

Safety Training Network (STN) respects your right to privacy. This policy summarizes what personally identifiable information we may collect, and how we might use this information. This policy also describes other important topics relating to your privacy.

# STN 's general policy on privacy

Protecting the privacy and confidentiality of STN's customers' and employees' personal information has always been an important aspect of STN 's operations. Recently, fundamental privacy principles and their corresponding obligations have become law. To this end, STN has created a Privacy Code to inform people of its commitment to, and policy on, privacy.

It is the responsibility of all STN employees to follow STN's Privacy Code and related policies when collecting and handling the personal information of STN customers or employees.

Personal information is defined as any piece of information, either factual or subjective, about an identifiable individual. Personal Information does not include the name, title, business address or telephone number of an employee of an organization.

It is STN policy that STN obtain an individual's consent when a STN employee or website collects, uses or discloses personal information.

STN will also inform its customers and employees of the purpose for the collection, use and disclosure of personal information.

STN takes care to safeguard all personal information in its possession against loss, theft and unauthorized use or disclosure. STN uses reasonable efforts to ensure that such information is accurate and up to date. We provide our customers and employees with a procedure to access the information STN keeps about them and to make corrections to this information where appropriate. Please review the STN Privacy Code and the STN Privacy Policy for more information on STN 's commitment to privacy.

If you have any questions about this Privacy Policy, please email us at <a href="mailto:jeremy@safetytrainingnetwork.ca">jeremy@safetytrainingnetwork.ca</a>

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# **STN Internet Privacy Policy**

STN respects your right to privacy and is committed to the protection of your personal information. This policy summarizes what personally identifiable information we may collect, how we might use it and to whom we may disclose it to. This policy also describes other important topics relating to your privacy.



#### Information collection

STN will only collect personally identifiable information (such as name, address, telephone number, or email address) that you voluntarily provide through our website or email correspondence. We will collect general information (such as the type of browser you use, the files you request, and the domain name and country from which you request information) to improve our website and better meet your needs.

# Information automatically gathered from your device

**Device and browser information.** STN may collect technical information about your device, such as device type, browser type, IP address, operating system, and device identifier. STN collects this information automatically from your device and web browser through cookies and similar technologies.

**Information about how you interact with us.** STN may collect technical data about your usage of STN Internet Sites and Apps and how you interact with our digital advertisements and promotions, such as content viewed or downloaded, features used, links clicked, STN promotional emails opened, and dates and times of interactions. STN collects this information using cookies and similar technologies.

**Location information.** STN may collect location information, including precise real-time location information from your device and imprecise location information derived from, for example, your IP address or postal code. STN Apps will NOT access precise real-time location information from your device unless you grant permission to do so.

# Cookies and similar technologies

A "cookie" is a file of information placed on your device when you visit a website. Cookies and similar technologies can enhance your user experience by saving your preferences, personalizing your online experience, holding items in your shopping cart, and sometimes providing you with advertising which is tailored to your interests.

#### More information

STN internet sites use "session cookies." A session cookie does not identify you personally and expires after you close your browser. For example, when you use the STN product catalog, we place a session cookie to note what pages you have viewed. We can use this information to provide you recommendations of other products that may be of interest.

STN internet sites also use "persistent cookies." These cookies do not expire when you close your browser. Persistent cookies stay on your computer until you delete them or they expire. By assigning your computer a unique identifier, we are able to create a database of your previous choices and preferences which can be provided by us automatically, saving you time and effort on future visits. For example, after you make a purchase, if you decide to make another purchase, your shipping address may have been retained and will only need to be confirmed.

Certain countries require your consent to the use of cookies when you visit STN internet sites. If you access a STN Internet Site for one of these countries, you will be presented with information regarding your options, including the option to accept or reject certain categories of cookies. You will be able to change these settings on subsequent visits. Please note that you will not be able to opt



out of receiving certain cookies that are strictly necessary for the delivery of a service requested by you.

At any time when visiting a STN Internet Site for one of these countries, clicking on the "Cookie Preferences" link at the bottom of each page allows you to access information on cookies and change your settings.

Although you are not required to accept cookies when you visit a STN Internet Site, you may be unable to use all of the functionality of the site if you reject certain cookies.

In addition, your browser may allow you to adjust settings to accept or reject cookies, or to alert you when a cookie is placed on your computer.

**Analytics and advertising.** STN uses third-party analytics services to better understand how users engage with STN internet sites and Apps, including services provided by Google and Adobe. Please use the following links for more information about how Google and Adobe collect and use data when you visit their partners' websites or apps:

- https://policies.google.com/technologies/partner-sites
- https://www.adobe.com/ca/privacy/experience-cloud.html

STN also uses third-party advertising services to provide advertisements for STN products or services that may be of interest to you when you visit websites or other online services.

