

## **Privacy Policy**

Your privacy and the integrity of any information you provide are important to us. We have developed the following policy pursuant to the Personal Information Protection and Electronic Documents Act, 2000 c.5. (the "Privacy Act").

This policy is designed to inform you of how and why Louise Russo W.A.V.E. gathers personal and non-personal information about you on its websites.

This Policy applies to all employees, individuals using our products and services and to certain persons with whom Louise Russo W.A.V.E. has contracted.

Our web sites are connected by "hyperlinks" to other web sites. We are not responsible in any way for the privacy practices on other web sites and suggest that you review the privacy policies on those linked web sites before using them.

### **What is Personal Information?**

Personal information is any piece of information about an identifiable individual. Personal information does not include the name, title, business address, or business telephone number of an employee of an organization. ("Personal Information").

### **Applicability of Louise Russo W.A.V.E.'s Privacy Policy**

Louise Russo W.A.V.E.'s Privacy Policy informs you of our commitment to protecting Personal Information. It tells you the ways we ensure that Personal Information we collect on the websites is protected.

The terms, "we", "us" and "our" means Louise Russo W.A.V.E.'s staff, and our authorized contractors, consultants and suppliers. "You" and "your" means the individual who is a customer (by virtue of viewing our materials or using our online services), employee or arm's length contractor of Louise Russo W.A.V.E. Our Privacy Policy applies to protect Personal Information in our possession and control.

#### **1. We are accountable**

At Louise Russo W.A.V.E., we take our commitment to securing privacy very seriously. Each employee and representative of Louise Russo W.A.V.E. is responsible for the Personal Information under his, her or its control. They are informed about the importance of privacy and are updated about our Privacy Policy and related policies.

#### **2. We will identify how personal information will be used**

Whenever we collect information about you, we will explain how we intend to use it. We will limit the information we collect to what we need for those purposes, and for no other purpose. We will always seek your consent.

#### **3. We will confirm your consent**

We will confirm your consent to the collection, use or disclosure of Personal Information at the time of collection or in advance. Consent may be expressed in writing or implied, and in some cases, you may provide it verbally, electronically or through your authorized representative.

Upon request, we will explain your options regarding refusing or withdrawing consent to the collection, use and disclosure of Personal Information, and we will record and respect your written choices. However, your decision to withhold particular details may limit the services we are able to offer to you. Any refusal or withdrawal of consent may be subject to any overriding legal requirements or commitments.

#### **4. We will limit the collection of Personal Information**

Personal Information is collected by Louise Russo W.A.V.E. only for specific, limited purposes.

When you visit our websites, information is not collected that could identify you personally unless you choose to provide it.

## **5. We will limit use, disclosure and retention**

The information we request from you is used only in accordance with purposes set out and in accordance with legislative requirements. If necessary, we will seek your consent before using the information for purposes beyond the scope of your original consent.

We will retain Personal Information only as long as is required for the purposes we describe and as is required under law. Once Personal Information is no longer required (or if you have opted-out or withdrawn consent), it is our practice that it is destroyed, deleted or made anonymous.

## **6. We will strive to have accurate records**

All decisions we make involving Personal Information is based on accurate, complete and up-to-date information. However, we rely on you to disclose all material information and to inform us of any relevant changes or corrections as they may relate to you.

We encourage you to contact us as soon as possible and we will make the appropriate reasonable corrections or amendments, upon receipt of appropriate evidence.

## **7. We will protect Personal Information**

We will protect Personal Information with appropriate safeguards and security measures. We utilize a combination of physical, administrative and electronic measures to ensure Personal Information is adequately protected on a day-to-day basis, for storage and disposal.

Access to Personal Information is limited to those authorized by Louise Russo W.A.V.E. Louise Russo W.A.V.E.'s computer systems are password-secured or firewall protected and constructed in such a way that only authorized individuals may access these systems. To safeguard against unauthorized access to Personal Information via the Internet, you may be required to sign-on and go through a security protocol.

If you send us an e-mail message that includes Personal Information, we will use that information to respond to your inquiry. Please note that email is not necessarily secure against interception.

