telephone, when you submit your information to any of our representatives in person, and when you interact with our advertising and applications on third-party websites and services, if those applications or advertising direct you to this policy.

This Policy does not apply to any information that is anonymous or does not allow an individual to be identified.

This Policy does not apply to personal information about LIVNorth employees, employment candidates, contractors, applicants, or consultants.

### 1. Application

#### a) *What Is Personal Information?*

This Policy applies to information that identifies a person or could be reasonably associated with them.

“**Personal information**” is any information that identifies you or could be reasonably associated with you. Personal information can include contact information such as your name, email address, home address, country of residence and contact phone numbers, information provided to us in connection with our products and/or information collected automatically when you interact with us online, through our website, social media or otherwise.

Personal information does not include “business contact information” such as a person’s name, job title, business address, or business telephone number, which are used in the context of their work within an organization.



b) *Personal Information of Children*

Our website is not intended for anyone under the age of majority. We will remove any information about a minor if we become aware of it.

Our website and activities are not directed to anyone under the age of majority, and we do not knowingly collect, maintain, or use personal information from children. If we become aware that we have collected the personal information of children, we will promptly take steps to delete such personal information. If you discover your child has provided us personal information without your consent, please contact us.

**2. How we collect personal information**

We collect the information we need in order to fulfill the purposes for which it is collected. We collect different types of information about you, including information that may directly identify you, information that is about you but individually does not personally identify you, and information that we combine with our other users.

Information is collected directly from you and through tracking technologies, and may also be obtained from third parties.

We limit the collection of personal information to what is reasonably required to fulfill the purposes for which it was collected.

We collect personal information in a variety of ways, from and about users of our website, including:

- information by which you may be personally identified, such as name, address, e-mail address, telephone number, banking or financial account information, credit or debit card number;
- information that is about you but individually does not identify you, such as traffic data, location data, logs, referring/exit pages, date and time of your visit to our website, error information, clickstream data, and other communication data and the resources that you access and use on the website; and/or
- information about your internet connection, the equipment you use to access our website and usage details, including mobile network, operating system, and browser.

This information is collected:

- directly from you when you provide it to us, for example through our website, when you are interacting with us through social media, when you contact us through call centers or other support and communication channels, when you have direct in-person contact with our representatives, or when you purchase products or services;



- automatically as you navigate through the website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies; and
- from others, for example, our affiliates, service providers, customers or insurance companies, which may enter your personal information.

### Browsing Data

As you navigate through and interact with our website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, specifically:

- **Usage and Equipment Information:** Information about your equipment, browsing actions, and patterns, for example, details of your visits to our website, such as traffic data, location, logs, referring/exit pages, date and time of your visit to our website, error information, clickstream data, and other communication data and the resources that you access and use on the website.
- **Device Information:** Information about your computer, mobile device, and Internet connection, specifically your IP address, domain names, operating system, browser type, and application version information.
- **Location Information.** Location information of your device.

### Automatic Tracking Technologies

The information we collect automatically may include personal information or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our website and to deliver a better and more personalized service by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences; and
- recognize you when you return to our website.

### Cookies

We may use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with our website through your computer or mobile device. A cookie is a small file placed on the hard drive of your computer or mobile device. Cookies enhance the convenience and use of our website.

The website may make use of "per session" and "persistent" cookie technology. Per session cookies track information during an open session and are stored only temporarily in your computer's memory. Persistent cookies are deposited on a visitor's computer until they expire or until the visitor deletes the cookies. Information from these cookies help LIVNorth analyze traffic patterns to the website, including the total number of visitors, the geographical location of the



visitor, and the types of Internet browsers and operating systems that the website's visitors use. LIVNorth uses this information to facilitate and enhance your online visits.

### Google Analytics

We use Google Analytics, a web analysis service of Google Inc. ("**Google**"). Google Analytics uses cookies to analyze your use of our website, to create reports about visitor activities and to provide further services associated with the use of our website and our online platforms. Although this information is collected through your Google ad settings, it is not provided to us in a personally identifiable format.

