



Al Truistic's Beer Bread Bakery

Gravenhurst, Ontario

info@altruisticsbeerbreadbakery.ca

705-735-7434 833-455-9684

Policy and Procedure

Privacy

Introduction

This policy explains how Al Truistic's Beer Bread Bakery will protect personal information it collects from consumer and commercial clients online and offline.

Policy

Al Truistic's Beer Bread Bakery owner, David Munro, will act as its Privacy Officer. The responsibility of the privacy officer is to respond to inquiries and complaints; establish and maintain directory listings for clients; assist in updating information that is published on the website; understand the legislation; and apply pertinent changes to Al Truistic's Beer Bread Bakery's Privacy Policy. Contact information is: phone: 705-735-7434 or email: info@altruisticsbeerbreadbakery.ca

Purpose of Personal Information Collection

Al Truistic's Beer Bread Bakery collects and uses personal information for the following Identified Purposes:

- To understand and fulfill client needs or requests for Al Truistic's Beer Bread Bakery's products and personalized services;
- To provide services and products for our clients, including transmitting training information, training class schedules or materials.
- To confirm the identity of specific clients (to avoid breaching the privacy of other clients)
- To communicate with clients and site visitors, when necessary, and to inform clients of marketing offers for other products and services available from Al Truistic's Beer Bread Bakery and third parties;
- To bill accounts and maintain payment records; and to collect payment, or unpaid accounts if necessary;
- To comply with any applicable law, regulation, legal process or government request; or to bring legal action if the company is threatened,
- To respond to a legitimate claim, or to address our reasonable belief, that you are violating the rights of any third party or any of the agreements or policies

that govern your use of the AL Truistic's Beer Bread Bakery's site or any product or service;

- To protect the services, products or rights of AL Truistic's Beer Bread Bakery, including but not limited to the security or integrity of AL Truistic's Beer Bread Bakery's site; and
- To identify and resolve technical problems concerning AL Truistic's Beer Bread Bakery's site, products and services.
- To analyze client activity in aggregate form (i.e., not individually attributable to you) to understand visitor and client preferences via cookies or pixels for the website and/or social media, for its business analysis, operational, marketing and other promotional purposes; and to provide general statistics to organizations that track aggregate information regarding entrepreneurs.

When you visit the AL Truistic's Beer Bread Bakery's web site, a cookie may be placed on your computer or the cookie may be read if you have visited the AL Truistic's Beer Bread Bakery's site previously. If you choose to not have your browser accept cookies or pixels from AL Truistic's Beer Bread Bakery's web site, or social media sites, you may not be able to view all the text on the screens, or to experience a personalized visit, or to subscribe to certain service and product offerings on AL Truistic's Beer bread Bakery's site.

Consent for Collection, Use and Disclosure of Information

Your use of AL Truistic's Beer Bread Bakery's site and/or your registration for products and services constitute your consent to the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use AL Truistic's Beer Bread Bakery's site or AL Truistic's Beer Bread Bakery's products and services.

Consent may be withdrawn by advising the Privacy Officer that the client is withdrawing consent (e.g. by unsubscribing from lists, or requesting that information be unpublished).

Limiting the Collection of Personal Information

AL Truistic's Beer Bread Bakery limits its collection of personal information to only that information which is necessary for the Identified Purposes. AL Truistic's Beer Bread Bakery does not direct its site to, nor does it knowingly collect any personal information from children under the age of thirteen.

Types of information Al Truistic's Beer Bread Bakery collects

Al Truistic's Beer Bread Bakery collects information to fulfill the business purposes outlined above, at the time of your registration to purchase or for classes, certain "personal information" (information that personally identifies you) including but not limited to the following:

- Contact information (business and/or home information, including name, email addresses, home and business addresses, phone numbers)
- Financial information, including credit card information to establish recurring payments for Al Truistic's Beer Bread Bakery, for those who choose a subscription option and while payments are due to Al Truistic's Beer Bread Bakery. This information is kept by approval on physical forms during the period that payments are due to Al Truistic's Beer Bread Bakery, and then shredded.
- Age categories
- Business information, e.g. business purpose and marketing information in conjunction with business coaching activities.
- For general visitors to the Al Truistic's Beer Bread Bakery site or social media, computer hardware or software information through cookies or pixels (e.g., IP address, operating system, browser type, domain name, URL, access times, and referring web site addresses)
- Information may be made available to the following third parties, all of which have privacy policies in place. They include:
 - The Al Truistic's Beer Bread Bakery accountant and bookkeeper (financial information for the purposes of tax planning and reimbursement)
 - QuickBooks software and Square Systems (online)
 - Collection agencies (in the case of delinquent accounts)
 - Email Marketing services (Square and Setmore)
 - Web firms which support the Al Truistic's Beer Bread Bakery website or which perform digital marketing activities and Square (sales platform) and Setmore (Class scheduling platform)
 - Virtual Assistants (from time to time to monitor announcements, send referral letters, past due collections, and miscellaneous administrative activities)
 - 3rd party backup software to ensure the security of Al Truistic's Beer Bread Bakery data and files (Apple Time Machine on physical drive looking into cloud)

Limiting use, Disclosure and Retention

Clients and non-clients who sign-on to receive email communications (without necessarily becoming clients of Al Truistic's Beer Bread Bakery), provide their

name and email address. This information will be stored on our Marketing account and the Al Truistic's Beer Bread Bakery website.

