



8560 Tremaine Rd.  
Milton, ON - L9T 2X3

## PRIVACY POLICY

### Introduction

At Enable Education, a division of Enable Training and Consulting, Inc. (“Enable Education”, “We” or “Us” and terms of similar meaning), we are committed to your privacy. This means we do not transfer, distribute, disclose, rent or sell any of your personal information to third parties except as provided for in this policy (the “Privacy Policy”) or as specifically consented by you.

Enable Education has developed policies and procedures consistent with the Personal Information Protection and Electronic Documents Act (“PIPEDA”), and other relevant privacy laws. By accepting this Privacy Policy in registration or by visiting and using our Thinkscape Software Platform (the “Site”) and/or utilizing the services through the Site (the “Services”), you expressly consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to our End User License Agreement (“EULA”).

### Scope

This Privacy Policy applies to all personal information (“Personal Information”) collected, used or disclosed by Enable Education from our clients and their representatives whom they give user access to their account, as well as students, advisors, instructors and teachers who may use the Services (collectively “Users”).

### Accountability

Enable Education is responsible for the Personal Information under our possession and control. We have designated a Privacy Officer to be responsible for our compliance with this Privacy Policy and privacy legislation.

### Information We Collect

#### a. Personal Information

Personal information is any information recorded in any form that identifies or can identify an individual and includes any information provided to us by you or your Users in using our Site and Services. Personal information includes, but is not limited to, the following:

registration information and user profile information that you provide to us in creating your account to use our Services. this is restricted to name and email address only;

information about your school or educational institution, such as school name and location;

User registration information, including profile pictures; APPLICABLE ONLY TO TEACHERS AND PARENT ACCOUNTS

and any information that Enable Education collects from you intended to improve and personalize your service experience.

## b. Non-Personally Identifiable Information

Personal information does not include information that is aggregated or anonymized in such a manner that it cannot be connected to you or any User. This may include grades and participation rates aggregated among many Users. Such information by itself or together cannot be tracked to a specific individual's personally identifiable information.

How do we use Personal Information?

Enable Education collects Personal Information for the following purposes:

to provide Services to you and Users;

to establish and maintain responsible commercial relations and to communicate with you in order to provide service. This includes, but is not limited to, communications relating to billing, advertising, promotion and account verification;

to respond to any correspondence, you may direct to us;

to understand, research, and improve our Services;

for customer and User needs and preferences;

to direct advertisements to you about Our company and our products and services that may be of interest to you;

to enforce our EULA and other service agreements;

to provide you with system or administrative messages;

to meet legal and regulatory requirements;

and for any other reasonable purposes for which you may have provided your express consent or in which your consent can be reasonably implied.

How do we use Non-Personally Identifiable Information?

In an ongoing effort to better understand and serve the users of our Services and improve our Service and user functionality, we conduct research on our customer and User demographics and behavior based on Personal Information and other information that we have collected. This research can be used to provide our customers with statistics and metrics that may be of interest to them (for example statistical data related to programs). This research will be compiled and analyzed on an aggregate basis and this aggregate does not identify any individual and therefore is considered and treated as Non-Personally Identifiable Information under this Privacy Policy.

## Consent

We respect your privacy and, unless otherwise required by law, we will not collect, use or disclose your Personal Information without your prior consent. Your consent may be expressed or implied. You may expressly give your consent in writing, verbally or through any electronic means. In certain circumstances, your consent may be implied by your actions. For example, providing us Personal Information to register for our Services is implied consent to use such information to provide you the associated services.

Where appropriate, Enable Education will generally seek consent for the use or disclosure of the information at the time of collection. In certain circumstances, consent with respect to use or disclosure may be sought after the information has been collected but before use (for example, when Enable Education wants to use information for a purpose other than those identified above). In obtaining consent, Enable Education will use reasonable efforts to ensure that a customer is advised of the identified purposes for which Personal Information collected will be used or disclosed.

The form of consent sought by Enable Education may vary, depending upon the circumstances and type of information disclosed. In determining the appropriate form of consent, Enable Education shall take into account the sensitivity of the Personal Information and the reasonable expectations of our customers and Users. Enable Education will seek express consent when the information is likely to be considered sensitive. Implied consent will generally be appropriate where the information is less sensitive.

You may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice, however, withdrawing consent may result in our inability to provide you with the Services and accordingly losing access to the Site. In order to withdraw consent, you must provide notice to Enable Education in writing.

#### Limiting Use, Disclosure and Retention

Unless required by law, or in connection with a business transaction, Enable Education shall not use or disclose or transfer Personal Information for any purpose other than those described above without first identifying and documenting the new purpose and obtaining your consent, where such consent may not reasonably be implied.

