

## **Privacy policy**

This privacy policy ("Policy") describes how the personally identifiable information ("Personal Information") you may provide on the First Class Conferencing Facilitation Inc. ("Company") and any of its related products and services (collectively, "Services") is collected, protected and used. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update this information. This Policy is a legally binding agreement between you ("User", "you" or "your") and this Company ("we", "us" or "our"). By accessing and using the Website and Services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Agreement. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

### **Collection of personal information**

We collect only the necessary information for creating your client accounts, and bill services used. The information collected includes:

Personal details such as name, country of residence, etc.  
Contact information such as email address, address, etc.

### **Use and processing of collected information**

In order to make all Services available to you, or to meet a legal obligation, we need to collect and use certain Personal Information. If you do not provide the information that we request, we may not be able to provide you with the requested products or services. Any of the information we collect from you may be used for the following purposes:

Create and manage user accounts  
Send administrative information  
Respond to inquiries and offer support  
Enforce terms and conditions and policies  
Protect from abuse and malicious users

Respond to legal requests and prevent harm

### **Disclosure of information**

Depending on the requested Services or as necessary to complete any transaction or provide any service you have requested, we may share your information with your consent with our trusted third parties that work with us, any other affiliates and subsidiaries we rely upon to assist in the operation of the Services available to you. We do not share Personal Information with unaffiliated third parties. These service providers are not authorized to use or disclose your information except as necessary to perform services on our behalf or comply with legal requirements. We may share your Personal Information for these purposes only with third parties whose privacy policies are consistent with ours or who agree to abide by our policies with respect to Personal Information. These third parties are given Personal Information they need only in order to perform their designated functions, and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes.

### **Retention of information**

We will retain and use your Personal Information for the period necessary to comply with our legal obligations, resolve disputes, and enforce our agreements unless a longer retention period is required or permitted by law. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after the expiration of the retention period.

### **The rights of users**

You may exercise certain rights regarding your information processed by us. In particular, you have the right to do the following: (i) you have

the right to withdraw consent where you have previously given your consent to the processing of your information; (ii) you have the right to object to the processing of your information if the processing is carried out on a legal basis other than consent; (iii) you have the right to learn if information is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the information undergoing processing; (iv) you have the right to verify the accuracy of your information and ask for it to be updated or corrected; (v) you have the right, under certain circumstances, to restrict the processing of your information, in which case, we will not process your information for any purpose other than storing it; (vi) you have the right, under certain circumstances, to obtain the erasure of your Personal Information from us; (vii) you have the right to receive your information in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that your information is processed by automated means and that the processing is based on your consent, on a contract which you are part of or on pre-contractual obligations thereof.

### **The right to object to processing**

Where Personal Information is processed for the public interest, in the exercise of an official authority vested in us or for the purposes of the legitimate interests pursued by us, you may object to such processing by providing a ground related to your particular situation to justify the objection.

### **Data protection rights under GDPR**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights and the Operator aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Information. If you wish to be informed what Personal Information we hold about you and if you want it to be removed from our systems, please contact us. In certain circumstances, you have the following data protection rights:

You have the right to request access to your Personal Information that we store and have the ability to access your Personal Information.

You have the right to request that we correct any Personal Information you believe is inaccurate. You also have the right to request us to complete the Personal Information you believe is incomplete.

You have the right to request the erase your Personal Information under certain conditions of this Policy.

You have the right to object to our processing of your Personal Information.

You have the right to seek restrictions on the processing of your Personal Information. When you restrict the processing of your Personal Information, we may store it but will not process it further.

You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

You also have the right to withdraw your consent at any time where the Operator relied on your consent to process your Personal Information.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority in the European Economic Area (EEA).

### **California privacy rights**

In addition to the rights as explained in this Policy, California residents who provide Personal Information (as defined in the statute) to obtain products or services for personal, family, or household use are entitled to request and obtain from us, once a calendar year, information about the Personal Information we shared, if any, with other businesses for marketing uses. If applicable, this information would include the categories of Personal Information and the names and addresses of those businesses with which we shared such personal information for the immediately prior calendar year (e.g., requests made in the current year will receive information about the prior year). To obtain this information please contact us.

### **How to exercise these rights**

Any requests to exercise your rights can be directed to the Operator through the contact details provided in this document. Please note that we may ask you to verify your identity before responding to such requests. Your request must provide sufficient information that allows us to verify that you are the person you are claiming to be or that you are the authorized representative of such person. You must include sufficient details to allow us to properly understand the request and respond to it. We cannot respond to your request or provide you with Personal Information unless we first verify your identity or authority to make such a request and confirm that the Personal Information relates to you.

### **Non-Disclosures Agreement**

All of our workers sign NDA's with you to ensure the highest level of privacy. We also guarantee any and all private documents shared with us are deleted from our systems after the event or meeting, unless requested by you due to recurring events or meetings.

### **Acceptance of this policy**

You acknowledge that you have read this Policy and agree to all its terms and conditions. By accessing and using our Services you agree to be bound by this Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to access or use the Website and Services.

### **Contacting us**

If you would like to contact us to understand more about this Policy or wish to contact us concerning any matter relating to individual rights and your Personal Information, you may do so via the contact form, send an email to [inquiries@firstclassfacilitation.ca](mailto:inquiries@firstclassfacilitation.ca) or write a letter to 25 Grenville Street, Toronto ON