How will this information be processed and stored?

Your information may be stored and processed in the Canada or the United States, or in any other country in which Al Truistic's Beer Bread Bakery or its affiliates, subsidiaries, suppliers or agents maintain facilities. By using this web site, you consent to any such possible transfer of information outside of your country.

Electronic files and information is primarily managed internally and is stored on computers belonging to Al Truistic's Beer Bread Bakery employees or contractors.

When consent is obtained from each client, their email is added to our email list, a membership profile is added for each client and a web profile is established on the Al Truistic's Beer Bread Bakery website.

- Training notes and communications regarding the classes are sent by the email address provided to Al Truistic's Beer Bread Bakery. The information is also used to understand client demographics and from time to time, to provide non-specific statistical information to organizations who track entrepreneurial statistics
- If Al Truistic's Beer Bread Bakery hires other companies to provide some products or services on our behalf, we will only provide those companies or individuals the personal information they need for the Identified Purposes within their scope of work, and we will limit their rights to use and further disclose your personal information as appropriate in the course of their work for us
- Information that Al Truistic's Beer Bread Bakery gathers is retained in web-based software associated with the Al Truistic's Beer Bread Bakery website, in an (email) account for email services, in a Square account that manages online sales, QuickBooks software to manage finances, Setmore scheduling software and in an excel-based database or reports
- Financial data is stored on a main stand-alone server owned by Al Truistic's Beer Bread Bakery, which is not connected to the Internet and which is backed up each time it is accessed, to a USB key and a second back up to an external hard drive (also not attached to the Internet). Information is also stored on password protected computers owned by individuals who are participants in the company or are contracted to the company, to provide support. Hard copies of reports may be retained in a locked filing cabinet in the Al Truistic's Beer Bread Bakery office on the Al Truistic's Beer Bread

Bakery Google business account (in Google docs). Backups of Al Truistic's Beer Bread Bakery computers are made on a continuous basis to a physical hard disk.

Will this information be disclosed?

Al Truistic's Beer Bread Bakery does not sell or rent your personal information to anyone. Al Truistic's Beer Bread Bakery does not disclose your personal information to anyone who falls outside the umbrella of the Identified purposes, except in limited situations (e.g. in accordance with subsection 8 (2) of the Privacy Act), for example in the following cases:

- To someone you have designated to act as your agent, for one or more of the Identified Purposes (listed above)
- To Al Truistic's Beer Bread Bakery employees, independent contractors, subsidiaries, affiliates, consultants, business associates, service providers, suppliers and agents, who provide services to Al Truistic's Beer Bread Bakery
- Someone our clients have designated to act as their agent, for one or more of the Identified Purposes
- If Al Truistic's Beer Bread Bakery has reason to believe that disclosure is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference (either intentionally or unintentionally) with Al Truistic's Beer Bread Bakery's rights or property, other users of the Al Truistic's Beer Bread Bakery web site, products or services, or anyone else that could be harmed by such activities, and
- To respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law
- In addition, as Al Truistic's Beer Bread Bakery continues to develop its business, we or our affiliates or partners may sell or buy other businesses or entities, or we may merge with another company. In such transactions, personal information may be one of the transferred business assets.

How long will the information be retained?

Al Truistic's Beer Bread Bakery's client information will be used in relation to the identified purposes below. After your account becomes inactive (that is, if you request to be removed from our database), Al Truistic's Beer Bread Bakery will keep your personal information in its private archives. Your information will then be used only as necessary for tax reasons or to prove that Al Truistic's Beer Bread Bakery is compliant with any applicable law.

