

SHABEQUAY HEALING PRIVACY POLICY

www.shabequay.ca (the “**Shabequay Site**”) is operated by Shabequay Healing (“**Shabequay Healing**”, which term includes all of its affiliates, agents, representatives, practitioners, users, contractors, employees, licensors, licensees, suppliers, partners and licensors, including Pamela Vialoux). This page contains the Privacy Policy for the Shabequay Site, as well as for any related subdomains and subsidiary sites (collectively, the “**Sites**”) for the healing services offered by Shabequay Healing (together with the Sites, the “**Service**”).

By using the Service, you consent to the collection, use and disclosure of your personal information by Shabequay Healing in accordance with this Privacy Policy.

1. Definitions.

For the purposes of this Privacy Policy, the following words and variations thereof have the following meanings:

“**collection**” means the act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

“**consent**” means voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the user or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an user's action or inaction.

“**user**” means an individual who uses the Service provided by Shabequay Healing, including anyone who accesses or visits the Sites.

“**disclosure**” means making personal information available to a third party.

“**employee**” means an employee of Shabequay Healing, and for the purpose of this Privacy Policy only, includes independent and other contractors performing services within Shabequay Healing.

“**personal information**” means information about an identifiable individual but not aggregated information that cannot be associated with a specific individual. For a registered user, such information may include (but is not limited to) billing information, account information, billing records, and any recorded complaints.

“**third party**” means an individual other than the user, or the user's agent, or an organization outside Shabequay Healing.

“**use**” means the treatment, handling, and management of personal information by and within Shabequay Healing.

2. Purpose of Collection

Shabequay Healing collects your personal information for the following purposes:

- (a) if you are a registered user, to establish and maintain your Shabequay Healing account and to provide the ongoing services that you request;
- (b) to process purchases made by registered users;

- (c) to process and provide bill statements to registered users (if applicable) and to collect amounts owing to Shabequay Healing;
- (d) to manage and develop the business and operations of Shabequay Healing, including to analyze where our users are located, to determine the systems or devices for which we should optimize our system, to troubleshoot network and system problems, and to identify areas that could use improvement in order to increase users' satisfaction;
- (e) to improve users' experience of the Sites, including to customize website settings;
- (f) to meet legal and regulatory requirements.

3. Collection

Shabequay Healing may collect any or all of the following personal information if the information is reasonably required to provide the services accessed or requested by you:

- (a) information that you provide when you become a registered user or otherwise complete forms on the Sites, such as your name, email and postal address, telephone number, sex, and country of residence, including if you subscribe to our newsletter, upload or submit any material through the Sites, or request any information;
- (b) your log-in and password details in connection with your Shabequay Healing account, including your username;
- (c) information that you provide to Shabequay Healing in order to make purchases, including banking and billing information;
- (d) your correspondence with Shabequay Healing employees, including any questions, concerns or comments you may have about the Service or problems that you report;
- (e) comments that you may post to the Sites;
- (f) details of your transactions and requests made through the Service;
- (g) information collected by our Sites' "cookies" (if enabled and you are logged in) about your user-ID, log-in information, personal preferences and/or settings, e-mail address, IP address, browser and operating system information, areas visited in our Sites, the Uniform Resource Locator (URL) and access date and time. Please note that the purpose of our cookies is to improve efficiency for navigating through the Sites. Our cookies do not track information on the user's local system's storage. Our cookies are non-intrusive and are not used for analytics for targeted marketing; and
- (h) your IP address. Please note that Shabequay Healing only collects IP addresses for the purpose of tracking where the user is coming from, analyzing trends, and for system administration and maintenance. Shabequay Healing does not link IP addresses to personally identifiable information.

