



PRIVACY POLICY

Last updated: January 3, 2025

Welcome to the website (including any subdomain) operated by Thrive People Solutions Inc. (“**Company**”, “**we**”, “**us**” or “**our**” as the context dictates) and accessible at <https://thrivepeople.ca/>. We are committed to preserving the privacy of all individuals, including you (“**you**” or “**your**” as the context dictates), who use the Website to avail communication, collection, payment, content sharing and other features and benefits (“**Services**”). Accordingly, this privacy policy (this “**Privacy Policy**”) is designed to help you understand how your personally identifiable information (“**Personal Information**”) is collected, used, stored, and disclosed when you engage with us.

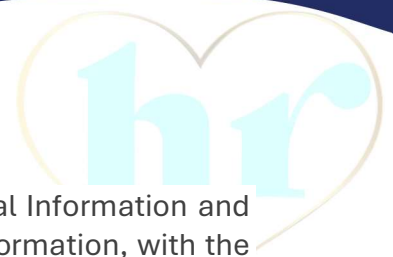
Before registering, submitting any content or Personal Information, or otherwise engaging with us on the Website, please make sure that you read and understand this Privacy Policy as well as our Terms of Use (together with such other documents, our “**Terms**”).

We respect your privacy and are committed to protecting the privacy and security of your personal information by complying with this Privacy Policy and with relevant privacy legislation including the *British Columbia Personal Information Protection Act*, the *Alberta Personal Information Protection Act* and the *Canadian Personal Information Protection and Electronic Documents Act*, as applicable.

This Privacy Policy applies to the Personal Information that we collect, use or disclose in the course of our commercial activities in Canada, including when you use our Services or submit information to us. Privacy laws in Canada generally define Personal Information as information about an identifiable individual or by which an individual’s identity can be deduced. We will only use your Personal Information for the purposes we collected it for. If we need to use your personal information for an unrelated purpose, we will provide notice to you and, if required by law, seek your consent. We may use or disclose your personal information without your knowledge or consent where required by applicable law or regulation.

In the course of engaging with us, you may also use a third party’s intellectual property, tool or resources (e.g., for payment processing such as Stripe) and such third party’s privacy policy may also apply to you. We encourage you to read and review each privacy policy that applies to you as our Privacy Policy terms may differ from the terms contained in third parties’ privacy policies. Notwithstanding any other sections of this Privacy Policy, Company shall not be responsible or liable, directly or indirectly, for any damage or loss suffered by you which is caused or alleged to be caused by or in connection with third





parties' privacy policies. You are under no obligation to provide Personal Information and you may choose not to provide us with some or all of your personal information, with the caveat that your refusal to do so may prevent you from using certain portions of our Services. Thrive People Solutions does not collect, use, store or disclose Personal Information without your consent, except as required by law or as set out below. You may withdraw your consent with respect to a particular use or disclosure of your personal information at any time by sending written instructions to the contact details contained herein. Except as required by law, we will cease the use or disclosure of your personal information in accordance with your instructions as soon as practicable.

If you have any objections to the terms in this Privacy Policy, you should not use our Services or provide us with any of your Personal Information, as by providing your Personal Information to us, you will be deemed to have consented to the processing of such data. If you have any hesitations or are unsure about any of the terms contained herein, we invite you to connect with us at the contact details provided below.

PART A – COLLECTION OF PERSONAL INFORMATION

Our collection of Personal Information is limited to that which is reasonable under the circumstances, and we only collect your Personal Information with your consent pursuant to our Terms.

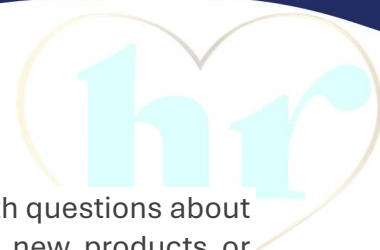
1. Information You Provide

1. Identity Data. We collect the Personal Information that you provide to us, which may include, but is not limited to: (i) basic Personal Information, including your first and last name, date of birth, contact information such as address and telephone number, payment information; (ii) information about your use of our Services; and (iii) analytical information, including, but not limited to, your login data, browser type and version, time zone setting and location, browser plug-in and versions, operating system and Website and other technology on the devices you use to access our Website.

2. Account information. When you use our Services as a registered user, you need to create an account with us. In order to create a registered user account, you will need to provide us with login credentials (which include your email address and name.) Thrive People Solutions utilizes Mighty Networks, [click here to review their Privacy Policy](#).

3. Communication. You can post comments, leave feedback, correspond with a person on and through the Website. Content, including such comments, feedback, and notes you choose to post through the Website are available to the public by default. You may also





contact us via a contact form, email, or by other means (for example, with questions about our Services, for customer support, or to let us know your ideas for new products or modifications to existing products). When you do so, we collect the information you choose to provide us, such as your contact details, any images you choose to upload and the contents and nature of your message. Any information that is disclosed in these areas becomes public information for both us and other users to use and share.