### Tracking Information

In addition, LIVNorth may use non-personal information to create aggregate tracking information reports regarding website user demographics and website traffic patterns, including for example Facebook Pixels and LinkedIn. If any such information is linked with website users' personal information, preferences, behaviour or characteristics, all of the linked information is treated as personal information and will be used and disclosed only in accordance with this Policy and applicable law.

## **3. How we use personal information**

We use your personal information for various authorized purposes, including to:

- provide our website and its contents to you;
- provide you with information;
- provide you with products and services;
- fulfill our contractual obligations and enforce our rights arising from contracts;
- notify you about changes;
- maintain and improve our website, products and services;
- respond to your inquiries and complaints; and
- any other purpose with your consent or as described when you provided the information.

We use personal information for the purposes identified at the time of collection, or as otherwise permitted or required by applicable law.

We use information that we collect about you or that you provide to us, including personal information:

- to present our website and its contents to you;
- to provide you with information or services that you request from us or as requested by a third party on your behalf or otherwise with your consent;
- to provide you with information, products, or services that you request from us or that may be of interest to you;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us;



- to notify you about changes to our website or any products or services we offer or provide through them;
- to maintain, secure, or improve our website, products and services;
- to respond to your questions, inquiries or complaints;
- to personalize and generally enhance your customer experience with us;
- in any other way we may describe when you provide the information;
- for any other purpose with your consent; and
- otherwise as may be permitted or required by law.

Your personal information is accessed and used only by those who require access to it in order to fulfill the foregoing purposes. Those who have access to it within our organization have a specific role to perform in respect of such purposes, and are made aware of the responsibilities applicable to them in their handling of personal information.

#### **4. Canada's Anti-Spam Law (CASL)**

We take measures to ensure we only communicate with you in ways you have accepted. If we have your consent to send you communications, we will use your contact information to do so, unless you withdraw your consent.

If you have withdrawn your consent, we may continue to communicate with you in relation to products or services you have purchased, or as may be otherwise necessary in the context of our relationship with you.

We take appropriate measures to ensure we only communicate with you in the manner that you have accepted. As such, we may request your express consent to communicate with you about our offers, promotions, products, services and opportunities that may be of interest to you.

If we have your consent to send you communications by email, text message or other means, we will use the contact information you have provided for these purposes in order to send them to you.

You can withdraw your consent to receive commercial electronic messages from us at any time by following the unsubscribe process described in any communication you receive from us. Your request will be honoured promptly and in accordance with applicable law. You can also adjust your preferences where applicable.

If you have withdrawn your consent to receive our communications through any particular means or with respect to any category of subject matter, we may continue to communicate with you in relation to products or services you have purchased, or in relation to your account or otherwise as may be required or permitted in the context of our relationship with you.

#### **5. How we share personal information**



We do not share, sell, or otherwise disclose your personal information except as outlined in this Policy and otherwise permitted or required by law.

We disclose your personal information to our affiliates.

We also disclose your personal information to a few third parties, including:

- our third-party service providers that we use to support our business;
- to comply with our legal obligations; and
- to enforce our rights.

We share personal information as described at the time of collection, or as otherwise permitted or required by applicable law.

Otherwise, we do not share, sell, or otherwise disclose your personal information for purposes other than those outlined in this Policy.

We may disclose personal information to our affiliates and to contractors, service providers and other third parties we use to support our business. These entities may provide IT and infrastructure support services, customer service, advertising, marketing, and payment processing services.

We may disclose aggregated information about our users, publicly available information, and information that does not identify any individual, without restriction.

a) *Transfers to Affiliates and Service Providers*

We may share your personal information within our group of companies or with third party service providers. We only do this when we are legally permitted to do so and when we have appropriate safeguards in place to protect your personal information.

We may share your personal information within the LIVNorth group of companies or with our service providers (companies operating on our behalf) for the purposes described in this Policy and in accordance with applicable law. We are committed to not selling your personal information to any organization or person.

