

# Forensic Guardians International Consulting Inc.

## Privacy Policy

Last Updated: January 5, 2019.

### Key terms of our Privacy Policy

- [What personal information does FGI collect and how do we collect it?](#)
- [How does FGI use your personal information?](#)
- [How does FGI share your personal information?](#)
- [How do I change my privacy choices?](#)

### 1. Introduction

Your privacy is our business.

Forensic Guardians International Consulting Inc. (“**FGI**”) was established to help you securely store your personal information. We collect, use, disclose and retain your personal information for you – not for third parties. It is important to us that you understand how we collect, use, disclose and retain your personal information, and that we do so with your informed consent. We will never sell your data.

This Privacy Policy explains how FGI collects, uses and discloses personal information, including information collected through its websites, mobile apps and correspondence and when providing products and services.

### 2. Your Consent

By providing FGI with your personal information, you consent to the collection, use, disclosure and retention of that information by FGI in accordance with this Privacy Policy and as otherwise permitted by applicable law. You may withdraw your consent at any time, subject to legal or contractual restrictions and on reasonable notice to FGI, but then you might not be able to proceed with your intended interactions or transactions with FGI or otherwise receive the full benefit of FGI’s products and services. Please refer to section 7 of this Privacy Policy to learn about your options with respect to the withdrawal of your consent.

### 3. How FGI Defines Personal Information

***“Personal information” is broadly defined and includes any information about an identifiable individual, as well as more technical information that is collected automatically. Information that is business contact information or aggregated or anonymized is not considered to be personal information.***

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In this Privacy Policy, “**personal information**” means information about an identifiable individual, such as an individual’s name and email address, but does not include (to the extent permitted by law) information that is publicly available in a telephone directory or that is business contact information that enables an individual to be contacted at a place of business. Personal Information also does not include information that has been aggregated or anonymized, as explained in section 12, below.

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#### 4. Personal Information that FGI Collects

***FGI usually collects personal information directly from you, such as when you purchase a service or product from us. We may also collect personal information automatically, such as when you visit FGI's websites.***

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##### (a) Information You Provide

You may be asked to voluntarily give your personal information to FGI when you interact with FGI, including when you subscribe to a newsletter, request information or use a product or service provided by FGI (including a mobile app). For example, we may collect:

- contact information (such as name, email address, postal address and phone number) when you make an inquiry or contact us;
- contact, likeness, voice recording, gender, date of birth, medical information, dental information, and other biological and genetic information when you purchase a product or service from us, such as the Identity Vault service;
- contact information and employment information when you apply for an employee position with FGI; and
- communications preferences and correspondence you send to us.

In those circumstances, you can choose not to provide certain requested personal information, but then you might not be able to proceed with your intended interaction or transaction with FGI or otherwise receive the full benefit of the desired product or service.

If you give FGI the personal information of another individual, then you are solely responsible for complying with all applicable laws, including obtaining that individual's valid consent to your collection and disclosure of that individual's personal information to FGI and to FGI's use, disclosure and retention of that individual's personal information.

##### (b) Automated Collection

FGI may automatically collect certain information regarding your use of FGI's websites or mobile apps made available to you, such as the dates and times that you use the websites or mobile apps, the browsers, operating systems, software and devices that you use to access the websites or mobile apps and details of your use of the websites or mobile apps.

If you install a mobile app provided by FGI on your mobile device, then the settings of the device may permit the automatic transmission to FGI of diagnostic information and other information (including location data) regarding your mobile device and your use of the mobile app. If you do not want an FGI mobile app to access your device's location data, then you might be able to use your device settings to disable the transmission of location data but you might not be able to proceed with your intended interactions with FGI or otherwise receive the full benefit of FGI's products and services.

FGI's websites, mobile apps, email messages and advertisements may use technologies (e.g. cookies, web beacons, tokens, pixels or tags) to collect information that assists FGI to improve its products, services, customer communications and advertising and to prevent fraud. FGI may use information collected through technological means to recognize you as a user of FGI's websites or mobile apps, to facilitate and improve your use of FGI's websites or mobile apps, to confirm that messages have been delivered to and opened by you and to provide you with targeted advertisements. You may choose to decline or disable cookies if your web browser or device permits, but doing so may affect your ability to access or use certain features of a website or mobile app. More information about cookies used for interest-based advertising is set out in section 5(c) below.