- When a member has unsubscribed from the Al Truistic's Beer Bread Bakery email list, their email address is maintained in our 3rd party database under

the unsubscribed category (and in our website database as an unsubscribed email address) to ensure adherence to legal statutes

- Products or services may be removed from a client as a result of an account that is not in good standing (and until payment is made and according to CRA guidelines)
- Financial records are retained according to CRA guidelines
- Client credit card information is maintained until outstanding payments to Al Truistic's Beer Bread Bakery are completed, resulting in a zero account balance
 - Once accounts have achieved a zero balance, credit card information is shredded.
- Al Truistic's Beer Bread Bakery account records are maintained to satisfy CRA requirements, and then will be shredded
- Al Truistic's Beer Bread Bakery databases will be archived and stored in a secure location

Ensure the Accuracy of Personal Information

The Chief Privacy Officer is responsible to ensure the information collected is as accurate as can be at the time of collection. Al Truistic's Beer Bread Bakery ensures the accuracy of personal information by asking their clients to fill in and complete their own information and registration forms. Al Truistic's Beer Bread Bakery will use reasonable efforts to keep client personal information accurate for the Identified Purposes, and to minimize the possibility of making inappropriate client decisions based on such information.

Clients are responsible for informing Al Truistic's Beer Bread Bakery about changes to their personal information. They can do this by sending an email to info@altruisticsbeerbreadbakery.ca or using the contact form on Al Truistic's Beer Bread Bakery website. Al Truistic's Beer Bread Bakery will use new or updated personal information it receives from clients to update its own records.

How will the information be safeguarded?

Electronic databases, servers and individual computers are password protected. All computer hardware has firewall and virus protection in place and data is backed up using Apple Time Machine software which is password-protected, and which has the same safeguards in place.

The filing cabinet housing personal information in the Al Truistic's Beer Bread Bakery office is locked when not in use. Access is only granted on a need-to-know

basis to those individuals who are under contract to Al Truistic's Beer Bread Bakery to provide specific services. No unauthorized parties are able to access this information.

Openness and Individual Access

Requests or access, updating or withdrawal of information Al Truistic's Beer Bread Bakery will afford clients and vendors a reasonable opportunity to review the personal information in their file. Please direct any requests for access to your information in writing to David Munro, info@altruisticsbeerbreadbakery.ca or mail at 100 Muskoka Rd. S, Unit C, PO Box 1421, Gravenhurst, ON P1P 1V5

- Please allow at least 14 days for a response to your request particularly if your question is sent by mail
- Your information will be provided to you as quickly as possible (but no later than 30 days from the date of your request), as long as that information may be legally copied to the person making the inquiry
- If Al Truistic's Beer Bread Bakery is not able to provide access to some aspect of a client's personal information, it will provide reasons for denying access such as (see legal restrictions and examples below):
 - That the information relates to a breach of an agreement or a contravention of law
 - Its disclosure could reasonably be expected to threaten the life or security of another individual

In terms of mandatory exceptions, organizations must refuse an individual access to personal information:

- If it would reveal personal information about another individual unless there is consent or a life-threatening situation. This is unlikely since records are usually individual but could be required in the event of involvement in a law suit; or
- If an individual requests that he or she be informed of information disclosed to a government institution in certain specified cases, or for access to the information itself, and the government institution objects to the institution complying with the access request. In such cases, Al Truistic's Beer Bread Bakery must refuse the request and notify the Privacy Commissioner of Canada. As well, Al Truistic's Beer Bread Bakery cannot inform the individual of the disclosure to the government institution, that the institution was notified of the request, or that the Privacy Commissioner of Canada was notified of the refusal.

In terms of discretionary exceptions, Al Truistic's Beer Bread Bakery may refuse access to personal information if the information:

- Is protected by solicitor-client privilege
- Would reveal confidential commercial information, although if this information can be redacted, Al Truistic's Beer Bread Bakery will release the remaining information
- Would reasonably be expected to harm an individual's life or security; although if this information can be redacted, Al Truistic's Beer Bread Bakery will release the remaining information
- Was collected without the individual's knowledge or consent to ensure its availability and accuracy, and the collection was required to investigate a breach of an agreement or violation of a federal or provincial law (the Privacy Commissioner of Canada must be notified)
- Was generated in the course of a formal dispute resolution process, or
- Was created for the purpose of making a disclosure under the Public Servants Disclosure Protection Act or a related investigation.

Challenging Compliance: Recourse

Complaints about the organization

- Please direct any complaints about the Al Truistic's Beer Bread Bakery in writing to: David Munro, info@altruisticsbeerbreadbakery.ca
- Please allow 14 days for a response to your request.
- To find resolution to a complaint, first approach the Al Truistic's Beer Bread Bakery privacy officer. Should that prove unsatisfactory, individuals can contact the Privacy Commissioner of Canada:

Daniel Therrien, 112 Kent St., Ottawa, ON K1A 1H3.

1-800-282-1376

1-613-947-6850 Fax

www.privcom.gc.ca

Clients have the right to request that information is removed that is no longer accurate or complete and information be amended as appropriate, by contacting David Munro as described above, who will promptly correct such personal information.

Any challenges an individual wishes to make to the organization's compliance with the above principles in this policy should be addressed to David Munro, the Chief Privacy Officer at the above contacts, in writing.