

## Privacy Policy

*(The Privacy Policy posted on this Platform was updated on January 25, 2021)*

### Introduction

LifeCourseOnline is a web application and secure online platform that enables individuals with disabilities, family members, friends, support agencies, support workers, health care providers, and administrators the ability to share information that helps facilitate person directed planning and follow up on how plans unfold ("LifeCourseOnline" or the "Platform"). The Platform is located at <https://app.lifecourseonline.com/>, and includes all connected websites.

LifeCourseOnline is owned and operated by Sonderbloom Inc. ("the Company", "we" or "us").

We take privacy seriously and will take reasonable steps to protect this information in accordance with applicable laws.

**LifeCourseOnline facilitates the collection, use, and disclosure of the personal information (including health information) of individuals with disabilities by those individuals or by a support agency that is providing LifeCourseOnline to the individual (the "Support Agency"). Individuals and Support Agencies, as the case may be, are responsible for protecting such information in accordance with their own privacy policies and applicable laws. You can generally find out about the privacy practices of a Support Agency by contacting them or by accessing their website. *LifeCourseOnline is not responsible for the privacy practices of Support Agencies.***

### **INDIVIDUAL/GUARDIAN CONSENT TO DISCLOSURE OF PERSONAL HEALTH**

**INFORMATION:** All Users represent and warrant that they have consented (or, as applicable, their parent or legal guardian has consented) electronically to the release of information facilitated by the Company or Support Agency prior to accessing LifeCourseOnline. Such consent is to include the release of any Health Information that may be recorded in LifeCourseOnline.

By proceeding to access and use the Platform, you hereby consent to the collection, use, and disclosure of all personal information (including health information, if applicable) that you have uploaded to the Platform or that you have authorized others to upload to

the Platform on your behalf. Such information will be disclosed to your designated Support Administrators, Support Workers, Family/Friend. Only those Support Administrators, Support Workers, Family/Friends and/or your legal guardian who have given consent to release information will be able to share information through LifeCourseOnline. You hereby authorize the Company to facilitate the disclosure of your personal information (including health information) on LifeCourseOnline in accordance with the permission levels set by you for anyone you invite to your account.

This Privacy Policy (the “Policy”) sets out how we use, protect, collect and preserve information submitted by Users. Any capitalized terms not defined in the Policy have the same meaning as defined in the Terms of Use and should be read in conjunction with the Policy.

You are prohibited from using the Platform unless you fully understand and agree to the Terms of Use and the Policy.

If you have any questions about the Terms of Use or the Policy, please contact us by sending an email with your questions to [support@lifecourseonline.com](mailto:support@lifecourseonline.com) before accessing or entering any information on the Platform.

Contents:

1. Identifying Information About Users We Collect and Store
2. Privacy Practices
3. Collection of Personal Information
4. Obligations of Users
5. Additional Data Collected by LifeCourseOnline
6. Deleting Your Information
7. Keeping Your Information Secure
8. Security Breaches
9. Using Third-Party Applications
10. LifeCourseOnline and Children
11. Contact Us

## **1. Identifying Information About Users We Collect and Store**

When i) an Individual; ii) a Support Administrator with consent from and on behalf of an Individual; or iii) a Family/Friend, Government Funder, Support Worker or Support

Administrator choose to create a Profile with LifeCourseOnline and use the Platform, we will collect and retain all identifying information about the User submitted to us for the purposes of creating a profile. We collect and retain this information for the purposes of administering LifeCourseOnline and facilitating the exchange of information by Users (including Support Agencies).

Identifying information may include but is not necessarily limited to:

- Name;
- Email address;
- Telephone number;
- Mailing address;
- Gender;
- Age

We will not use this identifying information to contact you for any reason unrelated to your use of the Platform. Except with your consent or where required or permitted by law, we will not provide your identifying information to any third-party.

We will not use your identifying information for commercial reasons unrelated to LifeCourseOnline.

The following third party service providers, provide the following services in relation to LifeCourseOnline:

- University of Missouri Kansas City Institute for Human Development gathers anonymized data for research purposes
- Team members selected by you with whom you have instructed us to share your data

Confidentiality agreements are in place with these service providers in order to protect personal information within LifeCourseOnline. LifeCourseOnline users, employees, and other service providers are required to sign appropriate confidentiality pledges and are provided with regular training and reminders relating to confidentiality.

## **2. Privacy Practices**

LifeCourseOnline has implemented a privacy compliance program to reflect the privacy principles outlined in this policy including to put appropriate safeguards in place for personal information and personal health information. The program is regularly reviewed and includes, among other things, appropriate policies, procedures, contractual requirements and training for staff and service providers, and an incident response plan.

## **3. Collection of Personal Health Information**

In order to facilitate their interactions with other Users, Individuals and other authorized Users are able to upload personal information (including personal health information) to the Platform.

Subject to Support Administrators and Support Workers' own legal and professional obligations, Support Administrators and Support Workers' may periodically disclose the Individual's personal information (including health information) to others to facilitate the process of providing health care services to Individuals. Such disclosure will not always be made through the Platform and may include disclosure of Health Information directly to and from other Support Administrators, Support Workers' and other health care professionals.

