

## PRIVACY POLICY

Last updated: September 9, 2020

Freedom School Co. values its user's privacy. This privacy notice discloses the privacy practices of [www.freedomschool.co](http://www.freedomschool.co) (hereinafter: the "Website"), owned **Freedom School Co**, a sole proprietor in the Province of Ontario operated by Rachael Hunt (hereinafter: the "**Company**"). This Privacy Policy (herein: "Policy") will help you understand how we collect and use personal information from users of our Website. This Policy applies solely to information collected by this Website, and affiliated social media accounts. It will notify you of the following:

1. What personally identifiable information is collected from you through the Website, why it is collected, how is it used and with whom it may be shared;
2. What choices are available to you regarding the use of your data;
3. The security procedures in place to protect the misuse of your information;
4. How you can correct any inaccuracies in the information.

We reserve the right to make changes to this Policy at any given time. If you want to make sure that you are up to date, we advise you to frequently visit this page. If we decide to utilize the personally identifiable information in any other manner than prescribed when initially collected, you will be notified by email.

By using [www.freedomschool.co](http://www.freedomschool.co) and affiliated social media accounts, you are consenting to the data collection procedures expressed in this Policy.

### **INFORMATION WE COLLECT, USE AND SHARING:**

Website provides several opportunities for you, the user, to voluntarily provide us with your personal information in exchange for a free resource, to be added to our email or subscriber list, or to contact us. If you elect to "opt-in" and provide us with your personal information for any of these purposes, we will collect the information you provide, which may include your name, email address, phone number, and the text of any message you send us. We will also process personal information in the form of comments, images, or videos you make or share on our blogs, social media pages, or any other online forum currently available, or made available in the future. You understand that your decision to provide any information to us in this manner is voluntary and constitutes your clear consent to allow us to collect, process, and retain it.

*If you elect to fill out the "contact us" portion of our Website, or provide us with any other communication data, including but not limited to that provided via email, social media messaging or posts, or text messages, we may collect information including your name, email address, phone number, information you share with that social media platform, as well as the text of any message you send electronically. This data will be processed based on our legitimate interest in communicating with you, answering any questions or concerns you have. We may also retain your data to keep a record of the communication.*

*If you become a customer, we will collect additional information in order to carry out and complete the purchase and sale of the goods or services you have requested, including but not limited to your name, email address, billing address, credit card or payment information, and any other information necessary in order to complete purchase of the product or service you elect to buy. We will collect and process this data in order to fulfill our contractual obligation to complete your order and will not retain the information any longer than necessary. We use third-party data processors to take and complete payment, and we will not retain nor have access to your payment information.*

*If you are on our email list due to your consent to be added, or our legitimate interest in engaging in direct marketing, we may also use your data to send you targeted social media advertisements or upload your information into our social media account to create look-a-like audiences. To ensure compliance with the CAN-SPAM act, all emails from us will clearly state the sender of the email, as well as provide instructions on how to unsubscribe from our list or contact us with any questions or concerns.*

We may also collect information through Automatic Data Collection Technology. We may use or send standard “cookies” to identify your browser from time to time. We do not include any personally identifiable information in cookies and will not employ any other mechanisms (other than those discussed above) to capture data on our Website. We may use both session cookies (which expire once you close your browser) and persistent cookies (which stay on your computer until you delete them). You can accept or decline cookies using your web browser settings. If you choose to disable cookies, some areas of the Website may not work properly or at all. Website does not respond to Do Not Track signals sent by your browser.

We may also collect data about how you use the Website, your browsing actions or patterns, computer equipment, IP address, internet connection, and other similar choices you make, including via Google Analytics and Facebook Pixels, in order to obtain statistical data, improve our Website and offerings, and ensure you receive information relevant to you. If we utilize this technology, we will use them in compliance with all policies of these third-party companies. We may receive personal data from third parties including Google, social media platforms, search engines, PayPal, Stripe, and other third-party payment processing companies.

