

Privacy Policy

Effective March 10, 2020

[What is personal information?](#)

[What information do we collect and for what purpose?](#)

[How and from which sources do we collect your personal information?](#)

[To whom do we disclose your personal information?](#)

[Where do we store your personal information?](#)

[Your legal rights to your personal information](#)

[Do we use cookies and other similar technologies?](#)

[Do we collect the personal information of children?](#)

[How long do we retain your personal information?](#)

[How do we protect your personal information?](#)

[Updates to this Privacy Policy](#)

[How do I report a privacy concern?](#)

This Privacy Policy explains how Private AI collects, uses, stores, discloses and otherwise manages your personal information, including in connection with our website www.private-ai.ca, also reachable by www.priv-ai.com and by www.privateai.ca (“**Website**”). Please review the following carefully so that you understand our privacy practices. Where the words “**we**”, “**us**”, or “**our**” is used, it is referring to Private AI.

In addition to this policy, we may also provide you with additional information through prompts, on-line notices and our website [Terms of Use](#). We might also provide you with any product or service specific privacy notices at the time of your specific interaction or purchase.

Our Website may contain links to other sites that we do not own or operate. We will not give any of your personal information to these third parties without your consent, unless stated otherwise in this Privacy Policy. We provide links to third-party sites and services for your reference. We do not endorse these sites or services.

The linked websites have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

For a PDF version of our Terms of Use, please [click here](#).

WHAT IS PERSONAL INFORMATION?

Personal information is information that does or can be used to identify you, either on its own (e.g. your name) or when combined with other information. Personal information can include, but is not limited to:

- First name, last name
- Address or postal code
- E-mail address
- IP address or Device ID
- Opinions, evaluations, comments, reviews of products and services

WHAT INFORMATION DO WE COLLECT AND FOR WHAT PURPOSE?

We collect personal information for the purposes of providing you our products and services, verifying your identity, tailoring your online experience and establishing and maintaining responsible commercial relations with you and complying with regulatory and legal requirements.

The table below provides an easy to use reference guide to the personal information we collect about you and our reasons for doing so.

Personal information we may collect:	Purposes for collecting your personal information include:
First and last name	<ul style="list-style-type: none"> • create and maintain your account
Billing information	<ul style="list-style-type: none"> • process a purchase
E-mail address	<ul style="list-style-type: none"> • create and maintain your account • receive notifications and confirmations • receive subscribed marketing materials • receive electronic receipts/invoices • validate your account and communicate with you
Last four digits of your credit card	<ul style="list-style-type: none"> • fraud detection • address payment processing issues with our payment processing service provider
Technical <ul style="list-style-type: none"> • IP address • Device ID • Operating system • Type of browser 	<ul style="list-style-type: none"> • collect statistical information on the number of product downloads • collect information about the devices that have downloaded our licensed software and the registered accounts to which it is linked • improve our Website and services, we may collect information about how you interact with our Website,

<ul style="list-style-type: none"> • Browsing behaviour • Other device specifications such as memory availability 	<p>viewed pages, access dates and times, IP address and the internet browser you use</p>
<p>Marketing consents and preferences</p>	<ul style="list-style-type: none"> • meet our legal obligations • send you marketing and promotional materials that you have agreed or requested to receive

If you apply for a position with us, we will also collect any information you provide us in your curriculum vitae and throughout the recruitment process. The purpose of collecting and storing this information is to consider and make a determination on your application.

HOW AND FROM WHICH SOURCES DO WE COLLECT YOUR PERSONAL INFORMATION?

Most of the personal information we collect about you is provided from you directly. The following table provides a summary of how we collect your personal information.

From whom?	How is your personal information collected?
<p>You</p>	<ul style="list-style-type: none"> • When you enter your information in our system to create an account, subscribe to a newsletter or through other direct interactions
<p>Third parties</p>	<ul style="list-style-type: none"> • From cookies and other similar technologies such as Sendinblue analytics • From browser extensions and features that notify us when our product has been installed or uninstalled by you.

TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?

