## Privacy Policy

## 1. GENERAL

School Finder Limited (""SchoolFinder Group", "SchoolFinder", "SFG", "we", "our", "us" and "SchoolFinder website") and its brands, including SchoolFinderGroup.com, SchoolFinder.com, ScholarshipsCanada.com, StudyinCanada.com, and CCUF.ca, understands the importance of protecting the privacy of the personal information of individuals and the importance of security of confidential information of all types. We have created this Privacy Policy (the "Policy") to demonstrate our commitment to protecting your privacy. This Policy explains:

- what personal information we collect;
- how we use your personal information;
- who we share your personal information with; and
- the choices you have to access, update, and remove your personal information from the services.

During the course of our various activities, we may gather and use personal information through our website, mobile site, applications, tools, and other content and services that are linked to our Terms of Use (collectively, the "**Services**"). This information may be obtained directly from you or collected from third parties to which you have provided consent to disclose this information with us. Our Policy regarding how personal information entrusted to us is collected, used, disclosed, or retained reflects the principles set forth in Canada's *Personal Information Protection and Electronic Documents Act*. Accordingly, personal information is defined as information about an identifiable individual.

Please note that SFG reserves the right to update or change this Policy at any time. We will notify you of any changes by posting an updated Policy on the SchoolFinder website. The most current version of this Policy will govern SFG's use of your personal information. It is your responsibility to check for updates. By continuing to access the SchoolFinder website after changes are made to this Policy, you agree to be bound by the revised terms.

## 2. CONSENT FOR PERSONAL INFORMATION

By providing SFG with your personal information through the SchoolFinder website or any of our forms, you consent to the collection, use, and disclosure of such information in accordance with this Policy and/or for the purposes identified to you at the time you provided the personal information.

You have the opportunity to withdraw your consent, or to opt-out at any time. If you wish to withdraw your consent or to opt-out, including to remove yourself from our email/mailing list, please visit the "Dashboard" section on your profile page or contact us directly using the contact information provided in Section 14.

## 3. INFORMATION WE COLLECT

SFG collects and processes personal information in accordance with this Policy. We will not sell, share, or rent this information to others, except as accounted for in this Policy.

Personal information submitted to SFG, including through the SchoolFinder website, mobile applications or a prescribed form, is kept confidential unless disclosed in accordance with this Policy or any legal requirements. In any event, any personal information provided on the SchoolFinder website by a user is voluntary: any personal information provided by a user is submitted at their discretion. Please note that revoking your consent may result in not being able to access or utilize certain SchoolFinder website features.

SFG reserves the right to contact any user at any time to respond to questions or provide important notifications about our programs or our policies.

There are four different ways in which we collect your information:

- 3.1. Cookies and Tracking. Through cookies (What are cookies?) and tracking, we can track information, including but not limited to (a) how many users visit each part of our site; (b) what features are used; (c) how many of our users are using a certain screen resolution; and (d) what kind of browser they are using.
- 3.2. Registration Information. When you register for an account, you will be asked to provide certain information, including but not limited to your name, email address, username, password, address, and phone number.
- 3.3. Advanced Searches and Tools. We may gather information through our various advanced searches and tools, such as an advanced school search, the advanced scholarship search, the Career Quiz<sup>™</sup>, and other quizzes on the SchoolFinder website.
- 3.4. Analytics.
  - A. SFG uses Google Analytics to track website activity and measure usage patterns on our website. This includes the use of Google Analytics <u>User ID</u> to track registrants' website activities, such as page views and device types used when accessing the website. This information is de-identified (de-identification is the process of removing personal information from a data set), and transmitted to Google's servers. De-identified information may be stored by Google in their data centres, a list of which is available <u>here</u>. Any information that is transferred to Google will be given an arbitrary identification code that can only be associated with a registrant's personal information within SFG's systems, which helps to ensure that the transferred information cannot be used to identify our users while outside our systems.
  - B. SFG uses Hotjar to better understand our users' needs by allowing us to track website activity and usage on our website. This includes collecting information on what type of device is being used to access the website, language preferences, and the countries that users are based in. This information is stored by Hotjar on a pseudonymized user profile. To learn more about Hotjar, including their storage locations, please visit their website <u>here</u>.
  - C. In addition to the above identified tools, SFG may also use other tools from time to time. However, such collection would be limited to the type of information that is already collected by the above Analytics tools and subject to de-identification processes in compliance with this Policy.