#### **HOW AND WHY IT’S COLLECTED:**

We collect your personal information when you voluntarily, directly provide it to us to receive a free or paid resource, product, or service, or when you fill out a form or send an email to contact us, and we do so in order to provide you with the resource you have indicated you’d like to receive. We may also track your future interactions with our content, and use your personal information to keep you informed about the products and services you have elected to receive, as well as any linked or similar products or services we think you may be interested in. The information will be collected by us following your choice to manually enter it in and click to be added to our list. No such information will be collected without your taking action to be added to our list, or in exchange for a free resource.

We may also receive data from third parties like Google Analytics, Facebook and other advertising platforms, providers of technical or payment services as needed, and other similar third parties. We do our best to only utilize third parties who have been deemed GDPR-compliant, and whom we have either completed a data processing agreement with or have reviewed and confirmed their policies regarding data processing to ensure compliance.

#### **HOW WE USE YOUR INFORMATION:**

You have the right to know and understand how your information is used. We will use the personally identifiable information you voluntarily give us in order to carry out the service or product you requested, including free resources, trainings, newsletters, periodic promotional emails, and to notify you about any changes to our policies or services. We may also use your personal information to form “look-a-like” audiences in our digital marketing campaigns, which includes uploading your information into our social media advertising campaign.

If you purchase something from us, we will use your billing address and credit card information to complete your desired purchase or purchases only and will not store or share any such information. By providing this information to us, you understand and agree that we may use and store such information to

send emails; bill credit cards in exchange for programs or products purchased or utilize comments for marketing purposes.

If you make a purchase from us, we may also use your personal information to send necessary updates to our products or services you have purchased, or to keep you informed of any necessary information relating to our products or services.

*Non-Personally Identifiable Information:* Additional non-identifying information that is collected may be used to provide an overview of how people are accessing and using the Website; it is not used for any additional purposes, and the Website does not use any such data to make automated decisions. We may also record some or all information to help create a better user experience. We may use information such as your IP address to help diagnose technical problems with servers or our Website, and to determine which portions of our Website receive the most traffic, to understand which content is the most useful to our visitors. Your IP address will not personally identify you and may be used in such limited purposes as outlined above, in order to improve user experience.

#### **HOW INFORMATION IS STORED AND SHARED:**

You have the right to know what information is stored (and not stored) and how it is processed. Your information is stored through a data management system, and it is important to us to take appropriate measures to ensure your information is kept confidential. You understand that there are limited purposes where we will share your confidential information, including with those who are providing technical support for our Website, or those who are members of our team, including legal and accounting. Any parties who will have access to your information will keep such information confidential and will never share with any unrelated parties to the best of our abilities. Information provided by you will never be shared, sold, or given to any other company or person without your consent, other than what is required to complete a purchase or request you have made, unless required to do so by law, or any governmental requirements. We require all such third parties to treat your personal information in accordance with the law, and only allow them to process your personal data for specific, necessary purposes.

Please be aware we may disclose information provided if we are required to do so by law, or if there is an honest, good faith belief that such disclosure is necessary to protect the rights of our Website or of Freedom School Co. that any portion of our policies are being violated, to prevent or mitigate a belief that a crime may be committed, or to protect that safety or rights of our other uses. This information may also be shared as a result of the sale of Freedom School Co. or any branch of the Company, as well as with any joint venture partners or affiliate marketers, should we deem it necessary to share such information. We will always take all reasonable measures to protect and safeguard your information.

This Website, and the servers and parties which made this Website available on a global scale, are located within and operate within Canada. The internet laws of Canada govern any and all matters relating to this Website, including content, as well as the principles of the General Data Protection Regulation (GDPR) as they apply to residents of the European Union. Any information you choose to provide through this Website, including subscribing to a newsletter, opting-in to receive a free gift, or purchasing something will be transferred to Canada for processing. That information may then be transferred within Canada or back out of Canada to other countries outside of your country of residence, depending on the type of information, and how it is stored by us. If transferred to another country, it may not have data protection laws that are as comprehensive or protective as those in your country of residence; however, our collection, storage, and use of your Personal Information will at all times be governed by this Privacy Policy. By visiting our Website, you acknowledge this information, and by submitting any personal information onto our Website, you hereby authorize this transfer and processing of information.

