

Happy Hounds Privacy Policy

Happy Hounds Inc. ("Happy Hounds" or) has established this Privacy Policy to explain how it protects and manages the personal information that it collects from you (the client) online and offline. This privacy policy may be updated at any time, and a copy of the updated policy will be posted on the Happy Hounds website.

Privacy Officer

The privacy officer of Happy Hounds Inc. is the business owner, Jillian Whitfield. The responsibility of the privacy officer is to respond to inquiries and complaints; understand the legislation; and apply pertinent changes to the Happy Hounds Privacy Policy. Contact information is: phone: 705-970-5671 or email: info@happyhoundsco.ca.

Why is this Personal Information Collected (Business Purposes)?

Happy Hounds collects and uses personal information for the following Identified Purposes:

- To understand and fulfill client needs or requests for Happy Hounds products and personalized services; and to refer business to Happy Hounds participants;
- To provide services and products for our clients, including transmitting training information, training class schedules or materials or to arrange appointments.
- To confirm the Identity of specific clients (to avoid breaching the privacy of other clients)
- To communicate with clients and site visitors, when necessary, and to inform clients of upgrades, as well as marketing offers for other products and services available from Happy Hounds, its affiliates and third parties;
- To bill accounts and maintain payment records; and to collect payment, or unpaid accounts if necessary;
- To comply with any applicable law, regulation, legal process or government request; or to bring legal action if the company is threatened.
- To respond to a legitimate claim, or to address our reasonable belief, that you are violating the rights of any third party or any of the agreements or policies that govern your use of the Happy Hounds site or any product or service;
- To protect the services, products or rights of Happy Hounds, including but not limited to the security or integrity of the Happy Hounds site; and
- To identify and resolve technical problems concerning the Happy Hounds site, products and services.
- To analyse client activity in aggregate form (i.e., not individually attributable to you) to understand visitor and client preferences via cookies or pixels for the website and/or social media, for its business analysis, operational, marketing and other promotional purposes; and to provide general statistics to organizations that track aggregate information regarding entrepreneurs.

When you visit the Happy Hounds web site, a cookie may be placed on your computer or the cookie may be read if you have visited the Happy Hounds site previously. If you choose to not have your browser accept cookies or pixels from the Happy Hounds web site, or social media sites, you may not be able to view all the text on the screens, or to experience a personalised visit, or to subscribe to certain service and product offerings on the Happy Hounds site.

Consent for Collection, Use and Disclosure of Information

Your use of the Happy Hounds site and/or your registration for products and services constitute your consent to the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Happy Hounds site or Happy Hounds products and services.

Consent is obtained from each client by giving them a form to be signed that explains the use of services and the set-up of client accounts. If a new use of client data is contemplated, Happy Hounds will seek approval for that use.

The consent statement explains that information permits business referral activities to Jillian Whitfield, owner, Happy Hounds, Inc., other Happy Hounds participants, and potential clients or associates for mutual benefit. This information is also used to create a membership profile, a web profile and establish email communications related to the Happy Hounds program.

Registration forms also outline the information that Happy Hounds uses to set up profiles on the public directory and contact emails for Happy Hounds information. Further updates to client information are the responsibility of the client, and they are given instructions to make updates or changes to their information. When made aware of these changes, we commit to using the new or updated personal information received.

Consent may be withdrawn by advising the Privacy Officer that the client is withdrawing consent (e.g. by unsubscribing from lists or requesting that information be unpublished).

Limiting the Collection of Personal Information

Happy Hounds limits its collection of personal information to only that information which is necessary for the Identified Purposes. Happy Hounds does not direct its site to, nor does it knowingly collect any personal information from children under the age of thirteen.

a) What kind of information does Happy Hounds collect?

For clients: Happy Hounds collects information to fulfill the business purposes outlined above, at the time of your registration, certain “personal information” (information that personally identifies you) including but not limited to the following:

- Contact information (both business and home information, including name, email addresses, home and business addresses, phone numbers)
- Financial information, including credit card information to establish recurring payments for Happy Hounds, for those who choose this option and while payments are due to Happy Hounds. This

information is kept by approval on physical forms during the period that payments are due to Happy Hounds, and then shredded.