4. Information about Others. You can choose to provide us with information relating to third parties, including their names, email addresses, or phone numbers (collectively, “**Third-Party Data**”).

If you use any feature of the Services that allows you to communicate with third parties (such as to refer a third party to the Services or to communicate with them regarding a campaign or a donation), either by submitting Third-Party Data to the Website or otherwise permitting the Services to automatically access Third-Party Data in your possession, you acknowledge and agree that you have the authority of the relevant third party for us to access and use the relevant Third-Party Data and that you have notified these third parties and informed them how their information is collected and used by Company to provide the Services.

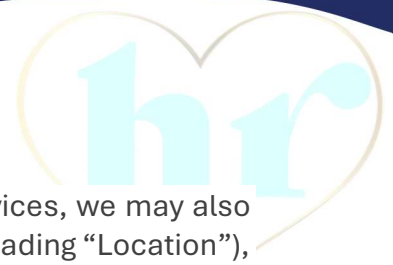
We use Third-Party Data to (i) contact such third party using the Third-Party Data provided, and/or (ii) provide you with an editable template message designed to facilitate communication between you and such third party through the Services. In addition to sending the foregoing communications, we may also send reminders or related messages to you and to third parties on your behalf from time to time where permitted by applicable law. In each case, any such communications sent to third parties using Third-Party Data will provide a means to “opt out” of receiving further communication of the same nature.

2. Information Collected Passively or Automatically

1. General Usage Data. When you use the Website, we collect certain information by automated means (“**Automatic Information**”), such as through server log files, cookies (described further below), web beacons (also known as clear GIFs and pixel tags, which may be used to transmit information back to the Website), and embedded scripts (programming code that is designed to collect information about your interactions with the Website, such as the links you click on). Automatic Information will not be published or made public through our Services.

When you use our Services, we may collect user action data using Google Analytics, and technical properties of hardware and software utilized in conjunction with our Services. For example, we may collect the type and model of hardware and/or web browser you are using





and the operating system version you are using. When you use our Services, we may also collect information about your location (as described below under the heading “Location”), how long you use our Services for in each session, features you use in our Services, and the actions you take while using our Services.

2. Location. When you use our Services on your computer, mobile device, or other device, the Internet Protocol address (IP address) information may be communicated to us. If we collect and subsequently store such information, it will be in a form that does not personally identify you.

3. Marketing & Communications Data. We collect your preferences in receiving marketing collateral from us and from certain third-parties, in addition to, your communication preferences.

4. Cookies. When you visit the Website, we collect certain information about your activity on the Website, as described below under the heading “Automatic Information”.

For further clarification, cookies are alphanumeric identifiers that are stored on your device with which you access the Services. These cookies allow us to adjust our Services to meet your personal browsing preferences. If your browser is not set to allow cookies, you may not have access to all areas or features of the Website.

The information we collect in this manner may include details about the computer, mobile phone, or other device used to access the Website (such as browser type, operating system, and IP address), referring URLs and information on actions taken or interaction with our digital assets.

Third party vendors may also use cookies to serve you ads based on your visit to the Website. You may opt out of Google’s personalized advertising by visiting “Ads Settings”. You may opt out of other third-party vendor’s use of cookies for personalized advertising by visiting their website, and/or by visiting <https://youradchoices.ca/choices>.

The information we collect in this manner is to enhance your user experience. For example, this information allows us to pre-fill form fields as well as provide you with contextual recommendations while using the Website.

PART B – USE OF YOUR INFORMATION

We use Personal Information for the purposes stated or implied at the time of collection, including for the following purposes:



1. Communication

We use the information we collect to contact you for administrative purposes. For instance, if you contact us by email, we will use the information you provide to answer your question or resolve your problem.

We also use the information we collect to send you communications relating to the Services, such as updates on promotions and events, communications relating to products and services offered by us and by third parties, and communications about services we believe will be of interest to you. For example, we can send periodic emails to registered users of the Services relating to their recent interactions with the Services, such as donating or expressing interest in an experience.

You may update your communication preferences anytime by writing us at support@thrivepeople.ca but we reserve the right to correspond with you in respect of all services.

2. Providing the Services

We use the information we collect to operate, maintain, and provide our Services such as enabling access to the Website, customer support or to complete transactions, which may include sharing your information with the stakeholders relevant for the execution of a transaction in relation to monies or sharing of a person's status as a certified individual.

3. Analytics and Product Development

We use the information we collect to analyze data usage trends and preferences in order to improve the accuracy, effectiveness, security, usability or popularity of our Services. Certain third parties whose tools are utilized (e.g. Google Analytics) involving technologies described earlier (cookies, tags, beacons) to help us obtain information and drive certain functionality and improvements require such third parties to collect and storage such information (in accordance with their own privacy policies).

