

# Privacy Policy

## Introduction

The e-learning platform (“Site”) is hosted by Premergency Inc. (“Host”, “us”, “we”, “our”) on behalf of the Alcohol & Gaming Commission of Ontario (“AGCO”).

The Host and AGCO each take your privacy as a user (“user”, “you”, “your”) of this Site very seriously. This Privacy Policy applies to the behaviour and treatment of your information by us and AGCO.

This Privacy Policy is incorporated into and forms part of our Terms of Use (“TOU”), which outlines the terms and conditions you agree to when accessing and using the Site and the service. All capitalized terms used in this Privacy Policy and not otherwise defined herein have the meaning ascribed to such terms in the TOU.

## Consent

By using this Site, the service, or voluntarily providing personal information while using any feature of the Site or service, you consent to the Host and to AGCO, using and disclosing your personal information as regulated by the Freedom of Information and Protection of Privacy Act (“FIPPA”), the Personal Information Protection and Electronic Documents Act (Canada) (“PIPEDA”), and other legislation as applicable in Canada and the Province of Ontario, as amended.

Click this [link \(https://www.agco.ca/privacy-statement-details\)](https://www.agco.ca/privacy-statement-details) for more information on AGCO’s privacy statement.

When you voluntarily provide us with personal information you consent to our collecting it and using it pursuant to this Privacy Policy.

If you decide to withdraw your consent to allow us to collect, use, disclose your personal information that we consider reasonable to fulfill the needs of our relationship and/or your use of the Site and the service, we may not be able to continue to provide you with the service offered through the Site.

By using the Site and services and/or providing us with Personal Information you agree that you are at least the age of majority in Ontario or if you are under 18 years old you agree that you have the consent of your parent/legal guardian. This Site and the services are not intended for children under the age of 13. If you are under the age of 13 years of age, then please do not use the Site or service.

By using our Site, you consent to this Privacy Policy.

## What information do we collect?

### *Basic Identifying Information*

We collect information from you when you register to use this Site. This information includes but is not limited to your:

- Screen Name
- First and last name
- Email Address

### *User-Behaviour Information*

We collect information about your behaviour on the site including but not limited to:

- Documents downloaded
- Videos viewed
- Pages views
- Time spent on the Site

### **Why do we collect this information?**

#### *Tracking Completion of Training Modules*

Behavioural information collected enable us to determine the completion status and completion rates of each training module available on the Site. We can also use such information to confirm which users have completed training module(s).

#### *To Improve the Website & Software*

The principal uses of your information by the Host is to track your completion of training module(s) and to help improve the Site and the technology that underpins it. We are continually striving to improve your experience based on your feedback.

We may create statistical, aggregated data relating to our users and the service for analytical purposes. Aggregated data includes data derived from personal information or other information and/or obtained by us from other sources in aggregated, anonymous form and does not identify any individual ("Aggregate Data"). Subject to applicable law and regulations, we may use Aggregate Data to understand our users and to develop, improve and/or market our services. We may provide Aggregate Data to third parties.

We may de-identify or anonymize your personal information so that you are not individually identified and provide that information to our partners and/or affiliated organization. We may also combine your de-identified information with that of other users to create aggregate de-identified data that may be disclosed to third party who may use such information to understand how often and in what ways people use our service, so that we can provide you with an optimal online experience. For example, we may use information gathered to create a composite profile of all users of the Site to understand user and community needs and to design appropriate services. However, we never disclose Aggregate Data to a partner in a manner that would identify you personally, as an individual.

### **Who has access to this information?**

When you register for a user account you provide two types of information:

- Information available to the Host and AGCO; and
- Information available to the Host only.

#### *Information available to the Host and AGCO includes:*

- Publicly available information;
- All information from the Registration form; and
- General site activity such as document downloads and participation in training module(s).

#### *Information Available to the Host only:*

Information which is available only to the Host is restricted to your IP address for Site security purposes, as well as information about how you use our product collected by cookie technology, web beacons and other similar devices on this Site from time to time to enhance functionality and navigation for our users. Information tracked through these mechanisms include, but is not limited to: (i) your computer's internet protocol ("IP") address; (ii) web browser type and operating system;

(iii) dates and times of visits; and (iv) referring website addresses. If you wish to disable cookies, refer to your browser help menu to learn how to disable cookies. If you disable cookies, you may be unable to access some features on this Site. The Host may also use graphic tags, internet tags and similar web beacon type functions that allow us to count the number of Users who visit a page or access particular cookies. Finally, the Host may include web beacons embedded in an HTML formatted e-mail messages that we send to determine which emails messages were opened. Cookies and web beacons do not collect or contain your personal information.

### **Does the Host disclose any information to third parties other than to AGCO?**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our Site, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our Site TOU and policies, or protect our or other's rights, property or safety.

### **Third Party Links**

Occasionally, AGCO may include links to third-party sites that are independently owned and operated by other entities which are not associated or affiliated with AGCO. You understand and agree that the Site's Privacy Policy is applicable only while using this Site. When you click on third-party links on our Site, the links may direct you away from our Site. These third-party linked sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. If you decide to access third party linked sites you do so at your own risk.

### **Terms of Use**

Please also visit our TOU section establishing the use, disclaimers, and limitations of liability governing the use of our Site.

### **Access and update to Personal Information**

We support your right to access your personal information that we have collected. To make a request for access to your personal information that we have on file, please contact us at the contact information as set out below. Please note that your right to complete access cannot be guaranteed due to certain legal restrictions to your right to access. For example, you will not have access to files that contain personal information about other users or our confidential information. If you are denied access, we will notify you of the reason and any recourse available to you.

We will keep your personal information as complete, accurate and up to date as necessary. To amend or update your personal information to ensure its completeness and accuracy, please contact us at the contact information set out below. If there is a discrepancy or disagreement about the accuracy of your personal information this will be noted on your file. Notwithstanding anything in this Privacy Policy, if your personal information is provided as part of your comment, then it may not be possible to retract it if it is re-published.

### **Changes to this Privacy Policy**

We reserve the right, at our sole discretion, to update, change or replace any part of this Privacy Policy without further notice or liability. If we do this, we will post the changes to this Privacy Policy on the Site and will indicate at the bottom of this Privacy Policy the date this Privacy Policy was last

revised. It is your responsibility to check our Site periodically for changes. Your continued use of or access to our Site or the service following the posting of any changes to this Privacy Policy constitutes acceptance of those changes. Notwithstanding the above, we will not change the use of your personal information unless you consent to such change in use.

**Who do I contact for more information?**

The information you submit to the Site is collected pursuant to the *Cannabis Licence Act, 2018*. The information will be used in connection with creating your account on the Site and tracking your use of cannabis training programs offered on the Site. The information you submit may be used by AGCO in accordance with this Privacy Policy. For questions about the collection of this information, please contact the Manager, Training & Development, Alcohol and Gaming Commission of Ontario, 90 Sheppard Avenue East, Suite 200, Toronto, Ontario M2N 0A4 / Telephone: 416-326-8700 or 1-800-522-2876 (toll-free in Ontario).

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*Privacy Policy last revised: March 31, 2021*