## **4. Obligations of Users**

Support Administrators and Support Workers acknowledge that any disclosure of personal Health Information obtained via the Platform shall be conducted pursuant to their own legal and professional obligations, including in Ontario, the Personal Health Information Protection Act, 2004, S.O. 2004, c. 3 Sched A, the Personal Information Protection and Electronic Documents Act (*Canada*) ("PIPEDA"), California Online Privacy Protection Act (CalOPPA, or the Privacy Act of 1988 in Australia as the case may be, and their respective regulations, as they may be amended from time to time, and any successor legislation.

All Users (including Support Agencies) are required to conduct themselves in compliance with any and all applicable privacy laws.

We do not manage or cannot control how Users will treat the personal information and Health Information provided to them through LifeCourseOnline. **We are not responsible for the privacy practices of Users.**

## **5. Additional Data Collected by LifeCourseOnline**

To learn about your user experience and to make periodic improvements to the Platform and our Service, we collect and retain technical non-identifiable information routinely collected by web browsers and mobile devices. We will automatically record information about your activity on the Platform. This may include your Internet Protocol address, browser type, the web pages visited before and after you came to the Platform, locale preferences, identification numbers associated with your computer or mobile devices, your mobile carrier, date and time stamps associated with transactions, system configuration information, metadata, and other interactions with LifeCourseOnline, our Platform and Service.

We use “cookies” to collect information and improve the Platform. A cookie is a small data file that we transfer to your computer or mobile device. We may use “persistent cookies” to save your user ID and login password for future logins to the Platform. We may use “session ID cookies” to enable certain features of the Platform, to better understand how you interact with the Platform and to monitor aggregate usage and web traffic routing on the Platform. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the Platforms you visit. If you do not accept cookies, however, you may not be able to use all aspects of our Platform.

We may use the data collected from “cookies” and web browsers for its own purposes, both related to and unrelated to improving the Platform and other services. In the event we disclose this data to any third-party for any purposes, it will be used anonymously and stripped of any and all personal or identifying information. We will not under any circumstances collect personal health information in “cookies”.

## **6. Deleting Your Information**

If you want us to permanently delete your information from our servers at any time, be it identifying information or personal health information, please send an email to

support@lifecourseonline.com. We will ensure your information is deleted in a reasonable time after receiving that request. Deleting such information may require us to terminate your account in its entirety.

So long as your account remains active, we will preserve your information in accordance with the Policy.

When deleting your information, whether by request or due to inactivity, we will use standard electronic means to remove your personal information from our files, including known backups containing personal information.

We will also retain any and all information that we are required to retain under any applicable laws for the full duration of time required under those laws.

## **7. Keeping Your Information Secure**

We will store your information only in electronic format on industry-standard servers that we have selected. Our servers are located in California, and thus are subject to applicable California privacy laws. Except where required to do so by law, we will not store your personal information in any physical or paper-based format.

The servers we select to store information engage security software and generally accepted standards to protect personal information. The software used by these servers is intended to prevent unauthorized access or improper use. However, no security system is perfect and there is always a risk of unauthorized parties accessing your personal information. Therefore, we cannot guarantee the complete protection and security of your personal information.

Further information on the servers employed by LifeCourseOnline will be made available to Users upon request to the extent necessary to ensure Users are fulfilling their statutory, legal and professional privacy obligations. We make no guarantees or representations as to the technical or legal compliance of its servers.

## **8. Security Breaches**

In the event User information is disclosed as the result of any breach of security of the Platform or its servers, regardless of who is at fault, we will take steps to advise all known affected Users within one week of learning of the breach and comply with applicable privacy laws with respect to the breach.

All Users are required to notify us immediately of any suspected or actual security or privacy breach (including, for example, any loss of information or any access to the Platform by someone who is not an authorized User).

## **9. Changes to this Privacy Policy**

From time to time, we may update this Privacy Policy. We will notify you about material changes by either sending an email message to the email address you most recently provided to us or by prominently posting a notice on the Platform. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and with whom we share it.

## **10. LifeCourseOnline and Children**

The services offered on the Platform are not intended to be accessed by children without parental/guardian consent. The Platform should not be used in the process of providing health care services to children without parental/guardian consent.

We take special precautions to protect the information of persons under the age of 18 (including to require such persons to have parental/guardian consent before using the Platform). In the event any information is submitted by a person under the age of 18 without parental/guardian consent, we will delete that information immediately upon being advised of that person's true age.

## **11. Do Not Track Requests**

Note that your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, the Platform \currently does not alter its practices when it

receives a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track” you may wish to visit <http://www.allaboutdnt.com>.

## **12. Contact Us**

We encourage you to send us questions and inquiries on the Policy and the steps we take to keep your information secure. Please send us an email: [support@lifecourseonline.com](mailto:support@lifecourseonline.com). We will respond to all inquiries on the Policy within 30 days.