

PRIVACY POLICY

Last Updated on April 24, 2021.

Debt Coach Silverthorn (“Firm”, “we”, “our” or “us”) respects your privacy and is committed to protecting it.

This Privacy Policy governs your access and use of our website, www.debtcoachsilverthorn.ca, including any content, functionality or services offered through our website or related landing pages (collectively, “Site”) whether as a guest or a registered user. In this Privacy Policy “you” or “your” refers to any individual who accesses our Site.

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING OUR WEBSITE

This Privacy Policy is legally binding. **By using our Site or by clicking to accept or agree to the Terms of Use and Privacy Policy when this option is made available to you, you expressly accept and agree to be bound and abide by this Privacy Policy.** If you do not agree to the Privacy Policy, you must not access or use our Site or Services.

This Privacy Policy sets out how we collect information from you when you visit our Site, either automatically, or through certain voluntary actions you may take while visiting our Site, including but not limited to, accessing, purchasing or downloading any products, content or resources available on our Site or engaging or interacting with us either through this Site (collectively, “Services”).

This Privacy Policy applies to information we collect:

- On this Site;
- In email, text and other electronic messages between you and this Site;
- When you interact with us, our advertising and applications on third party websites and services if those applications or advertising include links to this Privacy Policy.

This Privacy Policy does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by us, or any third party including our affiliates and subsidiaries; or
- Any third party including through any content or advertising that may link to or be accessible from or on the Site.

This Privacy Policy also sets out how we use and disclosure your information and your rights with respect to your personal information that we collect.

Use of Site

You must be at least 16 years old to use our Site. No one under the age of 16 may provide any information to or on our Site. We do not knowingly collect, use or disclose personal information about visitors under 16 years of age. If you are under 16 years of age you must immediately stop using our Site and not provide any information to us through any function on our Site. If you become aware that we have collected information from anyone under the age of 16 please contact us at markasilverthorn@gmail.com so we may delete that information.

INFORMATION WE COLLECT

We collect certain types of information from you when you visit our Site. By accepting this Privacy Policy, you are expressly consenting to (i) our collection of information as described below; (ii) our use of the information collected; (iii) the processing of this information; and (iv) our sharing of data with third-party processors as needed to run our business.

Here are some examples of the data we collect. However, this may not be a complete list:

Personal Information: Personal identifying information such as your name, billing and/or shipping address, telephone numbers, email addresses, and other demographic information, such as your age and gender.

Financial Information: Financial information (such as credit card or bank account numbers) in connection with any transaction you make on our Site. Note that we store limited financial data, as most financial data is transferred to third-party payment processors. Any purchase will be processed by one of the following third-party providers: PayPal. We strongly encourage you to review the privacy policy of the third-party payment processors we use to process payment when you purchase anything from our Site.

User Account Information: In order to purchase or access certain Services, we may require you to create a user account and provide your name and/or email address and create a unique password. For your security, we do not have access or knowledge of your password and it is your sole responsibility to keep the password confidential and not share your account details with any other people, including us.

Computer, Browser and Mobile Information: Computer and connection information such as statistics on your page views, traffic to and from the Site, your unique resource locator ("URL"), advertisement data, your internet protocol ("IP") address, your browsing history, and your Site log information. If you access our Site via your mobile phone, we may collect information about your device, including but not limited to, the model, manufacturer, device identification and your location information.

Social Media Information: We may access personal information from social networking sites and apps, including Information but not limited to, Instagram, Facebook, LinkedIn, YouTube, and Twitter which may include your name, username on any of these platforms, location, email, age, gender, profile picture and

any other public information you have included on any of your social media profiles. If you want to limit this data, you should review their privacy and security settings of each social media site and change your privacy settings.

Sensitive Information

We will not request sensitive information from you at any time. Please do not submit any sensitive data to us, including your social insurance or security number, health data, genetic data, or information related to your ethnic origin, religious beliefs, or criminal history. If you do send us this information, then by doing so you are consenting to our use, storage, and processing of this information in accordance with this Policy.

HOW WE COLLECT YOUR INFORMATION

Information You Voluntarily Provide

We collect information you voluntarily and manually provide when you use our Site, such as when you purchase or access Services or certain content on our Site, sign up for our email list or newsletter, submit a form, send us questions, or interact with us through this Site such as when you provide comments or feedback. Some of the information you manually provide may be personal information, such as your name or email address.