## 4. HOW WE USE YOUR INFORMATION

We use the information we collect to perform the follow functions:

- 4.1. Cookies and Tracking. We use information collected through cookies to modify our website and improve our Services to better serve users' interests.
- 4.2. Registration Information. We use registration information in the following ways:
  - A. If you have opted in to receiving email messages, text messages, and/or push notifications from us, then we can send information that will help you to better match with schools, scholarships, and careers. For example, if you live in Nova Scotia and show an interest in art, we may send you open house notices for art schools in Halifax, which provides you with more insight on these nearby opportunities. If you have consented to allow us to contact you with information from our partners, then we may send you information from partners of interest to you.
  - B. Information, like what school you are going to attend or are attending, helps us to modify our website and improve our Services to better serve registrants' interests.
  - C. To help us to market to our partners by providing them with statistics relating to the programs they offer. Information, like the percentage of people registered on our websites that are interested in studying nursing, is important to them when they are deciding whether to advertise with us.
- 4.3. Advanced Searches and Tools. Currently, we keep track of how many people have used these services and we can generate statistics from this information, as demonstrated in Section 5.3. We may, in the future, contact you, if you have given us consent to do so, regarding the results of those searches and quizzes.
- 4.4. Analytics. We may retrieve information gathered through our Analytics services and use it in combination with personal information provided by registrants during the registration process to do any of the following:
  - A. To modify our website and help us improve our Services, such as redesigning the flow of the SchoolFinder website based on usage patterns.
  - B. To tailor our website to display content that is geared to registrants' interests. For example, if a registrant likes to view articles about engineering programs, then we can adjust the website to display more of this content.
  - C. If a registrant has opted in to receiving email messages from us, then we can send information based on their interests and activity on our website. We can also send marketing information that is applicable to them on behalf of our partners and their services.

# 5. DISCLOSING YOUR INFORMATION

Personal information provided by SchoolFinder website users will not be sold, shared, or rented to outside organizations unless in accordance with this Policy. We may disclose your information in the following ways:

- 5.1. When necessary, we will share information about you with our service providers to deliver our services to you. For example, we may share your information with Google to acquire analytics data that will assist in understanding our users' interest and making improvements to the SchoolFinder website. Any disclosed information will go through a de-identification process to better safeguard this data when it is with the service provider.
- 5.2. We will share information about you with our educational partners for the purpose of providing aggregated, de-identified information on student interest and intention. This information will

be used to help our partners determine whether they wish to advertise with us and what content they wish to include within their advertisements on the SchoolFinder website.

- 5.3. Information collected through our Advanced Searches and Tools may be shared on our website and other online platforms in aggregate, de-identified form. For example, we may create a posting that states the top five (5) most searched careers on our website.
- 5.4. If you have submitted information through the LeadMatch<sup>™</sup> and/or Request Information form, we will share the information you provide with the partner(s) you have indicated an interest in.
- 5.5. We will share information about you as required by law.

## 6. YOUR RIGHTS AND ACCESS

You have the right to access personal information that SFG processes about you. At any time, you can access and update this information through the "Dashboard" section on your profile page "My Profile" section of "Dashboard". You can also request from us information about:

- the personal information we hold about you;
- the categories of personal information concerned;
- the purposes of the processing;
- details to whom your personal information has been/will be disclosed;
- how long we retain your personal information;
- if we did not collect the information directly from you, information about the source; and
- how to lodge a complaint with the correct supervisory authority.

You may also request from us the following:

- that we update any incomplete or inaccurate information about you; and
- that we delete your personal information in accordance with applicable laws.

Any requests may be made by contacting us with the information set out in Section 14 below.

## 7. COMMUNICATION WITH SFG

If, during the registration process, you agree to being part of our student community, we may send you email messages, which may include the SchoolFinder or StudyinCanada Newsletter, messages from our partners and our own user surveys and announcements. We may track who opens or replies to these messages. If you change your mind about communicating with us through email, you may do so by logging in and managing your communication preferences within the "Dashboard" section on your profile page.

