



# Privacy Policy

Effective: February 1, 2013

Last Updated: August 28, 2013

Empatico (“**Empatico**”, “**we**”, or “**us**”) takes the privacy and protection of personal information very seriously. BY VISITING AND USING [www.empatico.ca](http://www.empatico.ca) OR [www.pilot.empatico.ca](http://www.pilot.empatico.ca) (“**Site**”) OR REGISTERING FOR SERVICES AND CREATING AN ACCOUNT, YOU ACKNOWLEDGE THAT YOU ACCEPT THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY (“**Privacy Policy**”). Unless otherwise defined herein, capitalized terms shall have the meanings assigned to such terms in the Company Terms of Use Agreement that you can find on the [Terms of Use](#) page and which incorporates this Privacy Policy by reference.

## **What this Privacy Policy Covers**

This Privacy Policy covers our treatment of personally identifiable information (“**Personal Information**”, as more fully defined below) that we gather when you are accessing our website, [www.empatico.ca](http://www.empatico.ca) or [www.pilot.empatico.ca](http://www.pilot.empatico.ca). This policy does not apply to processes we do not control, or to individuals that we do not employ or manage.

“**Personal Information**” is information that is personally identifiable such as names, addresses, e-mail addresses, or phone numbers, as well as other non-public information that is associated with the foregoing.

“**Anonymous Information**” means information that is not associated with or linked to your Personal Information. Anonymous Information does not permit the identification of individual persons.

**We collect and use Personal Information and Anonymous Information as described in this Privacy Policy from the users of the Services.**

## **Personal Information We Collect**

In order for you to use certain of the Site’s Services, you may be asked to provide us with certain Personal Information. Personal Information includes, without limitation:

- Contact Data, such as your name, company name, mailing address, and e-mail address;
- Financial Data, such as your account or credit card number;
- Demographic Data, such as your postal / zip code, and age.

In each case, you will be asked to provide Personal Information; the Site will not gather it surreptitiously. Empatico may supplement the Personal Information you provide with additional Personal Information gathered from public sources or from third-parties (e.g. consumer reporting agencies) who may lawfully provide such information to us.

You are under no obligation to provide Personal Information, with the caveat that your refusal to do so may prevent you from using certain of the Site’s Services.

## **Personal Information Collected Automatically**

As you use the Site and Services, certain information may be collected passively, including your Internet protocol (IP) address and the browser that you use to visit the Site. Empatico also stores a small text file called a “**Cookie**” on your computer to store your login information and your personal preferences for the Services. Empatico may use both session Cookies (which expire when you close your web browser) and persistent Cookies (which stay on your computer until you delete them). While you will still be able to use the Services if you disable Cookies in your browser, certain parts of the Service may not function as effectively.

Since the foregoing information may be collected when you are signed into the Services, this information may be associated by us with Personal Information that we have collected from you.

## **Use of Information We Collect**

### *Uses of Personal Information*

We use the information you provide to:

- Administer your account with us, deliver our Services and customize the service we provide to you.
- Respond to your inquiries or customer service requests.
- In order to deliver our Services, we may share information with third parties. For example, to process payments made by you, we share some of your information with the credit card processing company.
- Enable you to share you information and communicate with other Users, or provide (usually at your option) your personal details to third parties offering combined services with Empatico.

In general, information (including Personal Information) you submit to us is used to provide you and others with the Services, to respond to requests that you make, to improve our Services and to better tailor the features, performance and support of the Services.

We may create Anonymous Information records from Personal Information by excluding information (such as your name) that makes the information personally identifiable to you. We may also create Anonymous Information on how you use the Services. We may use this Anonymous Information for internal purposes, such as analyzing usage patterns so that we may enhance the Service, and we also reserve the right to use and disclose any Anonymous Information at our discretion.

Empatico collects information under the direction of its Clients, and has no direct relationship with the individuals whose personal data it processes.

## **Feedback**

If you provide feedback about the Services to us, we may use and disclose such feedback for any purpose, provided we do not associate such feedback with your Personal Information. We will collect any information contained in such feedback and will treat the Personal Information in it in accordance with the Privacy Policy.

## **Disclosure of Personal Information**

Personal information about our customers is an integral part of our business. We do not share Personal Information with unrelated third parties for their direct marketing purposes. We share your Personal Information only with our partners and affiliates as described below. We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Examples include processing credit card payments with a secure third party provider. Unless we tell you differently, these agents do not have any right to use Personal Information we share with them beyond what is necessary to assist us.

We also disclose Personal Information when required to do so by law, or in response to a subpoena, court order, or other legal mechanism, or when we believe, in our sole discretion, that disclosure is reasonably necessary to protect the property or rights of the Company, third parties or the public at large.

### **Data Retention**

We will retain the personal data we process on behalf of our Clients for as long as needed to provide Services to our Client. We will retain and use this Personal Information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

### **Links to Other Web Sites**

The Services may contain links to other web sites that are not owned or controlled by Empatico. The provision of such links is for your convenience and does not signify our endorsement of such web sites or location or its contents. We have no control over, do not review and are not responsible for the privacy policies of or content displayed on such other web sites. Please be aware that the terms of this Privacy Policy do not apply to any outside websites.

### **Blog**

Our Web Site offers a publicly accessible Blog. You should be aware that any information you provide in these areas may be read, collected and used by others who access them. To request removal of your personal information from our Blog, contact us via one of the methods listed below. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

### **Social Media**

Our Web Site includes Social Media Features, such as the Facebook Like button. These Features may collect your IP address, which page you are visiting on our Site, and may set a Cookie to enable the Feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

### **Referrals**

If you choose to use our referral service to tell a friend about our site, we will ask you for your friend's name and e-mail address. We will automatically send your friend a one-time e-mail inviting him or her to visit the Site. We do not store this information for future use.



# Privacy Policy

## **Testimonials**

With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial you can contact us via one of the methods listed below.

## **Privacy of Minors**

We do not intentionally collect or maintain information from persons under the age of 18.

## **Security and Confidentiality**

Empatico has put in place commercially reasonable and appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. However, no company, including Empatico, can fully eliminate security risks associated with Personal Information.

## **Changes in this Privacy Policy**

The Privacy Policy is subject to occasional revision. We will post any revised version of the Privacy Policy on this page. If we make any material changes to it, we will also send you an e-mail to the last e-mail address you provided to us (if any) or by means of a prominent notice on our site prior to the changes taking effect. Any amended Privacy Policy will be effective ten (10) calendar day after posting for existing members, and upon posting for any persons who become members after such posting.

Continued use of our Services following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

If you have any questions or suggestions regarding our Privacy Policy, please contact us by sending an email to [info@empatico.ca](mailto:info@empatico.ca).