

## PRIVACY POLICY

### PROTECTING YOUR PRIVACY

This Privacy Policy applies to Spiritual Athlete Enterprises Ltd. (the “**Company**”, “**we**”, “**us**”, “**our**” and similar terms) and this website (this “**Site**”) and explains how we collect, use, and disclose personal information in Canada, including by way of this Site. In general, “personal information” is information about an identifiable individual, subject to more particular definitions or interpretations under applicable law. This Privacy Policy does not apply to any information that is not personal information as defined in or interpreted under applicable law. The Company provides this Site and offers and provides services and information to a wide range of clients. We collect, use, and disclose personal information as necessary to offer and provide clients and potential clients with these services and information and generally to manage our business.

### THE INFORMATION WE COLLECT AND HOW WE USE IT

The kinds of personal information we collect and use in relation to clients and potential clients will depend upon the information and services requested. However, subject to applicable law, it may include:

- name, address, email address, contact details, nature of the client, or potential client’s business, billing and account information, and other incidental information relating to the services we provide;
- areas of interest, for instance, when you sign up for our email newsletter or when you request receipt of materials concerning our services;
- information about individuals we collect in the course of acting for clients;
- information about you contained in communications within the Company and between us and you, whether online or offline; and
- information we may collect with your consent or as permitted or required by law.

We use this information:

- to offer and provide information and services to you;
- to communicate with you regarding the services you request and to respond to your requests and enquiries;
- to administer our client time and billing databases and issue and collect accounts;
- to provide you with material on our services and to invite you to the Company functions;
- to manage and administer our business; and
- as permitted or required by law or for purposes for which you otherwise provide your consent.

If you do not wish to receive further materials about our services or if you do not wish to receive further invitations to seminars and functions, you may unsubscribe or ask us not to contact you for these purposes.

## **SERVICE PROVIDERS**

The Company may collect information about third-party agents, vendors, suppliers, and foreign associates (each, a “**Service Provider**”) who provide goods, services, and information to the Company. This information may include name and contact information as well as any information (such as banking information) that we need to pay you for your services and other relevant information, such as experience and qualifications of Service Providers. We use this information in order to assess suitability for particular assignments, to contact you, where necessary, in relation to the goods, services and information you are providing to the Company, and to pay you for your services. We may also use this information to provide you with material regarding our services or to invite you to the Company seminars and functions. If you do not wish to receive further materials about our services or if you do not wish to receive further invitations to seminars and functions, you may unsubscribe or ask us not to contact you for these purposes.

## **HOW WE COLLECT INFORMATION ABOUT YOU**

We typically collect personal information directly from you or through our interaction with you. However, sometimes we may obtain personal information about you from other sources.

## **HOW WE DISCLOSE AND SHARE YOUR INFORMATION**

We may disclose the personal information we collect about clients or other individuals we deal with to third parties, including:

- where we are required or authorized by law to do so;
- where it is necessary to collect fees, for instance, to a financial institution or collection agent;
- to regulatory or governmental authorities;
- where you have instructed us to disclose your personal information to a third party for a designated purpose;
- where we reasonably believe a third party requesting your information is your agent; and
- where you consent or as permitted or required by law.

The Company may also transfer your personal information to Service Providers hired to administer or provide products, services or information on our behalf. We use reasonable measures to require the organizations with whom we share your personal information for these purposes to use your personal information only to perform the services we have hired them to provide. Note that some of the Service Providers that process or handle personal information on our behalf may be located outside of Canada. As a result, your personal information may be transferred, stored and/or processed outside Canada in connection with the purposes described

in this Privacy Policy. Contractual or other measures we may use to protect your personal information are subject to the legal requirements of the foreign jurisdictions where your personal information may be transferred, stored or processed.

## **OUR WEBSITE**

The only personal information that we collect about you when you use our website is what you tell us about yourself, for example, by completing an online form when you request receipt of a Company publication, or information you provide to us through the [Contact](#) page or by way of the “Book a Call” button or when you send us an email. As most websites do, we track usage patterns on our website on an anonymous basis. Your identity cannot reasonably be ascertained from this information. Each time you visit our website, our server records your Internet service provider, the date and time of your visit, the pages you visit, the documents you download, the searches you performed, and the referring URLs you came from. We use this non-personal information to optimize our website service. For your convenience, we may offer links from our website to other websites. However, the Company is not responsible for, nor do we accept any liability for, the personal information collection, use, and disclosure practices of other entities to which our website may link. You should consult the privacy policies of these other entities before providing any personal information on their websites.

## **YOUR CONSENT**

We collect, use and disclose your personal information with your consent or as permitted or required by law. Your consent may be express or implied, depending on the circumstances and the sensitivity of the personal information in question. For example, in most cases, a client's consent to the collection, use, and disclosure of personal information by the Company may be implied by the fact that the client has engaged the Company to provide services, where the collection, use, and disclosure of personal information relates to the performance of those services. If you provide personal information about another person to us, we assume you have the consent of that individual to enable us to collect, use, or disclose their information as described in this policy. If you choose to provide personal information to the Company, we assume that you consent to the collection, use, and disclosure of your personal information as outlined in this Privacy Policy. If you do not consent, please do not provide your personal information or, where applicable, exercise the opt-in or opt-out options offered. Subject to legal and contractual requirements and reasonable notice, you may refuse to consent to our collection, use and disclosure of your personal information or you may withdraw your consent to our further collection, use, and disclosure of information about you, by contacting us via email at [jill@jillpayne.ca](mailto:jill@jillpayne.ca) or the [Contact](#) page. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide certain of our services. There are instances where the Company may collect, use, or disclose your personal information without your consent, for example, to collect a debt you owe to us, to comply with a subpoena or court order, or to comply with the rules of court regarding the production of records.

## **SECURITY**

The Company has implemented reasonable physical, organizational, and technological security measures to safeguard the personal information in our custody or control. These include safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Only our authorized personnel have access to your

personal information. You can generally visit the Company website without providing any personal information. However, given that electronically submitted data is not one hundred percent (100%) secure, we make no warranties as to the security of any such personal information that you submit, which you do at your own risk.

## **ACCESS, CORRECTION, ENQUIRIES, AND COMPLAINTS**

We maintain a file of your personal information for the above-mentioned purposes. If you wish to request access to, or correction of, your personal information in custody or control of the Company, please make your request in writing by contacting us via email at [jill@jillpayne.ca](mailto:jill@jillpayne.ca) or the [Contact](#) page. We may need to verify your identity before searching for or providing you with personal information. In some circumstances, we may not provide access to your personal information, for example, if it contains the personal information of other persons, if it constitutes confidential commercial information, or if it is otherwise not properly the subject of an access request. Since we predominantly use personal information to provide our services, it is important that the information be accurate and up to date. Please inform us as soon as possible of any changes to your personal information. If you have any questions, requests or complaints about our personal information practices, please contact us via email at [jill@jillpayne.ca](mailto:jill@jillpayne.ca) or the [Contact](#) page.

## **CHANGES TO THIS STATEMENT**

The Company reserves the right to change this Privacy Policy at any time. You should review this Privacy Policy from time to time to ensure that you are aware of and accept any changes made. You may contact us at the address, email address, or telephone number above to obtain a current copy of this Privacy Policy.

**Last updated:** [Date]