

# **Aiki Canada**

# **Privacy Policy**

Effective Date – December 2021

\*Aiki Canada is a division of 2691397 Ontario Incorporated.

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## About this Privacy Policy

This Privacy Policy has been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). It sets out the rules (PIPEDA 10 fair information principles noted below) by which 2691397 Ontario Incorporated o/a Aiki Canada ("AC") must handle Personal Information as part of its business activities.

This Policy applies to the collection, use or sharing, and retention of any Personal Information collected by AC while conducting its martial arts (self-defense) service business in Canada. By providing us with your Personal Information, you are consenting to the collection, use or sharing, and retention of your Personal Information as set out in this Policy.

## Protecting Your Privacy

Protecting your Personal Information is our priority. At AC, we are dedicated to protecting your privacy and safeguarding your Personal Information, while balancing AC's need to collect, use, and/or disclose your Personal Information in order to fulfill its purposes. While browsing our websites, you do not need to provide any information about yourself. However, if you choose to provide Personal Information to us, we will take the necessary steps to safeguard it to the furthest extent possible.

AC is committed to ensuring that all Personal Information gathered by AC is kept confidential and is treated in a manner that a reasonable person would consider appropriate in the circumstances.

All personal information under the control or custody of AC shall be regarded as confidential and available only to authorized users. Subject to specific limitations and exceptions, you (or your legal representatives) may access your own personal information contained in records under the custody or control of AC following the process outline in this Policy.

## What is Personal Information

"Personal Information" or "Information" – is any information about an identifiable individual, such as age, name, contact information, credit or financial information and references. Personal Information does not include the name, title, or business address or telephone number of an employee of an organization.

## Our Ten Privacy Principles

The ten principles in this Privacy Policy apply to the rules for collection, use and disclosure, safeguarding, retention and disposal of customer Personal Information.

### Principle 1 – Accountability

AC and any of its volunteers, employees and agents are responsible for respecting, maintaining and safeguarding Personal Information under its control as part of AC's business activities, including Information that has been transferred to a third party for processing. In fulfilling this requirement, AC has designated a Chief Privacy Officer who is accountable to oversee compliance with this Privacy Policy.

### Principle 2 – Identifying Purposes

AC shall collect Personal Information for the primary purpose of conducting its martial art business services.

When Personal Information is required to be collected from an individual, AC will, before or at the time of collection, identify and document the purpose for which it is being collected, will explain how it will be used, and will obtain the individual's consent to collect, use, and disclose it. AC will use reasonable efforts to ensure that the individual reasonably understands how the Information will be used and disclosed.

If Personal Information that has been collected is required to be used for a different purpose than originally disclosed, the new purpose will be identified to the relevant individual prior to use. Unless the new purpose is required or permitted by law, such individual's consent will be obtained before the information is used for that new purpose.

We may collect information from you directly, indirectly or from other sources, such as:

- Communications with us (customer or prospective customer)
- Services you requested (customer)

### Principle 3 – Consent

The knowledge and consent of the customer re required for the collection, use, or disclosure of Personal Information except where required or permitted by law.

In determining the form of consent to collect, use, or disclose personal information (implied/express, verbal/written), AC will take into account the sensitivity of the information and applicable legal requirements. Regardless of the form of consent given, AC will ensure that the consent is knowledgeable, voluntary, related to the information in question, and given by the relevant individual.

Consent may be withdrawn at any time, subject to legal restrictions and reasonable notice. If you would like to withdraw your consent to AC's use of your personal information, you can do so by emailing [contact@aikicanada.ca](mailto:contact@aikicanada.ca). A withdrawal of consent will not apply to a collection, use, or disclosure that had occurred prior to receiving the notice of withdrawal.

### Principle 4 – Limiting Collection

The collection, use, and disclosure of your Personal Information will be limited to that which is necessary to fulfill the purposes identified by AC. Information must be collected by fair and lawful means. The type of Personal Information we collect depends on the nature of your request. This includes but is not limited to advertising on our website and/or purchase of one of our service programs. Please also see Principle 2 noted above.

### Customers Personal Information

AC will collect Personal Information from customers and contact information that allows us to communicate with them, such as your name, address, telephone number and email address. In addition, applicable billing and payment information may be collected in order to facilitate the purchase of AC's services.

You are welcome to browse our websites at any time anonymously and privately without revealing any personal or financial information about yourself. Personal Information is not collected that could identify you personally unless you consent to provide it.

## Principle 5 – Limiting Use, Disclosure and Retention

Unless the individual consents otherwise or it is required by law, Personal Information can only be used or disclosed for the purposes for which it was collected. AC may provide Personal Information to third parties when consent to do so has been provided and/or when AC is required or permitted to do so by law and/or AC wants to defend the rights or property of AC including its related website.

AC will only keep Personal Information for as long as necessary to fulfill its intended purpose or to satisfy legal or regulatory requirements. Personal Information will be disposed of by means of a shredding or other secure disposal method, with care taken to prevent unauthorized parties from gaining access to the Information.

