

## INTRODUCTION

Morning Star Consultive Services ("we," "our," or "us") is committed to protecting the privacy of our clients, website visitors, and stakeholders.

This Privacy Policy explains how we collect, use, disclose, and protect your personal information when you use our website, digital platforms, and services.

We comply with the Personal Information Protection and Electronic Documents Act (PIPEDA), applicable provincial privacy legislation, and Quebec's Act to Modernize Legislative Provisions Respecting the Protection of Personal Information (Law 25).

By using our website, you consent to the practices described in this Privacy Policy.

## DEFINITIONS

For the purposes of this Privacy Policy:

- **Personal Information** means any information that can identify an individual, such as name, email, address, phone number, or IP address.
- **User** means any individual who visits or interacts with our website.
- **Registered User** means a user who has voluntarily provided personal information to access our services, programs, or purchases.
- **Third-Party Services** refers to external providers assisting us in operations, including payment processors, analytics providers, and hosting services.
- **Profiling Technologies** refers to automated processes (e.g., cookies, analytics, advertising pixels) that analyze or predict preferences, behaviors, or interests.

## INFORMATION WE COLLECT

### A. Information You Provide Directly

We collect personal information when you:

- Contact us by email or form submission (name, email, phone number, message content)
- Subscribe to our mailing list or register for events
- Engage our consulting services or make payments (business details, billing information)
- Participate in surveys, promotions, or feedback sessions

You may unsubscribe from communications at any time.

## **B. Information Collected Automatically**

When you visit our website, we may automatically collect:

- Device information: IP address, browser type, device type, operating system
- Usage data: pages visited, duration of visit, referring URLs
- Cookies and pixels: to improve user experience, analytics, and functionality
- Analytics data (e.g., Google Analytics 4) is configured to anonymize IP addresses where possible.

## **HOW WE USE YOUR INFORMATION**

We use your personal information to:

- Provide, manage, and personalize our services
- Process payments and maintain secure transactions
- Respond to inquiries and communicate updates
- Improve website content and user experience
- Comply with legal or regulatory obligations
- Protect our website and users from fraud or unauthorized activity
- We only collect and use personal information for purposes that a reasonable person would consider appropriate under the circumstances.

## **EMAIL COMMUNICATIONS & CASL COMPLIANCE**

We follow the **Canadian Anti-Spam Legislation (CASL)** by ensuring that:

- We send commercial emails only with express or implied consent
- All emails include an unsubscribe link
- Unsubscribing removes you from future promotional communications
- You may withdraw consent at any time by contacting [info@morningstarconsultant.com](mailto:info@morningstarconsultant.com)
- We never sell or rent your email address.

## **CHILDREN'S PRIVACY**

Our website and services are **not intended for children under 13 years of age**. We do not knowingly collect personal data from children.

If you believe a child has provided information, please contact [info@morningstarconsultant.com](mailto:info@morningstarconsultant.com) so we can promptly delete it.

## HOW WE SHARE YOUR INFORMATION

We do not sell, rent, or trade your personal data. We may share it only with:

- **Service Providers** – trusted partners who perform operations such as payment processing, hosting, or analytics, under contract requiring confidentiality and equivalent privacy protections
- **Legal or Regulatory Authorities** – if disclosure is required by law, regulation, or court order
- **Business Transfers** – in the event of a merger, acquisition, or restructuring, your information may be transferred under confidentiality safeguards

We do not authorize service providers to use your data for their own marketing or unrelated purposes.

## DATA SECURITY MEASURES

We apply technical and organizational safeguards to protect your information, including:

- Encrypted servers and secure payment gateways
- Role-based access to personal data for authorized personnel only
- Regular security audits and software updates
- Privacy-by-design and privacy-by-default principles consistent with Law 25

While we take reasonable precautions, no online system is completely secure; please use caution when sharing sensitive data.

## RETENTION OF PERSONAL INFORMATION

We retain personal information only as long as necessary to fulfill the identified purposes, meet legal requirements, and resolve disputes.

Once retention is no longer required, we securely delete or anonymize data in accordance with recognized standards such as NIST SP 800-88 Rev. 1.

## YOUR RIGHTS & CHOICES

You have the right to:

- Access your personal data and obtain a copy
- Correct or update inaccurate information
- Withdraw consent for specific processing or marketing
- Request deletion of your personal data, subject to legal obligations

- Request data portability (for Quebec residents under Law 25)
- Object to profiling or automated decision-making

To exercise any of these rights, please contact us at [info@morningstarconsultant.com](mailto:info@morningstarconsultant.com). We will respond within 30 days or as otherwise required by law.

## **COOKIES & TRACKING TECHNOLOGIES**

We use first-party and third-party cookies and similar technologies (e.g., pixels, tags, scripts) to:

- Enable essential website functionality
- Analyze traffic and performance
- Personalize content and improve services

Non-essential cookies (analytics, marketing, or profiling) are disabled by default until you provide express consent through our cookie banner or settings tool.

You can adjust or withdraw your consent at any time by selecting “Cookie Settings” on our website or contacting [info@morningstarconsultant.com](mailto:info@morningstarconsultant.com).

A detailed list of cookies, their purposes, and retention periods is available in our separate Cookie Policy.

## **INTERNATIONAL DATA TRANSFERS**

If your personal data is transferred or stored outside Canada (for example, on U.S. cloud servers), we ensure that adequate safeguards—such as contractual data-protection clauses—are in place consistent with PIPEDA Schedule 1 and Law 25 Section 17.

## **CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy periodically. Material updates will be posted prominently on our website with an updated effective date, and when legally required, you will be notified directly.

## **CONTACT INFORMATION**

For privacy questions, requests, or concerns about this Policy, please contact:

**Morning Star Consultive Services**

Email: [info@morningstarconsultant.com](mailto:info@morningstarconsultant.com)

Office Address: 93 Lombard Avenue, Winnipeg, MB R3B 3B1

Social Media: [LinkedIn](#) | [Instagram](#)