

# Privacy Policy

FutureFit AI Privacy Policy

Updated: Feb 4, 2022

Your privacy is important to us. It is FutureFit AI's policy to respect your privacy regarding any information we may collect from you across our website, <https://www.futurefit.ai/> (the “**Site**”), as well as through the offering of our the FutureFit AI software platform and related career GPS services (the “**Services**”), and any available related mobile applications (the “**App**”).

This Privacy Policy covers our collection, use and disclosure of information about identifiable individuals and information which can be used to identify an individual (“**Personal Information**”). This Privacy Policy does not apply to the practices of companies that we do not own or control, including the privacy practices of our customers (“**Customers**”), on whose behalf we may store data. Our customers are solely responsible for ensuring that they have obtained the necessary authorizations and consents for any Personal Information made available to FutureFit AI.

## 1. Information we collect

### *Log data*

When you visit our Site or use the App or Services, our servers may automatically log the standard data provided by your web browser. It may include your computer’s Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, and other details. We use this information to improve the efficiency of the Services, optimize the Services, measure user metrics and maintain security.

### *Personal information*

We need to use Personal Data in the course of providing the Services to you and your organization and for ancillary purposes set out in this Privacy Policy. When you register for an account as a user (“**Account**”), we may collect the following Personal Information (which will depend on your organization and use case):

- Name
- Email
- Location
- Preferred Pronouns
- Age
- Birthday
- Social media profiles

- Phone number(s)
- Address(es)
- Preferred Language
- Demographics Information (Community Group(s); Career Stage; Education Level; Income)
- Work and Learning Experience (Education History; Work Experience History; Workplace Interests; Workplaces Preferences; Career Preference; Skills)
- Career Confidence, Career Satisfaction
- Website address
- Profile photo
- Demographic data such as status related to ethnicity, sex, and disability (if applicable)

When a User meets with a coach through the Services, the user may be asked to provide additional information related to the user's personal history, employment status, and career goals. This Personal Information is collected by the coach and stored in within the Services so that the coach can provide tailored career advice.

If you create an Account for your organization or are a prospective business partner or customer, we may collect the following Personal Information to solicit and provide the Services:

- First name, last name
- Email
- Phone number
- Country
- Title
- Organization Name
- Other information about your organization

### *Business data*

Business data refers to data that accumulates over the normal course of operation on our platform and is related to user's Account. This may include transaction records, stored files, user profiles, analytics data and other metrics, as well as other types of information, created or generated, as users interact with our Services. This data may be anonymized and aggregated and then used by FutureFit AI for improving the Services.

## **2. Legal bases for processing**

We will process your personal information lawfully, fairly and in a transparent manner. We collect and process information about you only where we have legal bases for doing so.

These legal bases depend on the services you use and how you use them, meaning we collect and use your information only where:

- it's necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract (for example, when we provide a service you request from us);
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services, and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose (for example, you might consent to us sending you our newsletter);
- or we need to process your data to comply with a legal obligation.

Where you consent to our use of information about you for a specific purpose, you have the right to change your mind at any time (but this will not affect any processing that has already taken place).

We don't keep Personal Information for longer than is necessary. While we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use or modification. That said, we advise that no method of electronic transmission or storage is 100% secure and cannot guarantee absolute data security. If necessary, we may retain your personal information for our compliance with a legal obligation or in order to protect your vital interests or the vital interests of another natural person.

### **3. Collection and use of information**

We may collect, hold, use and disclose Personal Information for the following purposes and personal information will not be further processed in a manner that is incompatible with these purposes:

- to provide you with our App and Services' core features;
- to enable you to access and use our Site, associated applications and associated social media platforms;
- to contact and communicate with you;
- for internal record keeping and administrative purposes;
- to create analytics based on aggregated and anonymized information, market research and business development, including to operate and improve our website, associated applications and associated social media platforms; and
- to comply with our legal obligations and resolve any disputes that we may have.