As noted above, Enable Education does not disclose your Personal Information to third parties. Notwithstanding, your Personal Information may be transferred to third party suppliers, contractors and agents (“Affiliates”) who are contracted by Enable Education to assist it in providing and developing products and services, for example customer service and user support. Such Affiliates will only use your Personal Information for the purposes identified in this Privacy Policy. Such Affiliates may be located outside of Canada, including in the United States, and your Personal Information may be collected, used, disclosed, stored and processed in such jurisdictions for the purposes described in this Privacy Policy. Enable Technology takes reasonable contractual or other measures to protect your Personal Information while processed or handled by such Affiliates. If your Personal Information is located outside Canada it will be subject to legal requirements in those foreign countries applicable to our service providers, for example, lawful requirements to disclose Personal Information to government authorities in those countries.

In the event your Personal Information is disclosed to a third party pursuant to a business transaction (including a potential sale or financing), Enable Education will ensure that it has entered into an agreement under which the collection, use and disclosure of the information is related to those purposes that relate to the transaction.

Subject to the foregoing, only Enable Education’s and our Affiliates’ employees with a business need to know, or whose duties reasonably so require, are granted access to Personal Information about our Users. All such employees will be required as a condition of employment to contractually respect the confidentiality of your Personal Information.

Enable Education will retain Personal Information for only as long as required to fulfill the identified purposes or as required by law. Personal Information that is no longer required to fulfill the identified purposes will be destroyed, erased or made anonymous according to the guidelines and procedures established by Enable Education.

#### Using the Site & Cookies

In order to improve the Site, we may use small files commonly known as “cookies”. A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer or mobile phone (your “device”) from the Site and is stored on your device’s browser or hard drive. Cookies are used in analyzing trends, administering the site, tracking users’ movements around the site and to gather demographic information about our user base as a whole.

The cookies we use on the Site won’t collect personally identifiable information about you and we won’t disclose information stored in cookies that we place on your device to third parties. We use cookies to remember users’ settings, store login addresses, authenticate users, run website experiments, and store analytics data.

Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org). This website will also explain how you can delete cookies which are already stored on your device.

#### Cookies from third parties

We use Google Analytics, a web analytics service provided by Google Inc. ("Google") on the Site. Google Analytics uses "cookies", which are text files placed on your computer, to help the Sites analyse how users use the Site. The information generated by the cookie about your use of the Sites (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Site, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Sites. By using the Site, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

#### How can I Access my Personal Information?

Upon request, Enable Education will provide information to a User regarding the existence, use and disclosure of his or her Personal Information. Enable Education will respond to an application for individual access to Personal Information within a reasonable time and at minimal or no cost to the individual. A User may challenge the accuracy and completeness of the information and have it amended as appropriate.

NOTE: In certain circumstances, Enable Education may not be able to provide access to all the Personal Information it holds about a User. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, or information that is subject to solicitor-client or litigation privilege. Enable Education will provide the reasons for denying access upon request.

#### Safeguards

Enable Education protects your Personal Information by security safeguards appropriate to the sensitivity of the information. Enable Education will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

Our methods of protection include:

Physical measures, such as filing cabinets which are kept locked when not in use and restricted access, both to Enable Education's place of business in general and to internal offices as well;

Organization measures, such as security clearances and limited access on a need to know basis; and

Technological measures, such as the use of passwords, firewalls and encryption.

#### Children and Minors

We only collect personal information through the Services and/or Site from a child under 13 where that student's school, school district, and/or teacher has agreed to obtain parental consent for that child to use the Site and Services and disclose personal information to us, for the use and benefit of the learning environment. If you are a student under 13, please do not send any personal information about yourself to us if your school, school district, and/or teacher has not obtained this prior consent from your parent or guardian, and please do not send any personal information other than what we request from you in connection with the Services. If we learn we have collected personal information from a student under 13 without parental consent or if we learn a student under 13 has provided us personal information beyond what we request from him or her, we will delete that information as quickly as possible. If you believe that a student under 13 may have provided us personal information in violation of this paragraph, please contact us at [privacy@enableeducation.com](mailto:privacy@enableeducation.com).

## Challenging Compliance

An individual will be able to address a challenge concerning compliance with this Privacy Policy to Enable Education's Privacy Officer.

Enable Education will maintain procedures for addressing and responding to all inquiries or complaints from Users about Enable Education's handling of Personal Information. Enable Education shall investigate all complaints. All inquiries or complaints involving Enable Education's handling of Personal Information or compliance with this policy or with PIPEDA shall be directed to Enable Education's Privacy Officer.

The Privacy Officer will respond to all such inquiries or complaints within 14 business days of receipt. The Privacy Officer will make reasonable efforts to resolve all such complaints within 30 days of receipt of the initial complaint. If Enable Education finds a complaint to be justified, it will take appropriate measures, including, if necessary, amending its policies and procedures.

For more information, please contact our Privacy Office as follows:

E-mail: [privacy@enableeducation.com](mailto:privacy@enableeducation.com)

Mail: Privacy Officer – 300 Bronte St. S., Unit 1 Milton ON L9T 1Y8

## General

Enable Education reserves the right to modify and amend this privacy policy from time to time in its sole discretion. In such case, the User will be directly notified, and the User will be able to view and accept the modified privacy policy when signing in to the teacher interface.