Some of the information automatically collected by technological means is non-personal information (because the information does not identify you), and FGI will deal with that non-personal information as explained below in this Privacy Policy unless applicable law requires otherwise.

### (c) **Information from Other Sources**

Occasionally, FGI may collect personal information from third parties. FGI will only collect your personal information from a third party if we have obtained your consent to do so, if you have provided your consent to the third party, or if we are legally required or permitted to do so.

For example:

- If you have signed up for FGI's Identity Vault service, we may request your consent to contact your health care providers to obtain your medical information directly from them.
- If you apply for an employment position with FGI, we may request your consent to obtain a criminal record check in connection with your application.

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## 5. **How FGI Uses Personal Information**

***FGI may use your personal information to provide our products and services to you, for our own internal purposes and for additional purposes, subject to your right to withdraw consent as set out in this Privacy Policy.***

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### (a) **General**

FGI may use your personal information collected by FGI for purposes relating to or arising from your relationship and transactions with FGI and as otherwise set out in this Privacy Policy or permitted by applicable law, including:

- to administer your relationship with FGI, including to contact and correspond with you regarding the products and services you have purchased from FGI and related matters;
- to facilitate your interactions and transactions with FGI;
- to provide products and services to you;
- to process and respond to your inquiries, requests and other communications;
- to provide you with information (including by email and other electronic messages) regarding FGI and its business, products and services and products and services offered by other businesses, to the extent permitted by applicable law;
- to maintain, protect and improve FGI's products and services and to develop new products and services;
- to protect and enforce FGI's legal rights, interests and remedies and to protect the business, operations and customers of FGI or other persons; and
- to comply with legal and regulatory requirements.

Subject to your right to withdraw consent as described in this Privacy Policy, FGI may also use your personal information collected by FGI for the following additional purposes that are not required for FGI to provide you with products and services:

- to communicate with you for the purposes of providing you with advertising and marketing messages pertaining to additional products or services that may be of interest to you;
- to administer and facilitate your participation in promotions related to FGI; and
- to conduct surveys on the quality of our products and services.

FGI may use your personal information to create non-personal information, and FGI may then use, disclose, transfer and retain the non-personal information as set out below in this Privacy Policy.

(b) **Confidential Profile**

FGI may develop and maintain a confidential profile for you for use by FGI to provide information, products and services to you, to facilitate your dealings with FGI and as otherwise set out in this Privacy Policy.

(c) **Interest-Based Advertising**

FGI's websites may use cookies, web beacons and other tracking technologies to store on your browser information about your use of FGI's websites (including the Internet address of your computer) so that FGI's third party service providers (such as Facebook) may display advertisements likely to be of interest to you when you access other websites, social media sites or other online services.

You may opt out of receiving interest-based advertisements on a website, social media site or other online service by using their advertising preferences settings. If you do so, you may still see FGI's ads on the site, but the ads will not be based on tracking technologies.

Information about online interest-based advertising and how you can opt out of receiving those ads are available here: [youradchoices.ca/choices](http://youradchoices.ca/choices), [aboutads.info/choices](http://aboutads.info/choices) and [www.networkadvertising.org](http://www.networkadvertising.org). Information about ads on Facebook is available here: [https://www.facebook.com/help/516147308587266/?helpref=hc\\_fnav](https://www.facebook.com/help/516147308587266/?helpref=hc_fnav).

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**6. How FGI Discloses Personal Information**

***FGI may disclose your personal information to our service providers, and to other persons in accordance with specific consents that you give to us. In some situations, we may also disclose your personal information to third parties as permitted or required by law (for example, in response to a court order or investigation).***

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(a) **General**

FGI discloses your personal information for purposes relating to or arising from your relationship and transactions with FGI and as otherwise set out in this Privacy Policy or permitted by applicable law. Only those employees of FGI or trusted service providers who need access for business reasons, or whose duties reasonably so require, will be granted access to your personal information. FGI will not sell, rent or trade your personal information to any third party. Please refer to section 7 of this Privacy Policy to learn about your options with respect to the withdrawal of your consent.

(b) **Specific Consents**

FGI may disclose your personal information to other persons in accordance with express or implied consents that you give during your interactions and transactions with FGI.