- Pet information, e.g. age, condition, training habits and so on, for business purposes and marketing information in conjunction with pet service activities.
- For general visitors to the Happy Hounds site or social media, computer hardware or software information through cookies or pixels (e.g., IP address, operating system, browser type, domain name, URL, access times, and referring web site addresses).
- Information may be made available to the following third parties, all of which have privacy policies in place. They include:
 - The Happy Hounds accountant and bookkeeper (financial information for the purposes of tax planning and reimbursement)
 - Email Marketing services (in future)
 - Web firms which support the Happy Hounds website or which perform digital marketing activities (e.g. Go Daddy)
 - 3rd party backup software to ensure the security of Happy Hounds data and files (Go Daddy)

5. Limiting Use, Disclosure and Retention

Clients and non-clients who sign-on to receive email communications (without necessarily becoming clients of Happy Hounds), provide their name and email address. This information is stored in our Aweber account and the Happy Hounds website.

6. How will this information be processed and stored?

Your information may be stored and processed in the Canada or the United States, or in any other country in which Happy Hounds or its affiliates, subsidiaries, suppliers or agents maintain facilities. By using this web site, you consent to any such possible transfer of information outside of your country.

- Electronic files and information is primarily managed internally and is stored on computers belonging to Happy Hounds.
- When consent is obtained from each client, their email is added to our email list.
- Training notes and communications regarding the program are sent by the text or email address provided to Happy Hounds.
- If Happy Hounds hires other companies to provide some products or services on our behalf, we will only provide those companies or individuals the personal information they need for the Identified Purposes within their scope of work, and we will limit their rights to use and further disclose your personal information as appropriate in the course of their work for us.
- Information that Happy Hounds gathers and financial information is retained in paper-based files within a file cabinet which is not accessible to anyone else.

7. Will this information be disclosed?

Happy Hounds does not sell or rent your personal information to anyone. Happy Hounds does not disclose your personal information to anyone who falls outside the umbrella of the Identified purposes, except in limited situations (e.g. in accordance with subsection 8 (2) of the Privacy Act), for example in the following cases:

- To someone you have designated to act as your agent, for one or more of the Identified Purposes (listed above);
- To Happy Hounds employees, independent contractors, subsidiaries, affiliates, consultants, business associates, service providers, suppliers and agents, who provide services to Happy Hounds;
- Someone our clients have designated to act as their agent, for one or more of the Identified Purposes
- If Happy Hounds has reason to believe that disclosure is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference (either intentionally or unintentionally) with Happy Hounds' rights or property, other users of the Happy Hounds web site, products or services, or anyone else that could be harmed by such activities; and
- To respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law.
- In addition, as Happy Hounds continues to develop its business, we or our affiliates or partners may sell or buy other businesses or entities, or we may merge with another company. In such transactions, personal information may be one of the transferred business assets.

8. How long will the information be retained?

Happy Hounds member information will be used in relation to the identified purposes below. After your account becomes inactive, Happy Hounds will keep your personal information in its private archives. Your information will then be used only as necessary for tax reasons or to prove that Happy Hounds is compliant with any applicable law.

- When a member has unsubscribed from the Happy Hounds email list, their email address is maintained in our database under the unsubscribed category to ensure adherence to legal statutes.
- Products or services may be removed from a client as a result of an account that is not in good standing (and until payment is made and according to CRA guidelines).
- Financial records are retained according to CRA guidelines.
- Client credit card information is maintained until outstanding payments to Happy Hounds are completed, resulting in a zero account balance.

9. How will information be disposed of?

- Once accounts have achieved a zero balance, credit card information is shredded.

- Happy Hounds account records are maintained to satisfy CRA requirements, and then will be shredded.
- Happy Hounds databases will be archived and stored in a secure location, since Happy Hounds may offer clients long-term services past their active participation as paid clients.