## **8. We will provide you with access**

We will provide you access to the information we retain about you within a reasonable time, upon written request, satisfactory identification and proof of entitlement. We will respond to you within 30 days of receiving your proper written request.

In some very limited circumstances we may deny you access to Personal Information. If we deny your individual request for access to your Personal Information, we will advise you, subject to any legal requirements, in writing of the reason for the refusal.

## **9. We will be in compliance**

Louise Russo W.A.V.E. encourages you to contact us with any questions or concerns you might have about Personal Information or this Privacy Policy. You can reach us by email or by mailing us your questions, concerns or requests at the following:

### **What Information Is Collected?**

Louise Russo W.A.V.E. collects three kinds of information from our web sites:

1. your voluntarily provided personal information;
2. anonymous information about your visit, and
3. "cookie" based information to help us track which pages on our web site(s) you're most interested in.

## **1. Your Personal Information**

During normal website usage, you can visit our site without communicating any personal information. However, to make use of certain features on our sites, such as on-line registration, promotions, personalized services, or newsletters, users may be asked to register with the Louise Russo W.A.V.E. website(s). As part of this voluntary registration, Louise Russo W.A.V.E. may request contact information (such as name, mailing address, e-mail address, etc.) and other data required for operating these services. The only way we can collect personal

information from you is if you voluntarily provide it. By voluntarily providing this personal information to us by sending us a comment or suggestion, by entering a chat room or bulletin board, or by entering a contest that is posted on our web site(s), you will be consenting to the collection, use and distribution of your personal information by Louise Russo W.A.V.E. for the purposes set out in each case or other purposes that we advise you of. You are under no obligation to provide us with personal information and can access and enjoy many parts of the Louise Russo W.A.V.E. web sites without providing us any personal information. Among other things, the following is a representative list of reasons we may ask for your personal information:

- To run its suite of programs and provide participants with news and information about those program
- To respond to your questions or the comments you e-mail to us;
- To provide you with newsletters or other information about our programming, special offers or services;
- To distribute to sponsors who fund Louise Russo W.A.V.E.'s programs and resources to keep them informed of Louise Russo W.A.V.E.'s progress;
- To keep aggregate information on web site(s) use

You should be aware that when you share personal information in public areas of our web site(s), such as chat rooms, discussion groups or bulletin boards, this information might be seen and used by other members of the public. We urge you to exercise good judgment when sharing personal information in these forums.

## **2. Anonymous Information About Your Visit:**

When you visit our site, information about your visit (e.g. how you navigate the site) may be collected and stored. This information may include the length of your visit, the date and time of your visit, the pages you look at and the sites you visit before and after leaving our site. It does not include personally identifiable information such as your name, mailing or e-mail address or telephone number. We use this non-identifiable and aggregate information to better design our Web site(s). We also may share this information with our donors, sponsors and suppliers. In addition to the non-identifying information described above, we collect the following non-identifying information when you visit our web site(s):

- Your IP address
- Your Internet Service Provider (ISP)
- Your Web Browser 3.

## **3 "Cookie"-Based Information:**

To tailor our site to the needs and interests of our visitors, we keep track of the pages visited by our users by placing a small text file, called a "cookie", on your hard drive. A cookie is transferred to your browser by a Web server and can only be read by the server that gave it to you.

Cookies do not reveal personal information. The only information a cookie can contain is information you supply yourself such as passwords, purchases and preferences. Cookies cannot read data from your hard drive.

You may visit the site with your cookies turned off. However, you may not be able to access some of the areas of our site, which require cookies for customization and personalization.

## **What If I Do Not Agree With Your Privacy Policy?**

By visiting our web site(s) and voluntarily providing personal information to the Louise Russo W.A.V.E. web site(s), you agree to the terms of this online Privacy Policy.

We take reasonable precautions to keep the information that we collect through our websites secure, including organizational, physical and electronic precautions. However, we welcome your comments and/or suggestions on improving our web site(s) and policies. If you do not agree to these terms, or wish to limit the use of any of your personal information that we may have, you may contact us at [info@louiserusso.wave.ca](mailto:info@louiserusso.wave.ca).