(c) **Affiliates and Business partners**

FGI and its affiliates may share your personal information with each other and use it in connection with our relationship with you for the provision of our products and services, all in accordance with this Privacy Policy.

In certain circumstances, we may share personal information with our business partners with your consent or as otherwise permitted by applicable law.

(d) **Suppliers and Service Providers**

FGI may disclose your personal information to its suppliers and service providers (including cloud service providers, payment processors and DNA sample storage facilities) to assist FGI in the provision of information, products and services to you, to provide services to FGI, to assist FGI to use your personal information as set out in this Privacy Policy and as otherwise permitted by applicable law.

#### (e) **Law Enforcement/Legal Disclosures**

FGI may disclose your personal information as required or authorized by applicable law, including to comply with a subpoena, warrant or court or arbitral order or litigation disclosure obligation. FGI may disclose your personal information to law enforcement agencies or other independent organizations if FGI reasonably believes the disclosure is necessary or appropriate in connection with national security, law enforcement or other issues of public importance, or if FGI reasonably believes the disclosure is necessary or appropriate to protect and enforce FGI's legal rights, interests and remedies or to protect the rights, interests, business, operations or customers of FGI or other persons (including to detect and prevent fraud and other illegal activities, or to enforce any of the terms of use, terms of service or other agreements that govern access to or use of any of FGI's products or services). FGI has no control over, or responsibility or liability for, the use, disclosure or retention of your personal information by the agencies, independent organizations or other persons to whom FGI discloses the information in the foregoing circumstances, and the collection, use, disclosure and retention of the disclosed information by those agencies, independent organizations or other persons is not subject to this Privacy Policy.

#### (f) **Business Transactions**

FGI may disclose your personal information in connection with a proposed or actual business transaction in which FGI is involved (e.g. a corporate amalgamation, reorganization, merger or acquisition, or the sale or transfer of some or all of FGI's business or assets), and in those circumstances FGI will require the information recipient to agree to protect the privacy of your personal information in accordance with applicable law.

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### 7. **Your Right to Withdraw Consent**

***When you interact with FGI, through its websites, mobile apps, in person or by other means, you consent to the collection, use, disclosure and retention of your personal information as set out in this Privacy Policy.***

***You have a right to withdraw your consent at any time. However, if you withdraw your consent to purposes that are integral to the provision of our products and services, we may have to limit the products or services we are able to provide to you. Other purposes, such as advertising purposes, are not integral to the provision of our products and services and your withdrawal of consent to those purposes will not impact the provision of our products and services to you.***

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As described in section 2 of this Privacy Policy, in general, when you interact with FGI, you consent to the collection, use, disclosure and retention of personal information as set out in this Privacy Policy. You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.

**Withdrawing your consent for integral purposes.** You may withdraw your consent for purposes that are integral to the provision of our products and services, subject to legal or contractual restrictions and on reasonable notice to FGI, but then you might not be able to proceed with your intended interactions or transactions with FGI or otherwise receive the full benefit of FGI's products and services.

**Withdrawing your consent for additional purposes.** Withdrawing your consent for additional purposes that are not integral to the provision of our products and services will not impact the provision of our products and services to you. You may withdraw your consent to your personal information being used or shared for the following additional purposes:

- to communicate with you for the purposes of providing you with advertising and marketing messages pertaining to additional products or services that may be of interest to you. You can always limit the electronic communications that FGI sends to you. To opt-out of commercial emails, simply click the link labeled "unsubscribe" at the bottom of any commercial electronic communication we send you. Please note that even if you opt out of promotional communications, we may still need to contact you with important information about your product or service; and
- to conduct surveys on the quality of our products and services.

To withdraw your consent, you may contact FGI's Privacy Officer by mail or email at: Forensic Guardians International, P.O. Box 93044, Caulfield Village, West Vancouver, B.C. V7W 3G4; email: [privacy@forensicguardians.com](mailto:privacy@forensicguardians.com).

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## 8. Location of Personal Information

***Generally, we store your personal information in Canada. Some of our service providers may process, store and use your personal information outside your province or territory or in other countries. As a result, your personal information may be subject to the laws of other jurisdictions.***

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In general, FGI stores, accesses and uses personal information in Canada. Some of FGI's service providers may process, store and use your personal information at facilities outside of your province, territory or Canada in the course of providing their services to FGI. When FGI engages a service provider that operates outside of Canada, personal information may be stored, processed, accessed or used in any country in which the service provider operates. The personal information protection laws of those other countries might be different from the laws of the jurisdiction in which you reside, and might permit courts, government, law enforcement agencies, regulatory agencies and security authorities to access your personal information without notice. FGI uses all reasonable safeguards, including contractual requirements with our service providers, to protect your personal information wherever it is located.