PLEASE NOTE: If one of our partners wants to send a message to the people registered in our database who have opted in to the student community, then we may send that message on their behalf. We never share your personal information directly with the partners, unless you have opted into this process or requested information directly from them. The only information the partner might receive would be statistics built from our database (for example, the number of students who live in Nova Scotia who are interested in journalism).

## 8. LEADMATCH<sup>™</sup> AND REQUEST INFORMATION FORM

The information that you supply in the LeadMatch<sup>™</sup> and Request Information form will be forwarded to the schools that you have indicated an interest in.

The schools may choose to import this information into their own independent databases in order to keep in contact with you beyond your initial inquiry. This might include open house notices, application opportunities and other kinds of communication sent by mail or email.

If you have supplied a telephone number, the schools may contact you by telephone.

Please be aware that the information provided through LeadMatch<sup>™</sup> is intended for use by the schools. This information, including its use and disclosure, is governed by the recipient school outside of this Policy. SFG is not responsible for the privacy practices of the school or schools you provide your information to through LeadMatch<sup>™</sup>.

## 9. WHAT ARE COOKIES AND HOW DO WE USE THEM?

The SchoolFinder website and Services use cookies to collect and store certain information in accordance with this Policy. A 'cookie' is a small text file sent from a website and stored on the user's computer by the user's web browser. Upon visiting a site that uses cookies, a cookie is downloaded onto your computer or mobile device. The next time you visit that site, your device will remember useful information such as preferences, visited pages, or logging in options.

Cookies are widely used to add functionality to websites, or to ensure they work more efficiently for users. When registering for and using our website, we and/or advertisers on our website will send cookies to your computer. The information stored in our cookies is used to provide you with customized information. If you have used a part of our website or a function of our website, we can keep track of that and use it to help change website content or certain aspects of the website framework.

Most web browsers allow some control to restrict or block cookies through the browser settings; however, if you disable cookies you may find this affects your ability to use certain parts of our website or Services. For more information about cookies please visit <u>https://www.aboutcookies.org</u>.

#### **10. LINKS TO OTHER SITES**

The SchoolFinder website and mobile applications may contain links to other sites. Please be aware that SFG is not responsible for the privacy practices of other sites. We encourage SchoolFinder website visitors to be aware that when they visit another website or use another mobile application site, they should thoroughly read the privacy statements of each and every site, tool or application that collects personally identifiable information.

This Policy applies solely to information collected or processed by us on the SchoolFinder website.

### **11. SECURITY**

SFG employs reasonable industry safeguards that are intended to protect our systems against unauthorized use and access to personal information. Notwithstanding these measures, no collection, storage or transmission of information over the Internet on websites or otherwise can be guaranteed to be 100% secure, and therefore we cannot ensure, warrant or guarantee the security of any such personal information.

Mail, voice communications, faxes, and data transmissions over the Internet are all susceptible to possible loss, misrouting, interception, and misuse of the information being communicated or transmitted. You can prevent unauthorized access to your account and personal information by selecting and securing your access password properly and limiting access to your computer, device, and browser. You should always log out after accessing your account.

Our servers, on which your personal information resides, are located in Canada and follow industry standards pertaining to security. We may use third party services and providers that may keep your information stored in accordance with their policies.

#### 12. BREACH

SFG acts in compliance with all applicable privacy laws. SFG shall comply with, and provide users with, reasonable assistance in complying with, applicable laws with respect to any unauthorized use, access, or disclosure of personal information.

### **13. RETENTION**

SFG only retains personal information for as long as it is necessary for the purposes for which it was collected. When personal information is no longer required for these purposes, it is securely destroyed or deleted. For further details on our data retention periods, please contact us.

Where registrants have consented for us to use their details for marketing, we will keep this data until they notify us or otherwise withdraw your consent.

# 14. ACCESS, QUESTIONS, AND CONCERNS

You can contact us below if you have a question or a complaint about our privacy policy or privacy and how it relates to our websites in general.

School Finder Group 67 Mowat Ave., Suite 402 Toronto, Ontario M6K 3E3 Canada Email: <u>info@SchoolFinder.com</u>