4. Use

Shabequay Healing may use your personal information as is reasonably required to:

- (a) verify your identity when you sign into your account;
- (b) verify your banking information if you make a purchase;
- (c) provide you with the services that you have requested;
- (d) administer your Shabequay Healing account;
- (e) respond to questions, comments, requests or complaints that you submit to Shabequay Healing;
- (f) analyze use of the Sites and to improve the Service;
- (g) to provide Service-related announcements to you, if you request them; and
- (h) fulfill a purpose that we disclose to you when we request your personal information.

5. Disclosure

Shabequay Healing may disclose your personal information to:

- (a) a third-party payment processing company;
- (b) an agent used by Shabequay Healing to collect an outstanding account;
- (c) a person who, in the reasonable judgment of Shabequay Healing, is seeking the information as an agent of the user; and
- (d) a third party or parties, where the user consents to such disclosure or disclosure is required by law.

Shabequay Healing does not have control over, and is not responsible for, personal information that users voluntarily disclose about themselves to the public via the Service, nor for personal information that a user may disclose about another user via the Service. Please exercise caution before disclosing personal information about yourself to other users through the public forum or other pages on the Sites.

Shabequay Healing will never disclose your banking information to another user. Shabequay Healing will never disclose your banking information to a third party. Shabequay Healing does not store any credit card information in the Shabequay Healing Site. All financial information is stored directly with the third-party payment processing company, Square Canada.

6. Safeguarding your personal information

Shabequay Healing is committed to safeguarding your personal information. Shabequay Healing uses appropriate security measures to protect personal information against risks such as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction

regardless of the format in which it is held. The methods of protection and safeguards used by Shabequay Healing include, but are not limited to, locked filing cabinets, need-to-know access and technological measures including the use of passwords, encryption and firewalls. While Shabequay Healing cannot guarantee that risks such as loss, theft, unauthorized access or disclosure of personal information will not occur, Shabequay Healing will make every effort to prevent such unfortunate occurrences.

Shabequay Healing does not store financial information such as credit card and banking information on its server. This information is stored with trusted third party payment processing service providers selected by Shabequay Healing, which include major banks and financial institutions and their credit card processing partners. Shabequay Healing also Square Canada. Shabequay Healing may, at its sole discretion, use additional payment processing companies, in which case Shabequay Healing will update this Privacy Policy accordingly.

Shabequay Healing takes care in disposing of or destroying personal information to prevent unauthorized parties from gaining access to the information. Shabequay Healing also ensures that its employees with access to personal information are made aware of the importance of maintaining the confidentiality of personal information. Finally, Shabequay Healing protects personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

7. Accuracy

Shabequay Healing is committed to keeping your personal information as complete, up-to-date, and accurate as is necessary for the purposes for which it is to be used. Shabequay Healing will promptly correct or complete any personal information found to be inaccurate or incomplete. Where appropriate, Shabequay Healing will transmit amended information to third parties having access to the personal information in question.

8. Complaints

Shabequay Healing will promptly investigate all complaints concerning our compliance with the Privacy Policy and our dealings with your personal information. If a complaint is found to be justified, Shabequay Healing will take appropriate measures to resolve the complaint including, if necessary, amending Shabequay Healing policies and procedures. A user will be informed of the outcome of the investigation regarding his or her complaint.

9. Withdrawing Consent

You may withdraw your consent to the collection, use or disclosure of your personal information by Shabequay Healing at any time, subject to legal or contractual restrictions and reasonable notice. In certain circumstances, your withdrawal of consent will result in the inability of Shabequay Healing to continue providing aspects of the Service to you. Please contact Shabequay Healing for more information regarding the implications of withdrawing consent.

10. Inquiries

To submit an inquiry, complaint, request a review of your personal information, correct or update your personal information, withdraw your consent or request more information or additional copies of the Privacy Policy contact:

Shabequay Healing Privacy Officer
privacy@shabequay.ca

11. Privacy Policy Changes

Shabequay Healing will review this Privacy Policy on a regular basis to ensure that it is relevant and remains current with changing technologies and laws and the evolving needs of Shabequay Healing and its users.