We are so serious about privacy we put it in our name! We do not sell or rent your personal information. We are serious about safeguarding your personal information, including maintaining controls for employee and third-party access to your personal information. Below are some examples:

Service providers

In providing our services to you, we may rely on third party service providers to help perform administrative functions, assist with service delivery or troubleshooting, process payments or assist us in analyzing how our services are being used, among other things. To perform these functions, we may need to share your personal information with our service providers. Our service providers are contractually bound to protect your personal information and to use it only for the purposes for which we have instructed.

Some of these third-party service providers may be located outside of Canada, including the United States, Germany or elsewhere in the European Union. As a result, your personal information may be accessible to law enforcement, courts and regulatory authorities in accordance with the laws of these jurisdictions.

Legal transaction

In the event of a sell, assignment, or other transfer of all or a portion of our business or assets, information we might have about you might be transferred or disclosed to a purchaser or prospective purchaser. Should such a transfer occur, we will use reasonable efforts to try to ensure that the transferee uses your information in a manner that is consistent with this policy unless otherwise permitted or required by applicable law.

Other legal requirement

We may be compelled to share your information with a court of law or other person(s) or entity / entities with jurisdiction to compel production of such information.

WHERE DO WE STORE YOUR PERSONAL INFORMATION?

We store personal information that we collect from you or about you on Google and Amazon Web Services Cloud Platform servers in Canada.

As noted, from time to time your personal information may be transferred to third party hosts outside of Canada to facilitate or provide certain services on our behalf. These third parties have access to your personal information only to perform the tasks we have instructed them to complete and are contractually bound not to disclose or use it for any other purpose.

Where personal information is transferred to and stored in a country not determined by the European Commission as providing adequate levels of protection for personal information, we take steps to provide appropriate safeguards to protect your personal information, including:

- entering into standard contractual clauses approved by the European Commission, obliging recipients to protect your personal information as permitted under Article

46(2)(c) of the GDPR;

- under the EU-U.S. Privacy Shield Framework (where we transfer personal information to the U.S.), which enables U.S. businesses to self-certify as a means of complying with EU data protection laws.

In the absence of an adequacy decision or of appropriate safeguards as referenced above, we will only transfer personal data to a location outside the EEA where one of the following applies (as permitted under Article 49 of the GDPR):

- the transfer is necessary for the performance of our contractual engagement with you;
- the transfer is necessary for the establishment, exercise or defense of legal claims; or
- you have provided explicit consent to the transfer.

For additional information about the way in which our service providers handle your personal information, contact us at info@private-ai.ca.

By using our Website, you consent to the transfer of your personal information outside of your jurisdiction for the purpose of storing your personal information or processing it.

YOUR LEGAL RIGHTS TO YOUR PERSONAL INFORMATION

Depending on your jurisdiction, you may have the following rights to your personal information:

Right	Description
Right to know	<p>You have the right to request the categories and specific pieces of personal information we collect including:</p> <ol style="list-style-type: none"> 1) categories of personal information collected; 2) categories of sources from which personal information is collected; 3) business or commercial purposes for collecting your personal information; 4) categories of third parties with whom we share personal information; and <p>specific pieces of personal information we have collected about you.</p>
Right to request access to your personal information	<p>You have a right to request a copy of the personal information that we hold about you. To do so, please contact us at info@private-ai.ca.</p>

<p>Right to request the erasure of your personal information</p>	<p>You have the right to request that we delete or remove personal information where there is no good reason for us continuing to process it.</p> <p>Erasure requests are subject to certain limitations, for example, we may retain personal information as permitted by law.</p>
<p>Right to request we transfer your personal information to you</p>	<p>Subject to certain limitations you have the right to request that the personal information we hold about you is transferred to you or to a third party. We will provide you, or the third party you have chosen, your personal information in a machine-readable format.</p>
<p>Right to request correction of your personal information</p>	<p>You have the right to request that we correct the personal information we hold about you, although we may need to verify the accuracy of the new information you provide us. We may refuse to comply with a request for rectification if the request is manifestly unfounded, excessive or repetitive in nature</p>
<p>Right to request restrictions on the processing of your personal information</p>	<p>You have the right to request that we suspend the processing of your personal information in the following scenarios:</p> <ul style="list-style-type: none"> • if you contest the accuracy of the personal information we hold about you and we are verifying the accuracy of that information; • where it has been determined that the processing of your personal information is unlawful but you do not want us to erase it; • where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or • for other legal purposes. <p>We may refuse to comply with a request for restriction if the request is manifestly unfounded, excessive or repetitive in nature.</p>
<p>Right to object to the processing of your personal information</p>	<p>In some circumstances, you have the right to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party). In this case, you must provide specific reasons for why you object to the processing of your personal information.</p>