## Principle 6 – Accuracy

It is critical that Personal Information provided to AC is accurate, complete, and up to date as necessary to fulfil the purposes for which it is to be used by AC. If you discover inaccuracies in our records, or your Personal Information, please contact our office, so we can make the necessary changes. Ultimately, you will be responsible for ensuring that AC has your current and complete Personal Information in AC's records. AC will not routinely update Personal Information, unless such a process is necessary to fulfill the purposes for which the Information was collected.

## Principle 7 – Safeguarding Client Information

Personal Information (physical or electronic) you provide through consent to us will be securely maintained and kept confidential. We use a variety of technologies and security standards/protocols to protect your information from unauthorized use, disclosure, modification, disposal, loss and theft of information, misuse, or destruction, regardless of the format in which the Information is held.

The methods of protection may include the following:

- locked filing cabinet;
- restricted access to customer files;
- confidentiality agreements with staff and volunteers.

Your information may be shared, stored, or accessed in Canada where AC maintains an office.

If Personal Information is stolen, lost, or accessed by an unauthorized person, AC will notify the relevant individual(s) and/or other third parties (such as the Privacy Commissioner) at the first reasonable opportunity, if required to do so by applicable law.

AC does not sell, rent, or lease customer lists to third parties.

## Principle 8 – Openness

AC is required to inform customers of the policies and practices that apply to the management of their Personal Information.

## Principle 9 – Client Access

Upon written request, and proof of identification, AC will inform an individual whether or not AC holds Personal Information about the individual. AC will allow the individual to access this information in accordance with applicable legislation. Certain situations will prevent AC from providing access to personal information, including for legal, confidentiality, or security reasons; in such situations, AC will

give a written notice to the individual that states that the request for access is being refused, provides reasons for the refusal, and informs the individual that he/she is entitled to make a complaint about the refusal to the Office of the Privacy Commissioner of Canada. AC will respond to a request for access within thirty (30) calendar days of receipt of the request, unless extensions are permitted under law and AC has informed the individual of the length and reason for the extension.

If an individual informs AC about the inaccuracy or incompleteness of his/her personal information, AC will respond to the correction request, with the amendments, within thirty (30) days of receiving the request, unless extensions are permitted under law and AC has informed the individual of the length and reason for the extension.

In certain circumstances, AC will not correct a record of personal information, if prohibited from doing so under law. If a correction is refused, AC will inform the individual of the refusal, the reasons for the refusal, the individual's right to file a complaint regarding the refusal to the Office of the Privacy Commissioner of Canada, and the right of the individual to attach a statement of disagreement to AC's records (so that any other organization that has access to the Information can view the statement).

### Principle 10 – Handling Client Complaints and Suggestions

Customers may direct any questions or concerns with respect to the privacy principles outlined above by contacting AC's Chief Privacy Officer (noted below).

AC's Chief Privacy Officer is available to answer any questions an individual may have about AC's collection, use, disclosure, and retention of Personal Information, or to register a complaint. An individual whose personal information is held by AC has several other avenues of recourse, including registering a complaint with the Office of the Privacy Commissioner of Canada. AC is committed to investigating all complaints and taking appropriate action.

### Children under Fifteen

The AC website was not intentionally designed or directed at children fifteen (15) years old or younger. Being especially committed to protect children's privacy in an on-line environment, we do not knowingly collect or maintain Personal Information from children.

### Do you have Questions or Concerns?

If you have any questions or concerns, please contact us either by email or in writing:

Email: [contact@aikicanada.ca](mailto:contact@aikicanada.ca)

Write to:

Chief Privacy Officer,

Aiki Canada

144 Fernhill Boulevard,

Oshawa, On L1K 5J3

## Updating This Policy

The date at the top of this Privacy Policy indicates when the document was last updated. This Policy is expected to change as the body of knowledge in this area grows and as the environment within which AC operates evolves. AC will post and explain any changes to this Privacy Policy as soon as they go into effect.

## Websites Governed by this Policy

The AC website is governed by the provisions and practices stated in this Privacy Policy are:

- aikicanada.ca

AC website provides martial art (self-defense) services to customers.

## Links to Third-Party Websites

While providing links to other third-party websites, we do not guarantee and cannot be responsible for the information collection and privacy practices of such third-party websites, which may differ from our site's policies. For further information, refer to our Terms of Use Policy.

## Cookies We Use

Cookies are text files that are stored in the internet browser or by the internet browser on the user's computer system. If a user accesses a website, a cookie may be stored on the user's operating system. That cookie contains a string of characters (cookie ID) that enables clear identification of the browser and recognition of the user when the website is visited again. This website does not use any of these types of cookies.

Our websites track and collect various general data and information whenever they are accessed by a data subject or automated system. Those general data and information are stored in the log files of the server. The following data may be collected:

- browser types and versions used,
- the operating system used,
- the website from which a system accesses our website,
- the subpages that the system accessing our website navigates to,
- the date and time of access to the website,
- the IP address,
- the internet service provider of the system accessing the website, and
- other similar data and information that serve to protect our information technology systems in the case of attacks.

The collection and use of the general data and information do not allow any conclusions to be drawn about the data subject. Instead, they serve the following purposes:

- correct provision and display of the content of our website
- optimization of the website content and advertising the website
- ensuring the long-term functionality of our website
- provision of the necessary information to assist law enforcement authorities in the event of a cyber-attack. The anonymous data stored in the log files are stored separately from any personal data.

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