Information from Your Website Browser or Mobile Device

We collect information that is sent to us automatically from your website browser or mobile device, such as your IP address, the name of your operating system, the name and version of your browser, date and time of your visit, page(s) you visit and length of time you spent on each page. The information we receive may depend on your browser or device settings. Information received from your website browser and mobile device typically is not, in and of itself, personally identifiable. However, we may combine it with other information in an attempt to identify you, or we may combine it with information that does identify you.

Tracking Technologies

We collect information when you visit our Site and through our email communications, by using cookies, pixels, website beacons, tags, and other tracking technologies to collect information about your engagement, as well as your browsing and purchasing behaviour. These tracking technologies include:

- **Clickstream Data:** Through Site access logs we collect your URL, clickstream data and HTTP protocol elements, which generate certain kinds of non-identifying Site usage data, such as the number of hits and visits to the Site. This information is used for internal purposes for research and development, user analysis and business decision making, all of which provides better services to our users. The statistics garnered, which contain no personal information and cannot

be used to gather such information, may also be provided to third-parties for data processing and analyzing.

- **Cookies:** Cookies collect data sent to us by your computer about (i) the way you interact with our Site, such as when you use certain features or download attachments; (ii) collect data to assess and improve our marketing and advertising; (iii) allow partners and third-parties to use these tracking technologies to track your use of our Site, including on multiple devices; (iv) collect statistical data such as how long you stay on a certain webpage on our Site and the location from where you access our Site. All of this information helps us to improve the Services, provide content based on the interests of our users and improve the functionality of our Site. Most browsers are set to accept cookies by default. In addition, when you first encounter our Site, you will be asked to “consent to cookies.” If you wish to disable cookies, you may do so through your individual browser options. However, this may affect your ability to use or make purchases from our Site. More detailed information about cookie management with specific website browsers can be found at the browsers’ respective websites.
- **Website Beacons or Pixels.** These are small graphics that help us understand browsing activity and provide a better user experience. Unlike cookies, website beacons and pixels are non-identifiable when you visit a website page.
- **Social Widgets.** These buttons are provided by third-party social media providers that allow you to interact and access certain social media services when you view a page on our Site. These widgets may collect browsing data, which may be sent to the respective third-party social media provider.
- **Third Party Software.** We may use third-party software to post advertisements on our Site to oversee marketing or email campaigns, or manage other business initiatives. This third-party software may use cookies or similar tracking technology. We have no control over these third-parties or their use of cookies.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements on our Site are served by third-parties, including advertisers, ad networks and/or servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Ability to OPT-OUT of Tracking

We also may use the above-mentioned technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). We respect your decision if you want to opt-out of tracking for this website. If you choose to opt-out some features of this Site, or future features of this Site may not work properly. For example, you may not be able to share content from our Site to social media sites etc. If you would like to Opt-Out of tracking or just want more information about how to do that please use these resources.

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

- [Activate DO NOT TRACK on Google Chrome](#)
- [Activate DO NOT TRACK on Safari](#)
- [Activate DO NOT TRACK on IOS Devices](#)

Website Analytics

From time to time, we may use third party analytic tools operated by third-party companies. These analytic tools may also use cookies or other tracking technologies to analyze visitors' use of our Site to determine the popularity of the content, and better understand online activity. We do not transfer personal information to these third party vendors. However, in order to access our Site, you are consenting to the collection and use of your information by these third party analytic companies. We recommend you review their respective privacy policies and contact them directly with any questions or requests to delete your information.

Email Policies

We are committed to keeping your e-mail address confidential. We do not sell, rent, or lease our subscription lists to third parties, and will not disclose your email address to any third parties except as expressly set out in this Privacy Policy. In compliance with Canada's Anti-Spam legislation all e-mails sent from our organization will clearly state who the e-mail is from and provide clear information on how to contact the sender. In addition, all e-mail messages will also contain concise information on how to remove yourself from our mailing list so that you can opt-out of further e-mail communication from us and will contain an "unsubscribe" link at the bottom of each email. If you have any issues unsubscribing from our newsletter, please contact us at marksilverthorn@gmail.com, requesting to unsubscribe from future emails.