6. Ensure the Accuracy of Personal Information

The Chief Privacy Officer is responsible to ensure the information collected is as accurate as can be at the time of collection. Happy Hounds ensures the accuracy of personal information by asking their clients to fill in and complete their own information and registration forms. Happy Hounds will use reasonable efforts to keep client personal information accurate for the Identified Purposes, and to minimize the possibility of making inappropriate client decisions based on such information.

Clients are responsible for informing Happy Hounds about changes to their personal information. They can do this by sending an email to info@happyhoundsco.ca or using the contact form on the website. Happy Hounds will use new or updated personal information it receives from clients to update its own records.

7. How will the information be safeguarded?

Electronic databases, servers and individual computers are password protected. All computer hardware has firewall and virus protection in place and data is backed.

The filing cabinet housing personal information in the Happy Hounds office is secured when not in use. Access is only granted on a need-to-know basis to those individuals who are under contract to Happy Hounds to provide specific services. No unauthorized parties are able to access this information.

8. Openness, and

9. Individual Access

Requests for access, updating or withdrawal of information

Happy Hounds will afford clients and vendors a reasonable opportunity to review the personal information in their file. Please direct any requests for access to your information in writing to Jillian Whitfield, info@happyhoundsco.ca or by mail at 4 Redwood Court, Barrie, ON L4M 5G7

- Please allow 14 days for a response to your request.
- Your information will be provided to you as quickly as possible (but no later than 30 days from the date of your request), as long as that information may be legally copied to the person making the inquiry.
- If Happy Hounds is not able to provide access to some aspect of a client's personal information, it will provide reasons for denying access such as (see legal restrictions and examples below):
 - That the information relates to a breach of an agreement or a contravention of law

- Its disclosure could reasonably be expected to threaten the life or security of another individual.

In terms of mandatory exceptions, organizations must refuse an individual access to personal information:

- If it would reveal personal information about another individual unless there is consent or a life-threatening situation. This is unlikely since records are usually individual but could be required in the event of involvement in a law suit; or
- If an individual requests that he or she be informed of information disclosed to a government institution in certain specified cases, or for access to the information itself, and the government institution objects to the institution complying with the access request. In such cases, Happy Hounds must refuse the request and notify the Privacy Commissioner of Canada. As well, Happy Hounds cannot inform the individual of the disclosure to the government institution, that the institution was notified of the request, or that the Privacy Commissioner of Canada was notified of the refusal.

In terms of discretionary exceptions, Happy Hounds may refuse access to personal information if the information:

- Is protected by solicitor-client privilege
- Would reveal confidential commercial information, although if this information can be redacted, Happy Hounds™ will release the remaining information
- Would reasonably be expected to harm an individual's life or security; although if this information can be redacted, Happy Hounds™ will release the remaining information
- Was collected without the individual's knowledge or consent to ensure its availability and accuracy, and the collection was required to investigate a breach of an agreement or violation of a federal or provincial law (the Privacy Commissioner of Canada must be notified)
- Was generated in the course of a formal dispute resolution process, or
- Was created for the purpose of making a disclosure under the *Public Servants Disclosure Protection Act* or a related investigation.

10. Challenging Compliance: Recourse

Complaints about the organization

- Please direct any complaints about the Happy Hounds organization in writing to Jillian Whitfield, info@happyhoundsco.ca
- Please allow 14 days for a response to your request.
- To find resolution to a complaint, first approach the Happy Hounds privacy officer. Should that prove unsatisfactory, individuals can contact the Privacy Commissioner of Canada: [Daniel Therrien](mailto:Daniel.Therrien@pco.gc.ca), 112 Kent St., Ottawa, ON K1A 1H3. 1-800-282-1376

1-613-947-6850 Fax

www.privcom.gc.ca

Clients have the right to request that information is removed that is no longer accurate or complete and information be amended as appropriate, by contacting Jillian Whitfield as described above, who will promptly correct such personal information.

Any challenges an individual wishes to make to the organization's compliance with the above principles in this policy should be addressed to Jillian Whitfield, the Chief Privacy Officer at the above contacts, in writing.