When we may disclose or transfer your personal information to an affiliate or a third party to provide any services or perform a contract, we use appropriate measures to ensure that such party will only use your personal information to perform the functions specified by us.

b) *Transfers outside Quebec and Canada*

We may process your personal information outside of your home province or country, including in the United States. We only do this when we are legally permitted to do so and when we have appropriate safeguards in place to protect your personal information.



We are sometimes required to use service providers to store, handle or process personal information who may be located in the United States of America or elsewhere outside of the Province of Quebec or Canada. Accordingly, your personal information may be transferred throughout Canada or outside of Canada. The laws of those other places will then apply to that information, including laws that may permit or require disclosing that information to government, courts and law enforcement. In such cases, our policy is to require those parties to at all times provide adequate privacy protection to the information, by contractual or other means.

By using and accessing our website, you agree and consent to the transfer, processing, and storage of your personal information on servers which may be located outside of the province in which you reside.

## **6. Your consent**

We obtain your consent before collecting, using or disclosing your personal information, for specific purposes relating to the expected uses of the information.

Your consent may be withdrawn at any time.

We assume all information you submit is about you. Please do not submit personal information other than your own.

We obtain your consent before collecting, using, or disclosing your personal information, either in writing or verbally. In certain cases, your consent may be implied through your conduct.

By submitting personal information to us, you are providing your consent to the collection, use and disclosure of personal information for the purpose for which it is collected and as set out in this Policy, and as may be disclosed to you when the information is collected.

If you do not consent to the collection, use and disclosure of your personal information in accordance with this Policy, do not provide your personal information to LIVNorth.

Certain functionalities, products and services may not be accessible to you if you do not provide the required personal information.

Your consent may be withdrawn at any time, by contacting our Privacy Officer, subject to any legal and contractual requirements and reasonable notice.

If you provide personal information of another person, you represent and warrant that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Policy.

## **7. Choices about how we handle your personal information**

You can make certain choices about the way your personal information is used by us, and with respect to tracking technologies.



You can make certain adjustments to privacy settings on your browser and devices, as described below; however, they may impact your ability to use some of the features on our website.

You can also withdraw your consent to our use of your personal information at any time, by contacting the Privacy Officer.

### Cookies

Many internet browsers are initially set to accept cookies automatically. If you would prefer not to accept cookies, you can set your internet browser to notify you when your computer is receiving a cookie or to refuse cookies automatically. To readjust your internet browser's cookie options, please refer to the instruction documentation of your particular browser or seek online assistance.

### Google Analytics

You can opt-out of the use of Google Analytics by clicking on the following link: <https://tools.google.com/dlpage/gaoptout>.

### Tracking Technology

You may delete or disable certain settings of website tracking technologies at any time using your browser or device.

## **8. Data Storage**

We store your data in a secure manner.

Data may be stored outside your province of residence where such storage is permitted by law.

We hold the information we collect in electronic and/or paper form. Personal information is maintained at our offices or on our servers (or those of our service providers) and is accessible by authorized employees, representatives and agents who require access for the purposes described in this Policy.

Your personal information is stored in secured locations and on servers controlled by LIVNorth, located either at our offices or at the offices of our service providers or in the cloud, as applicable. Your personal information may be processed, accessed and/or stored in Quebec, elsewhere in Canada or in another jurisdiction, and will be subject to the laws of that jurisdiction. Please see item 5.b) above for more information in this regard.

## **9. Data Security**

We implement appropriate safeguards to ensure the protection of your personal information.

Information transmitted over the internet is not completely secure, but we do our best to protect your personal information.





We take the security of your personal information very seriously and are committed to protecting your privacy by employing security safeguards that are appropriate to the sensitivity of the information.

We have implemented administrative, technological and physical measures intended to safeguard personal information in our custody and control against theft, loss, and unauthorized access, use, modification, and disclosure. These measures include: restricting access to files containing personal information, firewalls, encryption, and other security software, password protection and organizational security policies.

The safety and security of your information also depends on you. Where you have chosen a username and password or other authentication credentials for access to certain parts of our website, you are responsible for keeping this information confidential. We ask you not to share this information with anyone.