STN allows selected third parties, including these analytics and advertising services, to place cookies on STN internet sites. These third parties may collect information about your online activities over time and across third-party websites.

These third parties may be members of industry self-regulatory groups such as the Network Advertising Initiative (NAI) (English only), Digital Advertising Alliance (DAA) (English only) and European Digital Advertising Alliance (eDAA) (English only). The websites for these groups provide more information on interest-based online advertising and how to opt out of receiving interest-based online ads from participating companies.

**Do Not Track browser settings.** Some browsers may transmit "Do Not Track" ("DNT") signals to the websites you visit. Because there is not common agreement about how to interpret DNT signals, STN currently does not take action in response to them.

### Information from business partners and other third parties

STN collects personal information through our Business Partners. This information may include contact information, such as name, company name, job title, address, email address, and phone number.

STN may also obtain personal information from other third-party sources, including publicly and commercially available sources. STN may combine the information we receive from our Business Partners and other third-party sources with information that we collect from you or your device, as described above.

You have choices about the personal information you provide STN. You may choose not to provide information that STN requests, but if you do so, STN may not be able to provide you a relevant service or a particular feature for a STN internet site, app, or product.

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## Use and disclosure of information

Before we collect any personally identifiable information, we will identify the purpose for our collection, use and any possible disclosure of your personal information.

For instance, the information you supply will be used by STN to respond to your inquiries, supply you with requested information on STN products and services, or track orders you place with STN.

STN will seek your consent to use your personal information at the time of collection or in advance. Consent may be expressed in writing, or implied, and in some cases may be provided verbally or electronically. With your consent, authorized third parties may be utilized by STN to collect, track and process such information. It may also be necessary, if required by law or if pertinent to judicial or governmental investigations, to release your personally identifiable information.

If you have subscribed to electronic newsletters and you wish to unsubscribe, you may click the unsubscribe link that appears at the bottom of every email.

If you have submitted personal information to STN electronically and would like to have it removed or modified, please contact Jeremy at <a href="mailto:jeremy@safetytrainingnetwork.ca">jeremy@safetytrainingnetwork.ca</a> or write to:

Safety Training Network Inc. PO Box 1674 Three Hills, AB T0M2A0

Please note that should you choose not to provide STN with the necessary personal information, STN may be unable to service your request for STN products or information. We will use all reasonable efforts to comply with your request.

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# **Children and parents**

STN does not intend to collect personally identifiable information from children under age 13 without permission of the child's parent or legal guardian. Children under the age of 13 should submit personally identifiable information to STN only with the explicit permission of their parent or legal guardian. Where appropriate, STN will instruct children not to submit personal information. If your child has submitted personal information and you would like to request that such information be removed, you may do so as indicated above and STN will use reasonable efforts to comply with your request.

# Other important information

The STN web site may contain links to other sites. STN does not endorse or otherwise accept responsibility for the content or privacy policies of those sites. Additionally, some of STN web pages may contain "cookies," which are data that may be sent to your web browser and stored on your computer. This allows our server to "recognize" you when you visit our web site in the future. These



cookies do not contain personally identifying information. Most web browsers can be configured to not accept cookies, or to notify you if a cookie is sent to you.

STN reserves the right to modify this privacy policy at any time. We will promptly reflect any such modifications in these web pages.

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# STN 's privacy code

The STN Privacy Code is a formal statement of the principles and guidelines concerning the requirements for the protection of personal information provided to STN by its customers and employees. STN strives to provide its customers with the best service possible. This means handling your personal information fairly and honestly.

The purpose of the STN Code is to provide responsible and transparent practices in its management of personal information in keeping with applicable legislation. It tells you how we protect your privacy and the confidentiality of your personal information.

#### **Personal information**

Personal Information is any piece of information, either factual or subjective, about an identifiable individual. Personal Information does not include the name, title, business address or telephone number of an employee of an organization.

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# The 10 principles of privacy

The following principles, developed by the Canadian Standards Association, form the basis of STN's fair information practices and outline STN 's commitment to protecting your privacy.

# **Accountability**

Every STN employee is responsible for maintaining the confidentiality of all information to which they have access. STN employees are informed about the importance of privacy and receive ongoing updates on privacy related policies.

In addition to establishing the Privacy Code, we have appointed a Chief Privacy Officer who is responsible for overseeing the personal information handling practices at STN and ensuring we are in compliance with our Privacy Code and related policies.