### **4. Disclosure of Personal Information to third parties**

**Service Providers.** We use third party technology providers to provide certain aspects of the Services and host our Services. Accordingly, we may disclose Personal Information to: third

party service providers for the purpose of enabling them to provide their services, including IT service providers, data storage, hosting and server providers, analytics, error loggers, maintenance or problem-solving providers, professional advisors and payment systems operators; and third parties to collect and process data. A list of our current sub-processors is available at the end of the policy.

**As Required by Law.** We may disclose your Personal Information to third parties without your consent if we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. Further, we may disclose Personal Information when we believe in good faith that such disclosure is required by and in accordance with the law.

We also reserve the right to access, read, preserve, and disclose any information as we reasonably believe is necessary to:

- satisfy any applicable law, regulation, legal process or governmental request; enforce our contracts or user agreement, including investigation of potential violations hereof; and
- detect, prevent, or otherwise address fraud, security or technical issues.

The above may include exchanging information with other companies and organizations for fraud protection, spam/malware prevention, and other cyber security related. Notwithstanding the general terms of this policy, the collection, use, and disclosure of Personal Information may be made outside of the terms herein to the extent provided for in any applicable privacy or other legislation in effect from time to time, or pursuant to court orders.

## **5. International transfers of personal information**

The Personal Information we collect is stored and processed in the United States and Canada (unless we have an agreement with your organization to store data elsewhere), or where we or our partners, affiliates and third-party providers maintain facilities. By providing us with your personal information, you consent to the disclosure to these overseas third parties.

We will ensure that any transfer of Personal Information from countries in the European Economic Area (EEA) to countries outside the EEA will be protected by appropriate safeguards, for example by using standard data protection clauses approved by the European Commission, or the use of binding corporate rules or other legally accepted means.

Where we transfer Personal Information from a non-EEA country to another country, you acknowledge that third parties in other jurisdictions may not be subject to similar data protection laws to the ones in our jurisdiction. There are risks if any such third party engages in any act or

practice that would contravene the data privacy laws in our jurisdiction and this might mean that you will not be able to seek redress under our jurisdiction's privacy laws.

## 6. Your rights and controlling your personal information

**Choice and consent:** By providing Personal Information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this Privacy Policy. If you are under 16 years of age, you must have, and warrant to the extent permitted by law to us, that you have your parent or legal guardian's permission to access and use the website and they (your parents or guardian) have consented to you providing us with your personal information. You do not have to provide personal information to us, however, if you do not, it may affect your use of this website or the products and/or services offered on or through it.

**Information from third parties:** If we receive Personal Information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Restrict:** You may choose to restrict the collection or use of your Personal Information. If you have previously agreed to us using your Personal Information for direct marketing purposes, you may change your mind at any time by contacting us using the details below. If you ask us to restrict or limit how we process your personal information, we will let you know how the restriction affects your use of our website or products and services.

**Access and data portability:** You may request details of the personal information that we hold about you. You may request a copy of the personal information we hold about you. Where possible, we will provide this information in CSV format or other easily readable machine format. You may request that we erase the Personal Information we hold about you at any time. You may also request that we transfer this Personal Information to another third party.

**Correction:** If you believe that any Personal Information, we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

**Notification of data breaches:** We will comply with laws applicable to us in respect of any data breach, including notifying of you of a breach where required under applicable law.

**Complaints:** If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your

complaint. You also have the right to contact a regulatory body or data protection authority in relation to your complaint.

**Unsubscribe:** To unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Note that we may not be able to provide access to Personal Information that we store on behalf of our Customers. If you require access or correction of Personal Information collected by our Customers, you will need to contact the applicable organization directly.

**Customers:** We will disclose aggregated user data to the customer organization providing you access to our Services. Customers may use the aggregated data for analysis and planning purposes.

