



Privacy Policy

Last updated April 1, 2021

Lightwell (“We” or “Us”) understands how important your privacy is. This Privacy Policy (“Privacy Policy”) sets out when, how and why we collect, use, disclose, retain and dispose of your Personal Information and Personal Health Information through our website located at www.lightwelltherapy.com (“the Site”). This Privacy Policy applies to all of the products, services, and websites offered by Lightwell through the Site (collectively the “Service”).

The privacy of our clients is of great importance to us. By visiting our Site and/or using the Service in any manner, you acknowledge, accept and consent to the practices and policies outlined in this Privacy Policy. You hereby consent to the collection, use and disclosure of your Personal Information and Personal Health Information in accordance with this Privacy Policy. You may choose not to provide us with Personal Information but by doing so you may not be able to access or use the Service.

This Privacy Policy does not apply to the practices of companies that we do not own or control, whether or not our Site and/or Service depend upon or provide links to them. This Privacy Policy does not apply to such third-party websites, services or technologies, and Lightwell is not responsible for the privacy practices of such third parties. Lightwell encourages you to review the privacy policies of any third parties upon disclosing your personal information to such parties or when visiting such third-party websites.

WHAT’S COVERED IN THIS POLICY?

1. COLLECTION AND USE OF PERSONAL INFORMATION AND OTHER DATA
2. ONLINE TRACKING
3. STORAGE OF INFORMATION & SECURITY
4. DISCLOSURE OF PERSONAL INFORMATION
5. ACCESS, CORRECTION, DELETION AND ACCURACY
6. RETENTION
7. TERMS OF USE
8. CHANGES TO THIS PRIVACY POLICY
9. ADDITIONAL INFORMATION

1. COLLECTION AND USE OF PERSONAL INFORMATION AND OTHER DATA



1.1 Minors

The Site is intended for adults only. Lightwell does not knowingly collect Personal Information from minors. If you are under the age of majority in your state or province please do not use this Site, register on the Site, make any purchases through the Site, or provide any personal information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If Lightwell learns that we have collected or received Personal Information from anyone under the age of majority we will delete that information. If you believe that Lightwell might have any information from or about a minor, please contact us at hello@lightwelltherapy.com

1.2 What Information does Lightwell Collect and Why?

Lightwell collects your personal information in order to provide you with the Service. This may include the following:

Account Information

In order to use the Service, clients are required to have a valid Lightwell Account to log in to the Site ("Account") and gain access to the Service. When you register for the Service, Lightwell collects your name, telephone number and email address ("Account Information"). This information is required to ensure that your Account is private, that the information within it remains confidential as between you and Lightwell and to allow Lightwell to communicate with you. It is your responsibility to ensure that this information remains accurate and up-to-date and to notify Lightwell of any changes.

Your Account will also provide Lightwell with information about your use of the Service such as the Program you purchase, the sections you have worked through, any workbooks or activities you complete through the Program, appointments made and completed, communications between you and a Lightwell therapist, geo-location data and other information available that is combined with your Account Information. Once you create an Account with us and sign in to access the Service, you are not anonymous to us.

Questionnaire

Once you have registered for an Account you will be asked to complete a Questionnaire ("Questionnaire") which will be reviewed by a Lightwell therapist to determine whether our Programs or Services are right for you and how they can best serve your needs. Within the Questionnaire you will be asked to provide Lightwell with Personal Health Information including information about your age, mental health, emotions, activities, employment, medical history, social support system, psychological history and symptoms, prior medical and psychological treatments, hospitalizations, medication use, substance use, other demographic information, country of origin, financial difficulties, race, ethnicity, sexual identity, living arrangement and brief childhood history. This Information will be used solely to assess your suitability for our services and/or to place you into the appropriate Program. The Questionnaire will not be used to diagnose you.

Communications

E: hello@lightwelltherapy.com

T: 647-922-9355



Lightwell collects Personal Information and Personal Health Information you choose to submit to us through your communications with Lightwell. This may include communications via email or if you choose to work with a Lightwell therapist than through the messaging function in the learning platform. The provision of Personal Information and Personal Health information through these means is at your discretion.

Therapy Records

If you are working with a Lightwell therapist, your therapist is required by their College or Regulatory Body to keep a record of your sessions for a period of at least 10 years. Lightwell therefore collects information about your therapy sessions and from your therapy sessions, including communications, in order to comply with these regulations. Lightwell does not record video therapy sessions.

Cookies, IP address and Other Electronic Information

When you access or use the Service, Lightwell may automatically receive and record information on our server logs from your browser, including your IP address, cookies, and the pages you request. IP addresses are automatically reported by your browser each time you view a web page. Your IP address is stored by Lightwell when you register with Lightwell.