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## 9. Retention of Personal Information

***We only retain your personal information for the period necessary to fulfill the purpose for which it was collected, unless required or permitted by applicable law.***

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FGI will retain your personal information for the period reasonably necessary for the purposes set out or referenced in this Privacy Policy and to comply with FGI's legal obligations or enforce or protect FGI's legal rights, or a longer period required or permitted by applicable law.

FGI will delete or dispose of your personal information, or depersonalize the information, when FGI is no longer required or permitted by applicable law to retain the information for the purposes set out or referenced in this Privacy Policy.

If you ask FGI to delete your information, we will do so within a reasonable period of time. Please note that FGI may need to retain some information about you in order to satisfy our legal and security obligations. For example, some of your information may remain in back-up storage even if you ask FGI to delete it.

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## 10. Protection of Personal Information

***We strive to protect your personal information against unauthorized access. We maintain administrative, technical and physical safeguards to protect your personal information.***

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The privacy and security of your personal information is extremely important to us. FGI uses reasonable safeguards – including administrative, physical and technical security and safeguarding measures – appropriate to the sensitivity of the personal information in FGI's possession or under FGI's control to help protect the information from unauthorized access, collection, use, disclosure, deletion or similar risks. For example, we use industry-standard encryption technology to secure sensitive personal information when it is being collected and transmitted over the Internet as well as firewalls, site monitoring and intrusion detection software.

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## 11. Accuracy and Access to Personal Information

***You have the right to access your personal information and to have it corrected by contacting us as set out in section 19 below.***

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FGI will rely on you to ensure that the personal information that you provide to FGI is as accurate, complete and up to date as necessary for the purposes for which FGI uses the personal information. You will promptly notify FGI of any changes to the personal information that you provide to FGI using the procedures made available for that purpose by FGI or by contacting FGI's Privacy Officer using the contact information set out in section 19 below.

You may reasonably request access to your personal information collected by FGI and information about FGI's use, disclosure and retention of that personal information by submitting a written request to FGI's Privacy Officer using the contact information set out in section 19 below. Subject to applicable exceptions and limitations prescribed by applicable law, you will be given reasonable access to your personal information and you will be entitled to verify the accuracy and completeness of your personal information and to have the information revised as appropriate. You may be required to pay a reasonable fee for access to your personal information. FGI may decline to process a request that is unreasonably repetitive, frivolous, vexatious or impracticable, that infringes or jeopardizes the privacy of other persons, or for other reasons permitted by applicable law.

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## 12. Non-Personal Information

***FGI may use non-personal information (information that is not about an identifiable individual) for any purpose, unless it is combined with personal information.***

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FGI may use your personal information to create and collect non-personal information (information that is not about an identifiable individual), including personal information that has been aggregated or otherwise depersonalized so that the information no longer relates to an identifiable individual. FGI may use, disclose, transfer and retain non-personal information for any purpose and in any manner whatsoever. If non-personal information is combined with your personal information, then FGI will treat the combined non-personal information as personal information for the purposes of this Privacy Policy for as long as the non-personal information is combined with your personal information.

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## 13. Other Websites and Businesses

***This Privacy Policy only addresses the collection, use, disclosure and retention of personal information by FGI. Other websites have their own privacy policies and practices.***

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FGI's websites and correspondence (including emails and messages) may include advertisements for products and services offered by independent businesses or links to websites operated by independent businesses. FGI has no responsibility or liability for, or control over, those other websites, online services or businesses, their products or services, or their collection, use, disclosure or retention of your personal information. This Privacy Policy does not apply to the collection, use, disclosure or retention of your personal information by those websites, online services and independent businesses. If you have questions about how those websites, online services or independent businesses collect, use, disclose or retain personal information, please contact the owner or operator of the website, service or business.

