

Last updated: January 2021.

Grief Advocacy (GA) is committed to protecting the confidentiality of personal information in its custody and control. The purpose of this Privacy Policy is to ensure that your personal information is protected in accordance with the relevant privacy laws and to ensure that all of our practices and procedures are compliant in that regard.

By visiting our website (the “Website”), submitting information to us or interacting with GA, you agree to the collection, use and disclosure of your Personal Information, as set out in this Privacy Policy, as updated from time to time. Accordingly, you should review this Privacy Policy from time to time to keep informed of such amendments. The most recent date of revision will be indicated prominently at the top of the Privacy Policy.

Personal Information is any information about you as an identifiable individual, such as your name, address, postal code/zip code, telephone number and e-mail address. GA may also collect Non-Personal Information, being information that cannot be associated with an identifiable individual, such as aggregated statistical information (e.g. the average length of time users spend visiting our Website), or other anonymous information, such as the type and version of browser being used to access the Website.

1. Accountability

We are responsible for personal information in our possession or under our control.

Our appointed Privacy Officer is responsible for compliance with the provisions of the Privacy Policy. Our Privacy Officer can be contacted by using the contact information at the end of this Policy. Other individuals within our organization may be delegated to act on behalf of our Privacy Officer or to take responsibility for the day-to-day collection and processing of personal information.

2. Identifying the Purposes for the Collection of Personal Information

We identify the purposes for which personal information is collected.

We will collect personal information for the following purposes:

- to establish and maintain responsible relations with our users, including communications;
- to operate and provide our ongoing services to users;
- to understand and meet user needs and preferences;
- to study and research matters related to our services;

- to manage, monitor, regulate and protect our services and operations;
 - to contact and deal with providers;
 - to meet legal and regulatory requirements
3. Unless permitted or required by law, we shall not use or disclose your personal information for any new purpose without first identifying and documenting the new purpose and obtaining your consent.
4. **Obtaining Consent for Collection, Use or Disclosure of Personal Information**

The knowledge and consent of an individual are required for the collection, use or disclosure of personal information, except where inappropriate or otherwise permitted by law.

Your knowledge and consent is generally required for the collection, use, or disclosure of personal information, except where inappropriate or otherwise permitted by law. In certain select circumstances, as provided under applicable privacy law, personal information can be collected, used or disclosed without the knowledge and consent of the individual.

We may also collect, use, or disclose personal information without your knowledge or consent if seeking consent might defeat the purpose of collecting the information; such as in the investigation of a breach of an agreement or duty, a contravention of a federal or a provincial law, or where the life, health or security of an individual is threatened.

We may also collect, use, or disclose personal information without your knowledge or consent to a lawyer representing us in proceedings such as to comply with a subpoena, warrant or other court order, or as may be required or authorized by law.

Generally we will seek consent to use and disclose personal information at the same time as or before we collect the information. However we may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.

5. **Limiting the Collection of Personal Information**

We will limit the collection of personal information to that which is necessary for the purposes that we have identified. We will collect personal information by fair and lawful means.

We limit the information we collect to that which is necessary to deliver a high level of service.

We generally collect personal information directly from our users, but we may also collect personal information from other sources including government agencies or registries, your agents or representatives, third parties engaged to provide us with information related to the services we are providing, or other third parties that represent that they have the right to disclose personal information about you.

We may collect some or all of the following personal information when you conduct business with us:

- Name, address and telephone number;
- Email address and facsimile number;
- Key personnel information, including all contact information of those persons;
- User needs and preference information;
- Research based information gathered from you in the course of the services we provide;
- Third party agent or representative information including reports or data prepared or gathered about you required by us for provision of our services;
- Government or registry data about you required by us for provision of our services or products

6. Limiting Use, Disclosure and Retention of Personal Information

We will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. We will retain personal information only as long as necessary for the fulfillment of the purposes for which it was collected.

We will retain your personal information for the purposes for which the information was collected and shall maintain such information as we may be required to do so for that purpose or for which we may be required by law.

We will maintain reasonable and systemic controls and practices to apply to personal information that is no longer necessary or relevant in order to identify it and securely destroy it or otherwise render it unintelligible.

We may disclose your personal information to:

- A third party that is involved in supplying us with products or services related to the services that we are providing to you;
- A third party that we have engaged to perform functions on our behalf, such as delivery services, record keeping or storage services, professional services such as financial, legal, or other similar professional services;
- A person who in our reasonable judgment is seeking the information as your agent, contractor or advisor, such as your financial, legal or other professional advisor;
- A public authority or agent of a public authority as may be required or permitted by law;
- With appropriate contractual safeguards, to a third party as part of a contemplated or actual transaction involving Grief Advocacy such as a merger, acquisition, or sale, which would necessitate the transfer of personal information to the prospective or actual purchaser, or their authorized

representatives, involved in the transaction or contemplated transaction

7. Note that personal information may be stored or processed in the cloud or outside of Canada, where it will be subject to the legal regime of the destination country. For access to written information about GA's policies and practices with respect to service providers outside of Canada, please contact our Privacy Officer, at the address provided below.

8. **Accuracy of Personal Information**

Your personal information shall be accurate, complete and up to date as is necessary for the purposes for which it is to be used.

We rely primarily on data you provide to us directly. In our efforts to maintain the accuracy of your personal information, we ask that you contact us with any changes in your personal information that may occur over the course of your relationship with us.

If you have concerns about the accuracy of the personal information we retain, please contact our Privacy Officer.

9. **Security Safeguards**

We will protect your personal information by security safeguards appropriate to the sensitivity of the information.

We will use appropriate security measures to protect personal information against the risks of loss or theft, unauthorized access, disclosure, use, copying or modification. Methods of protection will include physical, organizational and technological measures.

Where your personal information is shared with third parties, as contemplated in this Privacy Policy, we will protect your personal information by contractual agreements or other means stipulating the confidentiality of the information and the purposes for which it is being used.

10. **Openness Concerning Practices and Policies**

This Privacy Policy shall always be readily available to users or others who request a copy.

If you would like a copy of this Policy please contact our Privacy Officer.

11. **User Access to Personal Information**

We will inform you of the existence, use and disclosure of your personal information upon request, and will give you access to such information where required. You have the right to challenge the accuracy and completeness of the personal information and request to have it amended as appropriate.

Upon written request, we will inform you of the existence, use and disclosure of your personal information. Personal information will be provided in a reasonable period of time and, if necessary, at an appropriately reasonable cost.

In certain situations, we may not be able to provide access to all the personal information that we hold about you. For example, we may not

reveal information that would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, we may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or duty or a contravention of a federal or provincial law. If access to personal information cannot be provided, we shall provide the reasons for denying access upon request.

12. Challenging Compliance

You have the right to address a challenge concerning compliance with the above principles to our Privacy Officer.

We wish to ensure that our Privacy Policy meets your concerns and responds to your needs. If you would like to discuss your personal information our Privacy Officer is available to receive your enquiries, comments and complaints.

Our Privacy Officer may be contacted at:

Grief Advocacy

554 Gladstone Ave

Toronto, ON M6H 3J2

Canada

Email: hello@griefadvocacy.com