CDT DATA COLLECTION AND PRIVACY POLICY

This Privacy Policy (the "**Policy**") applies to Collaborative Divorce Toronto ("**CDT**") members, Prospective Members, and members of the public.

If you do not consent to the collection, use and disclosure of your Personal Information in accordance with this Policy, do not provide CDT with any Personal Information. You cannot withdraw your consent to CDT's collection of private information retroactively.

"**Personal Information**" is any information about an identified individual, or an individual whose identity may be inferred or determined from the information, other than business contact information (e.g. name, title, business address, telephone and fax numbers, and e-mail address).

Our use of Personal Information is limited to the purposes described in this Policy. We do not otherwise distribute any Personal Information we have obtained from you.

WHAT PERSONAL INFORMATION DOES CDT COLLECT?

CDT collects Personal Information about Members and non-Members provided in writing, including via electronic media.

A visitor to CDT's website is not required to reveal any information such as name, street address or telephone number, though they may choose to leave certain contact information via our Contact Page.

When a person wishes to purchase or renew a membership, they are asked to supply one or more items within the following classes of information:

- Corporate identification information;
- Personal identification information;
- Financial information (e.g. credit card information, purchase order numbers or any other payment information for billing purposes); and
- Delivery information.

We collect this information for billing and delivery purposes. We also use it to contact the individual about their order. In addition, we may use this information for future marketing and communications purposes.

COLLECTION OF INFORMATION THROUGH THE CDT WEBSITE

By accessing and browsing our website, you agree that we may collect, use and disclose any information we collect about you through our website(s).

Our web server automatically collects visitor information in the form of the visitor's domain or Internet Protocol (IP) address, as well as information about the use of the CDT website. We use this information to better serve visitors and Members by managing our sites, diagnosing any technical problems, and improving the content of our website.

For the transfer and receipt of certain types of sensitive information such as financial information, Members and Prospective Members may be re-directed to a secure server and will be notified through the site.

WHEN CDT MAY DISCLOSE YOUR PERSONAL INFORMATION

Except in limited circumstances, we do not reveal private information to anyone unless you have expressly or implicitly authorized us to do so.

There are circumstances where the use and/or disclosure of Personal Information may be justified or permitted, or where CDT is obliged to disclose information without consent. These circumstances may include:

- Where required by law or by order or requirement of a court or tribunal;
- Where the board of CDT believes that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- Where it is necessary to establish or collect fees;
- Where it is necessary to permit CDT to pursue available remedies or limit any damages that CDT may sustain;
- Where the information is public as permitted by law;
- Where it is reasonable for the purposes of investigating a breach of an agreement, or actual or suspected illegal activity; or

When this occurs, we will not disclose more information than is required.

CONSENT

By providing your Personal Information to us, you agree that we may collect, use and disclose it in accordance with this Policy and as otherwise permitted or required by law, including provision to affiliate organizations. We may seek your consent to use or disclose Personal Information after it has been collected in cases where we wish to use or disclose the information for a purpose not previously identified or expressed in this Policy.

WITHDRAWAL OF CONSENT

You may withdraw your consent to us collecting, using and disclosing your Personal Information at any time, subject to reasonable notice and any legal and/or contractual restrictions.

You may, at any time, ask us not to send you further marketing materials. If you do not wish to receive further invitations to events and programs, you may unsubscribe or contact Ryan Osbourne, the CDT Privacy Officer.

If you wish to withdraw your consent to have your CDT membership information disclosed to affiliated organizations, please contact the CDT Privacy Officer.

PROTECTION OF PERSONAL INFORMATION

We work to maintain appropriate physical, procedural and technical security safeguards. This also applies to our disposal or destruction of Personal Information.

In case of a breach involving your Personal Information under our control, we will notify you and the appropriate Privacy Commissioner(s) if it is reasonable in the circumstances to believe that the breach creates a real risk of significant harm to you, including physical, financial or reputational harm. We will also notify any other organization or government institution that can reduce the risk or mitigate the harm from the breach.