4. Customization and Advertisements

We use the information we collect, such as browsing behavior and device identifiers, to learn how users interact with our Services in order to personalize the content of our Services and improve the performance of the Website. We utilize such information to also provide you advertisements on the Website; such advertisements may originate from us or a third party with whom we may share your data, including device information, and browser data.





We do not provide your email or contact information to a third-party advertiser without your express consent.

5. Legal

We use information we collect to comply with laws, defend our legal rights, and enforce our Terms.

PART C – ANTI-SPAM

Where applicable, we will seek your express consent to contact you, including by way of commercial electronic messages. We will request your consent and you can contact us at 1-888-712-9993 or email at support@thrivepeople.ca. You can unsubscribe at any time from receiving commercial electronic messages by following the instructions in the message.

Even if you have opted out of receiving marketing communications from us, please be aware that we may still contact you for other purposes. For example, we may contact you to provide communications you have consented to receive, regarding the products or services we provide to you, or if you contact us with an inquiry.

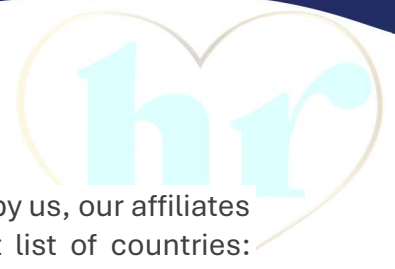
PART D – CHILDREN’S ONLINE PRIVACY PROTECTION

The Website and Services are not intended for use by persons under 18 years of age. We do not knowingly collect or use any Personal Information from any persons under 13 years of age. If we become aware that we have unknowingly collected Personal Information from a child under the age of 13, we will make commercially reasonable efforts to delete such Personal Information from our database.

PART E – TRANSFERS AND DISCLOSURES OF PERSONAL INFORMATION

Other than as disclosed in this Privacy Policy, we will not disclose Personal Information to any external organization, including our subsidiaries and affiliates, or engage with third parties (the “Related Companies”) without your consent unless we are required or permitted to do so by law, including in the event of a corporate amalgamation, reorganization, change of control or sale. We will take reasonable measures to protect your information while it is in the Related Companies’ possession including requiring any such Related Company to treat your personal information in accordance with this policy and all applicable data protection laws.





Your Personal Information may be stored, processed or otherwise used by us, our affiliates or our service providers, both inside and outside of Canada [Current list of countries: Canada]. As a result, that country's courts, governments or law enforcement agencies could obtain disclosure of your information in accordance with that country's laws. Whenever we hire other organizations to provide support services, they will be required to conform to our privacy standards and to allow us to audit them for compliance.

PART F – SECURITY AND RETENTION

The security of your personal information is very important to us. We take all reasonable precautions to protect the security and confidentiality of your Personal Information. We protect the Personal Information within our custody or control with appropriate organizational, technological and physical safeguards.

We store Personal Information in electronic and physical files that are secure, and our security measures include secure on-site and off-site storage, restricted access to records and data processing equipment, password protocols, and encryption and security software. We conduct audits and monitor compliance with our privacy practices.

We only retain Personal Information for as long as is necessary for the purpose for which it was collected. When we no longer are required to retain the information, we will destroy, erase, or de-identify the information. Legal requirements, however, may require us to retain some or all of the Personal Information we hold for a period of time that is longer than that for which we might otherwise hold.

PART G – CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time as we add new products and services, as we improve our current offerings, and as technologies change. If we make any material or substantive changes in this Privacy Policy, we will notify you by posting a clear and conspicuous notice of these changes on the Website and in this Privacy Policy.

We include the date the Privacy Policy was last revised at the bottom of the page. You are responsible for ensuring that we have an up-to-date, active, and deliverable email address for you, and for periodically visiting our website and this Privacy Policy to check for any changes.

PART H – ACCESS, CORRECTION AND ACCOUNTABILITY





We will strive to keep all Personal Information in our files complete, up-to-date and accurate. Please keep us informed if your personal information changes. By law, you have the right to request access to and to correct the personal information we hold about you.

If you want to review, verify or correct your personal information you may send a written request to Sharon Bunce at sharon@thrivepeople.ca to access, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

PART I – QUESTIONS AND CONCERNS

We have appointed a Data Privacy Officer to oversee compliance with this Privacy Policy. If you have any questions, comments, concerns or complaints relating to this Privacy Policy, and any requests to correct or access Personal Information collected during your use of the Services, we invite you to contact the Data Privacy Officer at: Sharon Bunce at sharon@thrivepeople.ca. We will thoroughly investigate all written concerns or complaints.