HOW WE USE AND DISCLOSE YOUR INFORMATION

Use of Information

We generally store your data and transmit it to a third party for processing. However to the extent we process your data, we do so to serve our own legitimate business interest. Generally, the purpose of collecting your information through our Site is to:

- Provide our Site and its contents to you;
- To provide you with information, products or services that you request from us;
- To carry out our obligations and enforce our rights arising from any contracts between you and us, including for billing and collection;
- Collect statistical data and analyze trends for our use, and for use by third-parties to better understand your needs and interests;
- Improve our Services, marketing and promotional efforts or troubleshoot issues on our Site;
- Contact you with special offers, newsletters, information advertisements of third parties and content we believe will be of interest to you which in some instances may be in exchange for a commission to be paid to us by such third parties (if you opt to take part in such promotions, the third parties will receive your information);
- To allow you to participate in interactive and social features on our Site;
- Improve the content, functionality and usability of this Site and provide a tailored and personalized experience for you when you visit our Site;
- Prevent fraudulent activities and security breaches;
- Resolve disputes and assist law enforcement when necessary or respond to any legal claims or otherwise comply with our legal obligations; and
- For any other purpose with your consent.

We may also use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Disclosure of your Information

We may disclose your personal information that we collect or you provide as described in this Privacy Policy with third parties in certain circumstances. In particular we may share your data with third party processors as needed to serve our legitimate business interests. We will not sell your information to any third-party. We may share your Information with third-parties from time to time in certain situations and in order to carry out the following business operations:

- Administering our Site and various tasks such as payment processing, hosting services, email delivery, communications and customer service;
- Delivery of our Services;
- Administering your account;
- Entering into agreements and communication with you;
- Analyzing data and trends, including partnering with third-party analytic companies;
- Run and manage our ads to produce ads that appear when you visit our Site;
- Protecting the security of our business and Site; including to investigate and remedy any breach of any of our rights or policies, or as needed to obtain and maintain insurance coverage, manage risks, obtain financial or legal advice;

- Promoting and marketing the Site and Services;
- In the event of sale or transfer of our business;
- To comply with any requirements to disclose by law, such as to initiate or respond to any legal action or to protect the rights, property and safety of others. This includes sharing information with other parties to prevent security breaches, fraud or credit risks;
- Any other reason necessary to comply with any legal obligation, to protect your interests, the interests of others or our business;
- With your consent.

We also may disclose aggregated information about our users and information that does not identify any individual in compliance with this Privacy Policy and without restriction.

Retention of Information

We generally retain your information only as long as is reasonably necessary to provide you with the Services, comply with our legal obligations or until you request that we delete your information. Any information we no longer need will be permanently deleted.

International Data

Your information, including Personal Data, may be transferred to and maintained on servers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place.

Processing Your Information

Generally, we do not process or hold your Information but instead we use third-party processors to process your data. In order to carry out our business, it is necessary for us to transmit certain information to third-parties. For instance, when you purchase a Service from our Site, your payment information is transmitted to and collected by a third party payment processor. For a full list of third party applications we use, please contact us at markasilverthorn@gmail.com.

In some instances however, we may process your information internally. When you agree to be bound by our Privacy Policy, you consent to our processing of your information for such purposes to carry out our business interests.

Protection of Your Information

We employ commercially reasonable methods to ensure the security of the information you voluntarily provide to us, as well as that information that is collected automatically. We implement a variety of security measures to maintain the safety of your personal information including using standard security protocols and transmitting information securely via Secure Sockets Layer (SSL) and only use recognized online secure payment systems and reputable third party payment processors and

applications. Since email is not considered secure, please do not send us private information via email. Doing so is completely at your own risk. In order to protect our Site, we use software programs to monitor network traffic to identify unauthorized attempts to upload or change information or hack or otherwise damage our Site. While we take these steps to protect your personal information as much as we can, no system or transmission of data over the internet or any other public network or any storage of data can be guaranteed to be 100% secure. If you are concerned about your personal information, please contact us at markasilverthorn@gmail.com.

Event of a Breach

In the unlikely event customer data has been lost, stolen, or potentially compromised, our policy is to alert our customers via email no later than 72 hours of our becoming aware of the event. We will also report such incident to any required data protection authority. We will work closely with any customers affected to determine next steps such as any end-user notifications, needed patches, and how to avoid any similar event in the future.