Please note, however, that we cannot absolutely guarantee the security of any information transmitted to us or stored by us or on our behalf; you provide it at your own risk. While we take appropriate measures to protect personal information, there is always a risk that it may be lost, intercepted or misused, including by destructive programs.

## **10. Data Retention**

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected. We may also keep it to comply with other legal requirements.

We retain information for as long as necessary to fulfill the purposes for which we collected it.

We may also retain your personal information otherwise as permitted or required by applicable law, including for purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

Under some circumstances we may de-identify or anonymize your personal information so that it can no longer be associated with you. We may use de-identified or such anonymous data for any legitimate business purpose without further notice to you or your consent, including by aggregating it with other data.

We delete information securely as soon as reasonably practical after a valid deletion request, or after the end of the retention period described above.

## **11. User Generated Content**

When you submit content that can be accessed publicly, it may be used by others; we are not responsible for any such use.

Our services may, from time to time, contain interactive areas where you may submit comments or other content (including information about the user that might be displayed in the user's public profile within an online community) that may be visible to others. Users should be aware that when



they voluntarily disclose personal information in content submitted for posting or publication, the information can be read and used by others. This may result in unsolicited messages from other parties. We make no representations and undertake no obligations as to the security or use of information you voluntarily include when submitting content.

## **12. Third Party Websites and Social Media Platforms**

When you access third party websites through links on our website, their privacy policies will apply to any personal information made available to the operators of such websites; we are not responsible for privacy in this context.

When using social media platforms linked to our website, content and privacy matters are subject to the terms those platforms, and are not within our control or responsibility.

Our website may present links to other websites. Operators of linked websites may also collect your personal information and information generated through the use of cookies when you access their websites. LIVNorth is not responsible for how such third parties collect, use or disclose your personal information, so you should review their privacy policies before providing them with your personal information.

We make available on our website various social media plug-ins, including Facebook, Instagram, Pinterest and YouTube. You should be aware that any information you disclose while using these applications can be viewed, collected and used by other users of those social media platforms. We have no control over the information shared through these applications and therefore we are not responsible for the use, misuse or misappropriation by another user of any personal information you disclose while using these applications. For more information about social media plug-in policies and impact on your privacy rights, please consult the appropriate social media website's policies.

## **13. Access**

You are allowed access to your personal information upon request.

It is your responsibility to ensure that the personal information we have about you is accurate and up-to-date.

In accordance with applicable privacy laws, you have the right to access any personal information we hold about you, subject to any legal restrictions. Upon submission of a request, we will verify your identity or authority to make the request by a two-step verification process, and provide you with access to your personal information within a reasonable timeframe, in compliance with applicable laws. If any fees apply to providing you with extracts of our records of your personal information, you will be notified in advance.

It is your responsibility to provide accurate, correct and complete information. If you notice any errors in your personal information or need to update it, please let us know by contacting our Privacy Officer as outlined below.



## 14. Changes

We will post any changes to our Policy on our website. If we make material changes, we may notify you of such changes through your contact information and invite you to review the changes.

We may from time to time modify this Policy. We will promptly make any changes available on the website. If we make material changes to how we treat personal information, we will notify you by email and/or through a notice on the website home page.

By continuing to use our website, you accept the changes that are made to the Policy. It is your responsibility to ensure that you read, understand, and agree to the latest version of the Policy. The date at the top of the Policy indicates when it was last updated.

Please periodically visit our website and this Policy to check for any changes (and, where applicable, ensure we have an up-to-date email address for you).

## 15. Contact Information

You may contact our Privacy Officer at the contact information below.

Our Privacy Officer is responsible for overseeing our privacy program and ensuring compliance with applicable privacy laws and regulations.

If you have any concerns or complaints about how we handle your personal information or any privacy-related questions or requests, please contact our Privacy Officer:

**LIV North Inc.**  
7115 Tomken Road  
Mississauga, ON L5S 1R7  
Canada

Attention: Privacy Officer

Privacy@livnorth.com

Tel: 647 448 6067

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