1.3 How does Lightwell use your personal information?

Generally, Lightwell uses your Personal Information and Personal Health Information to deliver the Service to you, to improve the delivery of our Service and to develop analytics and aggregated data that allow us to improve our Service and related products and services, or to communicate with you. Specifically, Lightwell uses Personal Information to:

- Authenticate access to your Account and provide access to the Service including the Program and video therapy sessions;
- Operate, maintain, personalize and improve the Service;
- Provide and deliver the Service and features to you including communication and video therapy Services with a Lightwell therapist;
- Communicate with you about the Service, respond to your comments, questions and requests and provide you with customer service and support. You understand and agree that Lightwell may use the Personal Health Information we collect once you have booked an appointment with a Lightwell therapist to support your therapy needs;
- Send technical notices, updates, security alerts and support and administrative messages;
- Process and complete transactions, and send you related information, including confirmations and invoices;
- Investigate and prevent fraudulent transactions, unauthorized access to the Service, and other illegal activities;
- Monitor and analyze usage and activities in connection with the Service and for marketing or business related purposes;



- For other purposes which we will notify you about and seek your consent.

1.4 Analytics

As you visit or browse the Site, we collect information about the device and browser you use, your network connection, your IP address, and information about the cookies installed on your device. This information is logged to help diagnose technical problems for analytics and for quality control purposes.

1.5 Cookies

A cookie is a small amount of data, which includes a unique identifier, sent to your browser from a website and stored on your device. It allows us to uniquely identify you while you are logged into your Account and maintain your Account preferences. Cookies also allow us to authenticate users. By using our Service, you indicate your consent for Lightwell and our affiliates to send cookies to your computer or mobile device in order to uniquely identify your device and improve the quality of our services.

If you prefer, you can turn off cookies in your web browser by changing its security settings. Please note, however, some features of the Service may not function properly if your cookies are disabled. You may be able to set your browser to notify you when you are sent a cookie. This gives you the chance to decide whether or not to accept it. We do not link any of the information we use in cookies to any personally identifiable information submitted by you when you are on the Site.

1.6 Third Parties

Lightwell may work with third party applications in order to provide you with the Service on the Site. These organizations may collect Personal Information from you in order to provide you with these services including your name and contact information, payment information including credit card or banking information, and information about the way you make use of their websites, technology and services. Specifically, the third parties Lightwell works with on the Site are listed below. Please review their privacy policies to ensure that you are comfortable with the way your information will be managed by these third parties:

- Paypal: https://www.paypal.com/ca/webapps/mpp/ua/privacy-full?locale.x=en_CA
- Moodle: <https://moodle.org/admin/tool/policy/view.php?policyid=1>
- Jane Software Inc: <https://jane.app/legal/privacy-policy>
- Hostpapa: <https://www.hostpapa.ca/privacy/>
- Wordpress: <https://en-ca.wordpress.org/about/privacy/>

2. ONLINE TRACKING

At this time, Lightwell does not support Do-Not-Track signals.

Like many internet and mobile services, we may automatically gather certain information about our Service traffic and store it in log files. This information includes mobile device



identifiers, browser type, IP address, mobile or internet service provider, referring/exit pages, operating system, date/time stamp, and clickstream data. The log files include information about user access, login, session duration and behaviour on the platform. We use this information, which does not identify individual users, to analyze trends, to administer the Service, to track users' movements around the Service, and to gather demographic information about our user base. The information also allows us to identify malicious activity or unauthorized access attempts to the platform and database.

We may use third-party tracking services that use log files, cookies, and possibly other techniques to track non-Personal Information about visitors to the Service in the aggregate. These services capture usage and volume statistics as well as geographical location data to compile usage reports and maps for optimization and troubleshooting purposes. In particular, we use [Google Analytics] to help collect and analyze certain information for the purposes discussed in this Privacy Policy. You may opt out of data collection by Google Analytics through <https://tools.google.com/dlpage/gaoptout>.

3. STORAGE OF INFORMATION & SECURITY

3.1 Storage

Lightwell processes and stores data including Personal Information and Personal Health Information, on servers located in Canada. Lightwell also transfers data to the third-party service providers described in Section 1.6. We take steps reasonably necessary to ensure that the data is subject to appropriate safeguards, such as where applicable, relying on contractual commitments from our service providers.

3.2 Security

While using any Internet-based service carries inherent security risks that cannot be 100% prevented, our systems, infrastructure, encryption technology, operation and processes are all designed, built and maintained with your security and privacy in mind. We apply industry standards and best practices to prevent any unauthorized access, use, and disclosure of your Personal Information and Personal Health Information.

4. DISCLOSURE OF PERSONAL INFORMATION

4.1 Your Consent to Share

Lightwell takes your privacy seriously. By providing any Personal Information and Personal Health Information to us, you fully understand that this information may be disclosed to and shared with Lightwell therapists, employees, contractors, agents and third parties as required for the operation of our Service. We require all Lightwell therapists, employees, contractors and agents to comply with this Privacy Policy. By using this Service you unambiguously consent to the disclosure of your Personal Information and Personal Health Information as described in this Privacy Policy. We do not share your Personal Information with anyone except as required by law or as follows:



- **Lightwell Therapists:** Lightwell will disclose your Personal Information and Personal Health Information to its therapists in order to provide you with the Service. Specifically, the Personal Health Information included in your Questionnaire will be provided to a Lightwell Therapist for review. If you choose to work with a Lightwell Therapist they will also have access to the Personal Health Information you provide to them. Lightwell requires that all of its therapists adhere to the confidentiality practices required by their designated College or Regulatory Body. These Colleges and Regulatory Bodies require that their members (the therapist) share your confidential and private information under limited circumstances including the following:
 - If requested by an Order of the Court or Subpoena;
 - If the therapist believes you are at risk of harming yourself or someone else;
 - If your therapist suspects that a child or an elder is at risk of abuse or harm;
 - To facilitate an investigation authorized by warrant or law;
 - If you have made a complaint about your therapist, to your therapist's college and regulatory proceedings have been commenced;
 - To contact a relative or friend in the event of an emergency;
- **Financial Transactions:** Lightwell may disclose your Personal Information to relevant third parties for the purposes of processing your transactions as described in the Terms of Use.
- **Third Parties, Business Partners and Consultants:** We may from time to time employ third parties to perform tasks on our behalf and we may need to share Account Information and other Personal Information with them to provide certain services. Unless we tell you differently, such third parties do not have any right to use the Personal Information we share with them beyond what is necessary for them to provide the tasks and services on our behalf. The third parties we currently engage includes third party companies and individuals hired by us to facilitate our services, including the provision of maintenance services, hosting services, database management, delivery of the Program and management of files and messaging, video services, web analytics, payment processing, email and content marketing services, sales productivity services, security services and general improvement of the Service.

By submitting Personal Information or otherwise using the Service, you agree to this transfer, storing or processing of your Personal Information in accordance with this Privacy Policy.

4.2 Compliance with Laws and Law Enforcement

We cooperate with government and law enforcement officials to enforce and comply with the law. We may disclose information necessary or appropriate to protect the safety of the public or any person, to respond to claims and legal processes (including but not limited to subpoenas), and to prevent or stop activity that may be illegal or dangerous. You should also be aware that therapists may be obliged to disclose information to law enforcement or other authorities to conform to their professional and legal responsibilities.

4.3 Business Transfers



If our business (or substantially all of our assets) are acquired by a third party, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information may be made available or otherwise transferred to the new controlling entity, where permitted under applicable law.

4.4 With Your Consent

If we need to use or disclose any Personal Information in a way not identified in this Privacy Policy, we will notify you and/or obtain consent as required under applicable privacy laws.

5. RETENTION

Lightwell will retain your Personal Information and Personal Health Information related to a Program you are working on for a period of six (6) months or as required by law or your therapist's College or Regulatory body which may extend beyond the termination of our relationship with you. Lightwell will dispose of your Personal Information once your Account is closed. However, all therapists are required to retain their client's records for a minimum of 10 years. Therefore, Lightwell will retain all records of clients working with a Lightwell Therapist for the time required by their therapist's regulatory body.

We may also retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. Unless otherwise set forth in the Terms or a separate agreement with you governing the applicable Service, if you cease using such Service, we may retain or destroy, at our discretion, all Personal Information and non-personally identifiable information we collect through your use of such Service. All retained Personal Information will remain subject to the terms of this Privacy Policy.

6. ACCESS, CORRECTION, DELETION AND ACCURACY

You have the right to request access to the Personal Information we hold about you in order to verify the Personal Information we have collected in respect to you and to have a general account of our uses of that information. Following receipt of your written request, we will provide you with a copy of your Personal Information, although in certain circumstances, and as permitted under law, we may not be able to make all relevant information available to you. In such circumstances we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner.

We will make every reasonable effort to keep your Personal Information accurate and up to date, and we will provide you with mechanisms to update, correct, delete or add to your Personal Information as appropriate. As appropriate, this amended Personal Information will be transmitted to those parties to which we are permitted to disclose your information. Having accurate Personal Information about you enables us to give you the best possible service.

You also have the right to request that we delete your Account. We will make every reasonable effort to review your request and delete your Account in a timely manner. However, please note that we must comply with the rules of each therapist's respective



College and retain all relevant client therapy records for a period of at least 10 years or as required by each College. Therefore, while we can delete your account, we will not be permitted by law to delete your therapy records.

We have designated a Privacy Officer to ensure that your Personal Information and Personal Health Information is adequately protected. For any questions or concerns related to your Personal Information in our possession, please contact Dr. Kate Peplinskie or Ms. Katherine Hollerer at hello@lightwelltherapy.com

7. TERMS OF USE

Please also visit our applicable Terms of Use, which establish the use, disclaimers, and limitations of liability governing the use of our Services.

8. CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time. If we decide to change our Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date at the top of this page. Use of Personal Information we collect is subject to the Privacy Policy in effect at the time such information is collected, used or disclosed. If we make material changes or changes in the way we use Personal Information, we will notify you by posting an announcement on our Site or by sending you an email prior to the change becoming effective. You are bound by any changes to the Privacy Policy when you use the Site, or Service after such changes have been first posted.

9. ADDITIONAL INFORMATION

If you have questions regarding our Privacy Policy, its implementation, failure to adhere to this Privacy Policy and/or our general practices, please contact us: hello@lightwelltherapy.com.