## 7. Cookies

Futurefit AI and our third-party partners may collect certain types of usage information when you visit our Site or otherwise engage with us through cookies—for example, through analytics providers and content partners. We grant these third parties access to selected information to perform specific tasks on our behalf. They may also set third-party cookies in order to deliver the services they are providing. Cookies can be used to track you on other websites that use the same third-party service. As we have no control over third-party cookies, they are not covered by our cookie policy. For a list of our current sub-processors, please visit our Sub-Processors.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the Site, as some features and services on our Site may not work properly. By consenting to this policy, you consent to the use of cookies on our Site.

## 8. Retention

We will keep your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. Any Personal Information that we stored on behalf of our Customers will be retained in accordance with our customer agreement.

We may 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, or if required by law. All retained Personal Information will remain subject to the terms of this Privacy Policy.

If your Account is linked to an organization, your organization may store your employment information for longer periods in accordance with its own retention policies, including after your employment terminates.

## **9. Business transfers**

If we or our assets are acquired, or in the unlikely event that we go out of business or enter bankruptcy, we would include data among the assets transferred to any parties who acquire us. You acknowledge that such transfers may occur, and that any parties who acquire us may continue to use your personal information according to this policy.

## **10. Limits of our policy**

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

## **11. California privacy rights**

This section provides additional details about the Personal Information we collect about California consumers and the rights afforded to them under the *California Consumer Privacy Act* (the CCPA), to the extent the CCPA is applicable to FutureFit AI.

We collect Personal Information for commercial purposes described above. FutureFit AI does not sell (as that term is defined in the CCPA) the Personal Information we collect.

Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of Personal Information we collect (including how we use and disclose this Personal Information), to delete their Personal Information, to opt out of any “sales” of Personal Information that may be occurring, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at the contact information below. We will verify your request using the information associated with your Account, if available, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

## **12. Changes to this policy**

At our discretion, we may change our privacy policy to reflect current acceptable practices. We will take reasonable steps to let users know about changes via our Site. Your continued use of this Services (including the Site or App) after any changes to this policy will be regarded as acceptance of our practices around privacy and personal information.

If we make a significant change to this Privacy Policy, for example changing a lawful basis on which we process your Personal Information, we will ask you to re-consent to the amended privacy policy.

FutureFit AI Data Controller  
FutureFit AI  
366 Adelaide Street West, Toronto, ON, M5V 1R9

[help@futurefit.ai](mailto:help@futurefit.ai)

This policy is effective as of February 4, 2022.

### **SUB-PROCESSORS**

To support FutureFit AI in delivering the Services, FutureFit AI engages third-party service providers as sub-processors.

This page identifies our sub-processors, describes where they are located, lists what services they provide to us and identifies the type of personal information processed.

Our business needs may change from time to time and FutureFit AI will periodically update this page to provide notice of additions and removals to our list of sub-processors.

\*The Sub-Processor may not be used in every deployment. Please contact your organization for more information.

<b>Service Provider</b>	<b>Types of Personal Information processed</b>	<b>Processor Activities</b>	<b>Location</b>
Amazon Web Services	IP, Name, Email, and all other fields in Section 1 (if applicable)	Cloud-hosting	USA
Intercom*	Name, Email, Chat history (through chat integration)	Messenger, Email, Operator, Posts, and Product Tour	United States, Ireland, United Kingdom, Australia

Typeform*	Name, Email	Forms; User Feedback	Spain
Zoom*	Name, Email	Video Calls	USA
Calendly*	Name, Email, Website Form	Call Scheduling	USA
Google Suite*	Name, Email	Email, Forms, Documents, and Sheets	USA
Hubspot*	Name, Email, Website Form	Email marketing; CRM	USA
Wordpress (Ninja Form plug-in)*	Name, Email, Website Form	Marketing, Sales	USA
Heap	IP, Email, Usage	Product Analytics	USA
Hotjar	IP, Email, Usage	Product Analytics	USA

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