WEB TECHNOLOGIES

CDT may, does not necessarily use, the following technology to collect information:

(A) COOKIES

In browsing the Internet, you will encounter a technology called "cookies", which are small data files that are saved to your device when you visit our website(s). These are commonly used to provide you specific information from a website, and to provide the website's operator information about you. We may use both session cookies and persistent cookies. A session cookie is a temporary file which is only active while you are on the website and is erased once you close your browser. Unlike a session cookie, a persistent cookie is not deleted when you close your browser and will remain on your device indefinitely.

These cookies are used to improve navigation on websites and to collect aggregate statistical information. This information may be used for advertising and marketing initiatives after you conclude your session on the CDT website. The cookies may also track your activity on other websites or social media platforms that you visit after leaving the CDT website.

Should you wish to opt out of such tracking, you may do so by adjusting the cookie settings on your browser.

Please note that it is your responsibility to protect your user id and password information. If this information is disclosed the privacy of your information cannot be assured.

(B) BEACONS

Web beacons are small graphic images or other programming code (also known as "web bugs", "1x1 GIFs" or "clear GIFs") used to keep track of your navigation through the website(s) and your electronic communication with us. We may include web beacons in our web pages and email messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a web page or email can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes including, without limitation, to count visitors to our website, to monitor how users navigate the website, to count how many emails that were sent were actually opened, or to count how many particular articles or links were actually viewed. Web beacons may be used to collect certain personal information (for example, the email address associated with an email message).

(C) EMBEDDED SCRIPTS

An embedded script is a programming code that is designed to collect information about your interactions with our website(s), such as information about the links on which you click. The code is temporarily downloaded onto your device from our web server or a third party service provider. The code is active only while you are connected to our website, and is deactivated or deleted once you disconnect from the website.

LINKS TO OTHER WEBSITES

Our websites contain links to other sites. This Policy only applies to Personal Information that we collect, use and disclose. We are not responsible or liable for the privacy practices of third parties, and we strongly recommend that you review their privacy policies before you disclose Personal Information to them.

MARKETING

From time to time, we may engage in digital marketing campaigns. These efforts may include using social media platforms to promote goods and services. You consent to us using your Personal Information to serve advertisements and other announcements. When we do so, we follow the protocols and procedures established by the social media platforms you use. You consent to us working with your social media platforms in this manner.

ADVERTISING ON SOCIAL MEDIA AND OTHER WEBSITES

We may also use social media cookies to identify our members who are registered users of the following social media platforms: Facebook, Instagram, Twitter and LinkedIn. We may also use information from a Member's public profile to use in Social Media Posts promoting CDT and its members.

You may opt out of social media platforms by contacting the CDT Privacy Officer.

ELECTRONIC COMMUNICATIONS

Email is our preferred method of communicating with you and others. These emails, and other electronic communications from us, may contain information that is confidential or privileged, unless you instruct us not to send such information electronically.

While we make every effort to secure all electronic communications within our control, there are inherent risks involved with exchanging information electronically. For example, third parties may accidentally or deliberately intercept this information. We are unable to accept responsibility or liability for any damages you may suffer as a result of the interception, alteration or misuse of information during electronic exchanges.

CDT responds on a timely basis to requests from CDT stakeholders about their Personal Information, which CDT possesses or controls.

We will generally make available to you any Personal Information that we have collected about you, utilized or disclosed, upon your written request, to the extent permitted or required by law. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes.

You can at any time, challenge the accuracy or completeness of the Personal Information we have which is related to you. Where we validate your identity, and you successfully demonstrate the inaccuracy or incompleteness of your Personal Information, we will amend the Personal Information as required. Where appropriate, we will transmit the amended information to third parties having access to your Personal Information.

CHANGES

This Policy is in effect as of May 1, 2021. From time to time, we may review this Policy. We reserve the right to change this Policy, and any of our policies or procedures concerning our practices for handling Personal Information, at any time and without any prior notice.

CONCERNS

Please direct your questions or concerns to the CDT Privacy Officer.

If we are unable to resolve your concerns to your satisfaction, you may contact the Privacy Commissioner of Canada by writing to:

The Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec
K1A 1H3