YOUR RIGHTS

We respect your rights to your personal information and data. You have the right to access, correct, request restriction or deletion of your information, or request how we use your personal information and data collected, as required by applicable law. Note that we may charge a reasonable fee for actions that you ask us to take with respect to your data. In addition, we reserve the right to first request you provide us with evidence verifying your identity before we take any action.

After we verify your identity, you have the right to:

- Update or change any information you have provided to us. To update or delete Your information, please contact us at markasilverthorn@gmail.com;
- Request that we confirm what data we hold about you, and for what purposes. You also have the right to confirmation of whether we process your data or deliver your data to third party processors, and for what purposes. We will supply you with copies of your personal data unless doing so would affect the rights and freedoms of others;
- Change your consent to our use of your information. In such cases, we may require you to delete your account with us, as described above, and you may not have full access to our Site;
- Request a digital copy of the data that we hold about you. Your first request for a copy of your personal data will be provided free of charge; subsequent requests will incur a reasonable fee.
- Request that we gather and transfer your data to another controller, in a commonly used and machine readable format, unless doing so would cause us an undue burden;
- Request that we delete all data that we hold about you, and we must delete such data without undue delay. There are exceptions to this right, such as when keeping your data is required by law, is necessary to exercise the right of freedom of expression and information, is required for compliance with a legal obligation, or is necessary for the exercise or defense of legal claims. Such a request may result in a termination of your account with us and you may have limited or no use of our website;

- Opt out of receiving future email correspondence from us by checking the appropriate box when you register for the account or make a purchase. You may change your communication settings by contacting us at markasilverthorn@gmail.com;
- Opt out of receiving any third party marketing communications or having your personal information used for marketing purposes. You may do this by contacting us at markasilverthorn@gmail.com;
- In certain situations, restrict the processing of your data, such as when you contest the accuracy of your data or when you have objected to processing, pending the verification of that objection. When processing has been restricted, we will continue to store your data but will not pass it on to third party processors without your consent, or as necessary to comply with legal obligations or protect your rights, our rights, or those of others. In addition, you may opt out of any processing of your data altogether. However, doing so may result in the termination of your account and loss of access to our Site; and
- Complain to a supervising authority in your jurisdiction if you believe we are misusing your data or have violated any of your rights under this Privacy Policy or applicable law.

If you wish to have any third-parties, including those to whom we've transmitted your information, delete your information, you will need to contact those third-parties directly to do so. Upon request, we will provide a list of all third parties to whom we have transmitted your information.

Complaints

If you are an EU resident, you have certain rights afforded to you by way of the General Data Protection Regulation, including the right to complain to a supervising authority if you believe we are misusing your information or have violated any of your rights under this Privacy Policy or applicable law. You may do so in the EU member state in which you reside or have your place of business or in which the alleged infringement took place. If you are located outside the EU, you may have rights under privacy laws in the jurisdiction where you live.

California Privacy Rights

The State of California has established its own unique regulations that apply to California residents. If You reside in California, you have the right to obtain from us, once per year and free of charge, information regarding what information we disclose to third party marketers, and the names and addresses of each third party to whom we disclose Your data. As a Californian resident you also have the right that we request not to sell your data.

If You are a California resident and under the age of 18, you have the right to request that we remove any data that You publicly post on our website. To request removal of Your data, please use the contact information listed below. Note that while we will remove your data that is publicly posted on our Site, we may not be able to completely remove that data from our systems.

If You are a California resident and would like to make any of the above requests, please contact us at markasilverthorn@gmail.com. If you make a request, we have 30 days to respond to you.

Changes to our Privacy Policy

We reserve the right to update and change this Privacy Policy and will make our best effort to update the date “Last Updated” at the top of this page each time we make changes. You can review our most recent changes by visiting this page. By continuing to use our Site, you waive specific notice of, and accept all changes to our Privacy Policy made from time to time. We encourage you to return to this page each time you access our Site to ensure you have read our most recent Policy.

Contact us

If you have any questions about our Privacy Policy or wish to exercise any of your rights as set out in this Privacy Policy, please contact our dedicated data manager at markasilverthorn@gmail.com.