



Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the EU General Data Protection Regulation (GDPR), the data controller is The FASD Institute, 201-1037 West Broadway, Vancouver, BC, Canada, V6H 1E3.

You have the right to make a complaint at any time to the supervisory authority in your country regarding data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach any supervisory authority so please contact us in the first instance.

WHO IS THE PRIVACY NOTICE FOR?

This privacy notice describes the way we treat and use personal data that we collect about any person that uses our services.

IF YOU DO NOT PROVIDE PERSONAL DATA

If we need to process the data you provide us with about yourself to fulfill our service and you fail to provide that data when requested, we may not be able to perform the service, in which case, we may have to cancel a product or service you have with us. We will, of course, notify you if this is the case at the time.

WHAT INFORMATION DO WE USE?

We will collect and process the following data about you:

Information you give us. This is information about you that you give us by filling in forms on our website that you may access directly or through another website or by corresponding with us via e-mail or otherwise. It only includes the data required for you to be able to use our site and subscribe to our service. Financial and credit card information is collected in the event you purchase a product or enroll in a class.

When you report a problem with our website. The information you give us may include:

- Full name
- Address
- E-mail address
- Phone number

Other Information we collect about you. Regarding each of your visits to our website, we will automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products you viewed or searched, 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, and any phone number used to call our customer service number.
- Information we receive from other sources. This is the information we receive about you if you use any of the other websites we operate or the other services we provide. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment, and delivery services, analytics providers, search information providers, credit reference agencies). We will notify you when we receive personal data about you and the purposes for which we intend to use that information.

The FASD Institute is committed to protecting your privacy.

We will only use personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing to you directly, at any time by contacting us at admin@fasdinstitute.com

Information you give to us. We will use this information:

To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us.

To notify you about important changes to our service.

Information we collect about you. We will use this information:

To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

To improve our website to ensure that content is presented in the most effective manner for you and for your device.

To allow you to participate in interactive features of our service when you choose to do so.

As part of our efforts to keep our website safe and secure.

Information we receive from other sources. We may receive personal data about you from selected third parties that we work with or that provide us with a service (such as payment services, for example) and public sources.

MARKETING AND MAILING LISTS

For those who subscribe to our monthly newsletters, webinar announcements, class updates, we collect your email address to keep you updated on course information and on the Institute.

You can ask us to stop sending marketing messages to you at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time at admin@fasdinstitute.com

Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience, or other transactions.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any external company for marketing purposes

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us at info@synergeticplaytherapy.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

HOW DO WE SHARE YOUR INFORMATION?

You acknowledge and agree that from time to time we have the right to share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.
- Selected third parties including:
- Stripe Inc. ("Stripe") based in the US and Canada, for processing payments;
- Select business partners, suppliers and sub-contractors for the performance of any contract we enter into with you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If The FASD Institute or substantially all its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms and Conditions and other agreements; or to protect the rights, property, or safety of The FASD Institute, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

WHERE DO WE STORE YOUR INFORMATION?

All personal data we process is processed in Canada which is outside of the EEA.

For the purposes of IT hosting and maintenance, this information is located on servers outside the European Economic Area, in Canada.

Our external third parties such as Stripe are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

As your personal data is held outside the EEA we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us at admin@fasdinstitute.com if you want further information on the specific mechanism used by us about how your personal data is held out of the EEA.

Once we have received your information, we have a Data Protection regime in place to oversee the effective and secure processing of your personal data and we will use strict procedures and security features to try to prevent unauthorized access.

However, and unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website at the transmission stage; any transmission is at your own risk.

SECURITY

By using the Stripe Payment System, your financial data is secured through their system. Your financial data is stored in Stripe until you are no longer a customer. It is not visible to us because of The Payment Card Industry Data Security Standard (PCI DSS).

We store your personal data on our Thinkific and GoDaddy Engine (for more information on the security of Thinkific, please see this link <https://www.thinkific.com/privacy-policy/>. For more information on the security of GoDaddy <https://ca.godaddy.com/agreements/privacy>. It's also processed through a secure socket layer (HTTPS).

HOW LONG DO WE KEEP YOUR INFORMATION?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it, including the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We are required under Canadian tax law to keep basic personal data about our customers (name, address, contact details) for up to 7 years after which time it will be destroyed.

In some circumstances, we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. In some circumstances, you can ask us to delete your data. See below for further information.

WHAT ARE YOUR RIGHTS?

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to the processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

EXERCISING YOUR RIGHTS

If you wish to exercise any of your rights set out above, please email us at admin@fasdinstitute.com

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

CHANGES TO OUR PRIVACY NOTICE

Any changes we make to our privacy notice in the future will be posted on this page and notified to you by e-mail.