By collecting and using your personal data, we are acting as a data controller, meaning we determine what information is collected, how long it is stored, and what the Personal Information will be used for. We utilize a third-party company to act as a data processor, which stores information such as names and email addresses that make up our email list. To the best of our ability, we have researched and concluded that all third-party data processors we use have advised us they are compliant with the General Data Protection Regulations as well.

#### **YOUR ACCESS TO AND CONTROL OVER INFORMATION:**

You have the right to update, edit, or delete your information from our database. It is also within your right to opt out of any future communications from us at any time by clicking the “unsubscribe” button at the bottom of any email we send you from our list. Should you wish to request access to information that Freedom School Co. has about you, correct or edit any information, or unsubscribe from our email list, and/or remove or delete your information from our database, you also have the option to do so at any time, free of charge, by reaching out to us at via the following email address to: rachael@freedom-school.co:

- See what data we have about you, if any.
- Change/Correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

#### **UNSUBSCRIBE OR OPT-OUT:**

All users and visitors to our Website have the option to discontinue receiving communications from us by way of email or newsletters. To discontinue or unsubscribe from our Website please send an email that you wish to unsubscribe to rachael@freedom-school.co. We will continue to adhere to this Policy with respect to any personal information previously collected.

#### **INFORMATION PROTECTION AND DISCLOSURE:**

We take precautions to protect your information against unauthorized access, unlawful processing, accidental loss, destruction and damage. Any information submitted to us via the Website is protected both online and offline. However, no method of transmission over the Internet or method of electronic storage is 100% guaranteed, therefore we can only guarantee a reasonable level of absolute security of your personally identifiable information.

Wherever we collect sensitive information (such as credit card data), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and/or looking for “https” at the beginning of the address of the Web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

We have determined it is not required to appoint a Data Protection Officer, as our core activities do not consist of processing operations that require regular and systematic monitoring of data subjects nor do we process sensitive categories of data on a large scale.

#### **HOW LONG WE KEEP YOUR INFORMATION:**

The data we collect from you will be stored for no longer than necessary, based on how long your information remains relevant, the length of time it is reasonable to keep records to demonstrate that we have fulfilled our duties and obligations, any limitation periods prescribed by law within which claims might be made, the type of contract we have with you, the existence of your consent and our legitimate

interest in keeping such information as stated in this Policy. In any event, only for as long as the Data Protection Legislation allows.

**CalOPPA COMPLIANCE:**

If you are a California resident you have the right to request information from the Company regarding the manner in which we use and/or store your personally identifiable information and share your information with third parties. You may contact us at the following email address: [rachael@freedomschool.co](mailto:rachael@freedomschool.co).

**GDPR COMPLIANCE:**

In order to ensure compliance with the European Union’s General Data Protection Regulation (“GDPR”) we confirm we have lawful grounds for processing the information we collect from you. If you provide your personal information via our “contact us” page or send us any other form of electronic communication, we will process your data based upon our legitimate interest to respond to user or customer inquiries. If you elect to receive communication from us by “opting in” and provide us with your name and email address in exchange for a free resource or training, or if you purchase from us, we will process your data for the purpose it was collected based on your affirmative consent to do so, and may periodically send you additional email marketing based upon our legitimate interest in marketing to those that have shown an interest in our products or services. We may also give you the option to be added to our email list, in order to receive our newsletter, information about our products and services, and other information we believe may be of interest to you based upon your decision to opt-in to one or more of our free resources, and will obtain your consent to do so. You may withdraw consent at any time by contacting us and requesting your information be edited, updated, or deleted. We do not collect any sensitive data, nor any information regarding criminal offenses or convictions.

The data controller responsible for your personal information for the purposes of GDPR compliance is: Rachael Hunt, [rachael@freedomschool.co](mailto:rachael@freedomschool.co).

**GOVERNING LAW:** Any claim relating to the Company Site shall be governed by the laws of the Province of Ontario without regard to its conflict of law provisions.

**HOW TO CONTACT US:**

If you have any questions or concerns regarding the Policy related to our Website, please feel free to contact us at the following email address: [rachael@freedomschool.co](mailto:rachael@freedomschool.co). If you feel that we are not abiding by this Privacy Policy, you should contact us immediately.