## Identifying purposes: why we collect information

Should STN need to collect personal information from you, STN will identify the purpose for the collection at or before the time STN collects it. STN will only collect the information needed to fulfill the purpose we have identified and for no other purpose. If STN wishes to use your information for any other purpose we will obtain your consent.

STN asks for your personal information in order to meet your service and product needs, as well as to establish a lasting relationship with you as your quality STN service and product provider.

The information STN asks for depends on which services you require from STN. For example, we may request your personal information to:

- send you products or information that you have requested
- provide you with a specified service
- better understand your needs
- provide you with information and offers on our products and services
- comply with law

#### Consent

STN seeks your consent to collect, use or disclose your personal information at the time of collection or in advance. STN has taken steps to ensure that our language is clear and understandable so that you know why we are collecting your information and how we will use it. Please note that under certain legal and medical circumstances it may be impossible or impractical to obtain an individual's consent.

Consent may be expressed in writing or it may be implied in the circumstances. In addition to writing, your consent may also be expressed verbally or electronically.

In deciding what form of consent is appropriate, STN will consider the type of personal information STN needs, its use, any necessary disclosures, the type of customer contact that is involved and applicable legislation.

In general, you can choose not to provide STN with some or all of your personal information at any time. However, should you make this choice STN may not be able to provide you with the product, service or information that you requested or that could be offered to you. Upon request STN will explain your options of refusing or withdrawing consent to the collection, use, and disclosure of your personal information.

## **Limiting collection**

STN does not collect personal information indiscriminately. Rather, we limit our collection of personal information to only what is necessary for the purpose we have identified. We employ fair and lawful means in the collection of personal information.



# Limiting use, disclosure and retention accuracy

STN will use or disclose your personal information for the purpose for which it was collected, except with the consent of the individual or as required by law.

There are some instances in which STN may be required to disclose your personal information as part of STN conducting its business in the ordinary course; this includes, for example, suppliers and distributors. When STN hires other organizations to provide support services, STN will require them to conform to our privacy standards.

STN will retain personal information only for as long as required to fulfil the identified purpose. Once your personal information is no longer required, it will be destroyed or made anonymous.

### **Accuracy**

STN endeavours to keep STN's personal information holdings complete, up-to-date and accurate. While STN does their best to ensure our information is accurate, STN does rely on individuals to inform STN of any relevant changes in their personal information.

Should you discover, upon review of your personal information, that amendments are required, please advise STN. If the requested change is accepted, the personal information will be modified in accordance with your request as soon as possible and you will receive a copy of the amended portion of the record.

When a correction or amendment has been made to a personal record, STN will, where appropriate, send a copy of the correction to any persons or organizations that have access to the information in question.

If the requested change is not accepted, you will be notified in writing that the change will not be made. You will be given an opportunity to submit a statement concerning the dispute which will be maintained along with the disputed information for as long as STN retains that information. Where appropriate, third parties who have received the disputed information will also receive a copy of the statement of dispute.

## Safeguards: protecting your information

STN employs appropriate safeguards to make certain that your personal information is protected from loss or theft as well as from unauthorized access or disclosure.

STN may employ other companies to provide services to you on STN's behalf, such as data processing or records retention. When this occurs, STN has contracts in place to ensure your personal information is protected by the same high standards that govern STN 's information handling practices.

The nature of the safeguards and level of protection will depend on the sensitivity of the information in question and incorporates physical security measures (locked doors and file cabinets), organizational controls (visitor sign in and employee identification cards), and technological tools (computer passwords and encryption).



STN audits its security measures to ensure our practices conform with STN's Code and related privacy policies.

# **Providing access**

STN will provide you with access to the information it retains about you upon receipt of a written request and satisfactory identification. We may charge you a nominal fee and if so, we will give you notice in advance of costs for processing your request.

Upon written request and satisfactory identification, we will also correct or amend any personal information if its accuracy and completeness is found to be deficient.

There are some instances where STN will not be able to provide an individual with the requested information. Some of these instances include where the information:

- consists of references to other persons that cannot be otherwise severed
- is subject to solicitor—client privilege
- contains confidential STN proprietary information
- has already been destroyed due to legal requirements or because it was no longer needed for the identified purpose

If STN is unable to provide you with the information you have requested, the reason for the refusal will be explained in writing.

# **Providing recourse**

If you have any questions or concerns about the privacy of your personal information or our Privacy Code, please contact us at 1-403-390-3603. In most cases, an issue may be resolved informally by telling STN your concern and discussing it with STN.

If the issue is still not satisfactorily resolved, STN will provide information on other complaint procedures that may be available to you.

