

**TOTALLEADER SOLUTIONS INC.  
PRIVACY POLICY  
(AS OF JUNE 6, 2017)**

TotalLeader Solutions Inc. (“**TotalLeader**”) is committed to protecting and preserving your privacy. Please read this Privacy Policy carefully to fully understand how we collect, share, and protect information about you.

You control how your personal information is collected, used and disclosed. Other than is necessary to provide you with the service you expect from TotalLeader (as explained in this document and when you use the website), TotalLeader gives you control over your personal information. TotalLeader does not, and will not, sell or commercially distribute your personal information without your consent.

TotalLeader respects your privacy by meeting or exceeding standards set by law. Our privacy commitment is based on the ten principles of the Canadian Standards Association Model Code for the Protection of Personal Information, all of which are enshrined in law in the *Personal Information Protection and Electronic Documents Act (Canada)* (“**PIPEDA**”).

This privacy commitment adopts the definition of personal information from PIPEDA: “personal information” means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization.

In most cases where TotalLeader is called upon to handle personal information, it is in the course of providing services to you and your employer, including analysing information you provide to TotalLeader through our website and providing reports and other analyses of that information to you and your employer, including, without limitation, in connection with our TotalLeader® Management Training and LeadershipStages® Assessment training programs (the “**Services**”).

This privacy commitment applies to all collection, use, and disclosure of personal information by TotalLeader about current, past and prospective clients. It does not apply to third-party personal information that TotalLeader may handle when it acts as an agent handling the personal information on behalf of a third party.

### **Website Privacy Notice and Consent**

By accessing and using our website, you agree that you have read and understand this Privacy Policy. You accept and consent to our privacy practices, as well as the uses or disclosures of information about you that are described in this Privacy Policy.

### **How Do You Get My Consent?**

When you provide us with personal information necessary to providing the Services (e.g. to complete an online assessment), to complete a transaction, to verify your credit card, or to place an order, we imply that you consent to our collecting it and using it for that specific reason only.

If we ask for your personal information for a secondary reason, like marketing, we will always ask you for your consent and/or ask you to opt-in to receive commercial electronic messages.

### **How Do I Withdraw My Consent?**

You may withdraw your consent for us to (1) send you commercial electronic messages as understood by Canada's Anti-Spam Law ("**CASL**"), or (2) collect, use or disclose your personal information, at any time, by contacting us at [jonathan@totalleadersolutions.com]. However, your withdrawal of consent may mean that we may not be able to provide the Services effectively to you.

### **Why Do We Collect Your Personal Information?**

We collect your personal information in order to (1) provide or offer the Services (such as to assess yours and your organization's needs and capabilities and provide coaching and other assistance as part of our TotalLeader® Management Training and LeadershipStages™ Assessment training programs), (2) to field inquiries through our website; and (3) for use in researching and further developing our business systems and operations, including our assessment and training programs.

### **How Do We Collect Your Personal Information?**

We only collect personal information that is reasonably necessary for the legitimate purposes identified and for which consent has been obtained. Whenever possible, we collect your personal information directly from you, or from persons you have requested to provide us with such information.

In operating our website, we may collect and process the following data about you:

- (i) When you provide background information to us about your organization so that we can provide you with the Services, we collect the personal information you give us such as your name, address, and email address;
- (ii) Information you provide when you complete any online assessments through our website;
- (iii) other information that you provide directly to us by filling in forms on our website (such as our "Contact Us" form); and
- (iv) information provided to us when you communicate with us for any reason.

### **How Do We Use Your Personal Information?**

The information that we collect and store relating to you is primarily used to enable us to provide the Services to you and your employer in the best possible manner.

In addition, we may use the information for the following purposes:

- (i) to provide you with information relating to the Services;
- (ii) to follow up on client or user comments and suggestions;
- (iii) to manage and develop our business systems and operations, including our analytical and coaching methods and practices; or
- (iv) to monitor and conduct an analysis of our website's traffic and usage patterns.

When you browse our website, we also automatically receive your computer's Internet Protocol (IP) address in order to provide us with information that helps us learn about your browser and operating system.

Email marketing (if applicable): With your express permission, and in compliance with CASL, we may send you emails and/or other updates about the Services or future program offerings.

### **When Do We Disclose Your Personal Information?**

We will only disclose your personal information for the legitimate purposes identified to you and for which consent has been obtained, or if required or authorized by law. For example, we may disclose your information:

- (i) to your employer in connection with our performance of the Services;
- (ii) where it is necessary to establish or collect fees or payment;
- (iii) if a court issues a subpoena; or
- (iv) if we engage a third party to provide administrative services for our benefit, in which case we shall use contractual or other means to protect the personal information that is being provided to the third party.

Since our clients sometimes take a break from using our Services but later return and expect to be able to access their past information when they do, we never destroy your records unless you request us to do so in writing. If you want to make a request for destruction of your records, please contact our designated privacy contact person, listed at the end of this policy. . .

### **What About Third Parties?**

In general, any third-party providers used by us will only collect, use, and disclose your information to the extent necessary to allow them to perform the services they provide to us.

However, certain third-party service providers, such as payment gateways and other payment transaction processors, if any, will normally have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers, as we have no responsibility or control over how they handle your personal information. Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy.

In particular, remember that certain providers may be located in or have facilities that are located a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under U.S. legislation, including the *Patriot Act*.

When you click on links on our website, they may direct you from our site. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements.

### **Security**

To protect your personal information, we have put in place physical, electronic, and managerial procedures to safeguard and secure the information we collect on our website to make sure it is not inappropriately lost, misused, accessed, disclosed, altered, or destroyed. Such measures will vary depending on the sensitivity, amount, format, nature, and storage of the personal information.

If, at any time, you provide one of our third-party payment gateways or payment transaction providers with your credit card information, you acknowledge that no method of transmission over the Internet or electronic storage is 100% secure, meaning transmission of such data is therefore entirely at your own risk..

### **Age of Consent**

By using this site, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence and you have given us your consent to allow any of your minor dependents to use this site.

### **Updating Your Information and Correcting Errors**

Since we use your personal information to provide the Services to you and your employer, it is important that the information be accurate and up-to-date.

If any of your information changes, is inaccurate, or is incomplete, please inform us so that we can make any necessary changes.

### **Access to Your Personal Information**

We will respond promptly to any request for access to, or correct, your personal information. There will be no cost for reasonable requests to such access or correction, unless you request copies of records or your request involves significant retrieval costs. We will advise you of the cost, if any, prior to the retrieval of such records or information. We will not respond to requests for access to personal information that are frivolous, vexatious, or repetitious.

In certain circumstances, we may be unable to provide access to some or all of the personal information that we hold about you. Such circumstances include those where the personal information cannot be separated from the records of others, cannot be disclosed for reasons of personal security or commercial confidentiality, or is protected by professional standards relating to confidentiality or solicitor-client privilege.

### **Changes to this Privacy Policy**

We reserve the right to modify this privacy policy at any time without notice to you, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website.

### **Contacting Us**

If you would like to (1) access, correct, amend or delete any personal information we have about you, (2) register a complaint, or (3) simply want more information about our privacy practices, contact our designated privacy contact person, Jonathan Creaghan, at [jonathan@totalleadersolutions.com].