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#### 14. Social Media and Similar Situations

***This Privacy Policy only addresses the collection, use, disclosure and retention of personal information by FGI. Social media websites have their own privacy policies and practices and you are responsible for the personal information you post to those websites.***

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When you use certain aspects of FGI's websites or other services to access or post information to social media websites (e.g. there may be links to FGI's Facebook, Twitter, Instagram or LinkedIn pages), the personal information that you post or share in connection with these third party websites is visible to other persons and can be read, collected, used and disclosed by other persons, including to send unsolicited messages to you. When you click on a link to a social media website, you will leave the FGI websites and go to that social media website. Any information provided to such third party social media websites and other websites is governed by their own privacy policies, which you may read on the applicable website. You are solely responsible for the personal information that you choose to post or share in those situations. FGI has no control over, or responsibility or liability for, the collection, use, disclosure and retention of the personal information that you disclose in those situations, and this Privacy Policy does not apply to the collection, use, disclosure or retention of your personal information by those websites.

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#### 15. Children and Personal Information

***We do not knowingly collect personal information from children under 13 years of age without the consent of a legal guardian.***

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We do not knowingly collect personal information from children under 13 years of age without the consent of a legal guardian. To purchase our products and services, we must obtain the consent of your parent or legal guardian if you are under the age of majority and consent is a requirement in the jurisdiction of your residence. If we learn we have collected or received personal information from a child where parental confirmation was required, we will delete that information. If you believe we might have any information from or about a child where we should have obtained parental consent, please contact FGI's Privacy Officer using the contact information set out in section 19 below.

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#### 16. Disclaimers, Liability Exclusions/Limitations and Disputes

***The other agreements you have with FGI may contain disclaimers, liability exclusions and limitations and dispute resolution provisions that apply to matters arising in relation to this Privacy Policy, to the extent permitted by applicable law.***

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The agreements (including any website terms of use) that you accept when you apply or register for, or order or use, FGI's products and services contain important provisions, including provisions disclaiming, limiting or excluding the liability of FGI and other persons (including service providers) and provisions determining the applicable law and jurisdiction for the resolution of disputes. To the extent permitted by applicable law, each of those provisions applies to any dispute that may arise in relation to this Privacy Policy or FGI's collection, use, disclosure and retention of your personal information, and are of the same force and effect as if they were reproduced directly in this Privacy Policy. Nothing in this Privacy Policy amends any of those other agreements.

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#### 17. Changes to this Policy

***Generally, changes to this Privacy Policy will be posted to FGI's websites. Please check the "Last Updated" date at the top of this Privacy Policy and review any changes since the last version.***



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FGI may change this Privacy Policy as it applies to FGI from time to time by posting a new version of this Privacy Policy on FGI's websites. FGI's collection, use, disclosure and retention of your personal information will be governed by the version of this Privacy Policy in effect at that time. Your continued dealings with FGI after any change to this Privacy Policy will signify your consent to the collection, use, disclosure and retention of your personal information by FGI as set out in the changed Privacy Policy. Accordingly, you should check the "Last Updated" date of this Privacy Policy (at the top of this Privacy Policy) and review any changes since the last version.

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## 18. Other Matters

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- (a) **App Store Operators:** If you wish to obtain a copy of a mobile app made available by FGI from an online app store operated by an unaffiliated third party (such as Apple and Google), then you will be required to disclose your personal information to the app store operator in order to download a copy of the mobile app. FGI has no control over, or responsibility or liability for, the collection, use, disclosure and retention of your personal information by any app store operator. Each app store operator's collection, use, disclosure and retention of your personal information are governed by the app store operator's own privacy policy (not this Privacy Policy).
- (b) **Notices to You:** You consent to FGI sending you emails (to the email address you provide to FGI) regarding this Privacy Policy and related matters.
- (c) **English Language:** You and FGI have each expressly requested and required that this Privacy Policy and all other related documents be drawn up in the English language. Les parties conviennent et exigent expressement que cette Politique de Confidentialité et tous les documents qui s'y rapportent soient rédigés en anglais.

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## 19. Who Do I Contact with Privacy Questions?

If you have any comments or questions about this Privacy Policy or how FGI deals with your personal information, please contact FGI's Privacy Officer by mail or email at: Forensic Guardians International, P.O. Box 93044, Caulfield Village, West Vancouver, B.C. V7W 3G4; email: [privacy@forensicguardians.com](mailto:privacy@forensicguardians.com).

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