	You have an absolute right to object to the processing of your personal data for direct marketing purposes.
Right to withdraw consent	<p>In circumstances where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time.</p> <p>The withdrawal of consent will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent</p>
Right to non-discrimination	Exercising your right to privacy does not result in different treatment by us or different quantities or qualities of product or service that we offer. Where we request your personal information in exchange for a valuable product or service, we will let you know at the time of the exchange.

DO WE USE COOKIES OR OTHER SIMILAR TECHNOLOGIES?

Most websites use cookies. A cookie is a small text file which our website may place on your computer as a tool to remember your preferences and display more relevant information next time you visit. You may refuse to use cookies by selecting appropriate settings on your browser, however, please note that if you disable cookies, you may not be able to use the full functions of our service.

In addition, our website uses Sendinblue analytics services to help us understand non-personal facts and figures about users of the website such as:

- website traffic;
- number of visitors;
- location of visitors;
- information about the browser version and device type;
- referral sources to the website;
- demographics of visitors;
- and website usage.

DO WE COLLECT THE PERSONAL INFORMATION OF CHILDREN?

The short answer is “no”. This Website and our Services are not directed, marketed, or meant to be used by persons under the age of eighteen (18). If you think your child might have created an account with us without your consent, you may request the deletion of the account and the data that we have about your child by writing to us at info@private-ai.ca.

HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?

We will generally retain your personal information for as long as is necessary to meet our contractual obligations to you, to satisfy the purposes stated above or as otherwise required by law.

When determining the relevant retention period, we consider:

- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- our legitimate interests where we have carried out balancing tests (see section on 'What Information do we collect and for what purpose' above);
- guidelines issued by relevant data protection authorities; and
- other legal purposes.

In addition to the above, your personal information may be anonymized and used in aggregate. Once it is determined that your personal information is no longer necessary as indicated above, we will securely erase your personal information.

You may also request the deletion of your profile by sending an e-mail to info@private-ai.ca. It may take up to twenty (20) business days to respond to your request.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We take appropriate technical, physical and organizational security measures to protect personal information in our custody and control against unauthorized access, use, modification and disclosure, and accidental loss, destruction and damage.

The third-party vendors with whom we engage for specific tasks are required to have certain safeguards in place that comply with industry standards.

That having been said, we cannot guarantee the security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. Any transmission of information from you to Private AI is at your own risk. Where you have chosen a password that allows you to access our Website you are responsible for keeping this password confidential.

UPDATES TO THIS PRIVACY POLICY

This Privacy Policy and other service specific policies may change from time to time, in accordance with applicable laws. We will notify you of these changes by posting the updated policy on our Website. We may also notify you by sending you an e-mail or by any other reasonable means such as a pop-up notice, if available.

We encourage you to review our Privacy Policy periodically.

HOW DO I REPORT A PRIVACY CONCERN?

We are committed to maintaining high standards for privacy. We want to hear from you about any concerns you may have with our privacy practices. If you wish to raise a concern or compliment us on our privacy practices, you can contact us at info@private-ai.ca.

If we are not able to address your privacy concerns to your level of satisfaction, you may contact the Office of the Privacy Commissioner of Canada:

Office of the Privacy Commissioner of Canada
30, Victoria Street
Gatineau, Quebec
K1A 1H3

Toll-free: 1-800-282-1376

Phone: (819) 994-5444

TTY: (819) 994-6591