



Privacy Policy

ENGLISH ONLINE INC.

Last updated: August 1, 2025

English Online Inc. (“EO”) is committed to protecting the confidentiality of personal information in its custody or under its control. The purpose of this Privacy Policy is to ensure that everyone’s personal information is protected in accordance with the relevant privacy laws and to ensure that all of EO practices and procedures are compliant in that regard.

By visiting EO website (the “**Website**”), submitting information to EO or interacting with EO, all users agree to the collection, use and disclosure of your Personal Information, as set out in this Privacy Policy, as updated from time to time. Accordingly, all users should review this Privacy Policy from time to time to keep informed of any such amendments. The most recent date of revision will be indicated prominently at the top of the Privacy Policy.

Personal Information is any information about a user as an identifiable individual, such as their name, address, telephone number and email address. EO may also collect non-personal information, being information that cannot be associated with an identifiable individual, such as aggregated statistical information (e.g. the average length of time users spend visiting our Website), or other anonymous information, such as the type and version of browser being used to access the Website.

1. **Accountability**

We are responsible for personal information in our possession or under our control.

Our appointed Privacy Officer is responsible for compliance with the provisions of the Privacy Policy. Our Privacy Officer may be contacted by using the contact information at the end of this Policy. Other individuals within our organization may be delegated to act on behalf of our Privacy Officer or to take responsibility for the day-to-day collection and processing of personal information.

2. **Identifying the Purposes for the Collection of Personal Information**

EO identifies the purposes for which personal information is collected.

EO will collect personal information for the following purposes:

- to establish and maintain responsible relations with our users, including communications;
- to operate and provide our ongoing services to users;
- to understand and meet user needs and preferences;
- to study and research matters related to our services;
- to manage, monitor, regulate and protect our services and operations;
- to contact, deal with and secure funding from government and other funders;
- to meet legal and regulatory requirements.

Unless permitted or required by law, EO shall not use or disclose your personal information for any new purpose without first identifying and documenting the new purpose and obtaining users' consent.

3. Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual are required for the collection, use or disclosure of personal information, except where inappropriate or otherwise permitted by law.

User knowledge and consent are generally required for the collection, use, or disclosure of personal information, except where inappropriate or otherwise permitted by law. In certain select circumstances, as provided under applicable privacy law, personal information can be collected, used or disclosed without the knowledge and consent of the individual.

EO may also collect, use, or disclose personal information without user knowledge or consent if seeking consent might defeat the purpose of collecting the information; such as in the investigation of a breach of an agreement or duty, a contravention of a federal or provincial or other law, or where the life, health or security of an individual is threatened.

EO may also collect, use, or disclose personal information without user knowledge or consent to a lawyer representing EO in proceedings such as to comply with a subpoena, warrant or other court order, or as may be required or authorized by law.

Generally, EO will seek consent to use and disclose personal information at the same time as or before EO collects the information. However, EO may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.

4. Limiting the Collection of Personal Information

EO will limit the collection of personal information to that which is necessary for the purposes that EO has identified. EO will collect personal information by fair and lawful means.

EO limits the information it collects to that which is necessary for use of the Website and to deliver a high level of service.

EO generally collects personal information directly from its users, but EO may also collect personal information from other sources, including government agencies or registries, user agents or representatives, third parties engaged to provide EO with information related to the services EO is providing, or other third parties that represent that they have the right to disclose personal information about a user.

EO may collect some or all of the following personal information when an eligible user accesses its Website or interacts with EO:

- Name, address and telephone number;
- Email address and facsimile number;
- Key personnel information, including all contact information of those persons;
- User needs and preference information;
- Research based information gathered from users in the course of the services EO provides;
- Third party agent or representative information including reports or data prepared or gathered about each user required by EO for provision of its services;
- Government or registry data about a user required by EO for provision of its services or products.

5. Limiting Use, Disclosure and Retention of Personal Information

EO will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. EO will retain personal information only as long as necessary for the fulfillment of the purposes for which it was collected.

EO will retain user personal information for the purposes for which the information was collected and shall maintain such information as EO may be required to do so for that purpose or for which EO may be required by law.

EO will maintain reasonable and systemic controls and practices to apply to personal information that is no longer necessary or relevant in order to identify it and securely destroy it or otherwise render it unintelligible.

EO may disclose user's personal information to:

- A third party that is involved in supplying EO with products or services related to the services that EO is providing to users;
- A third party that EO has engaged to perform functions on EO behalf, such as delivery services, record keeping or storage services, professional services such as financial, legal, or other similar professional services;
- A person who in EO reasonable judgment is seeking the information as user agent, contractor or advisor, such as user financial, legal or other professional advisor;
- A public authority or agent of a public authority as may be required or permitted by law;
- With appropriate contractual safeguards, to a third party as part of a contemplated or actual transaction involving EO such as a merger or acquisition, which would necessitate the transfer of personal information to the prospective or actual acquirer, or their authorized representatives, involved in the transaction or contemplated transaction.

Note that personal information may be stored or processed in the cloud or outside of Canada, where it will be subject to the legal regime of the destination country. For access to written information about EO's policies and practices with respect to service providers outside of Canada, please contact EO's Privacy Officer, at the address provided below.

6. Accuracy of Personal Information

User personal information shall be accurate, complete and up to date as is necessary for the purposes for which it is to be used.

EO relies primarily on data users provide to it directly. In EO's efforts to maintain the accuracy of user personal information, EO asks that users contact EO with any changes in their personal information that may occur over the course of user relationship with EO.

If users have concerns about the accuracy of the personal information EO retains, please contact EO's Privacy Officer.

7. Security Safeguards

EO will protect user personal information by security safeguards appropriate to the sensitivity of the information.

EO will use appropriate security measures to protect personal information against the risks of loss or theft, unauthorized access, disclosure, use, copying or modification. Methods of protection will include physical, organizational and technological measures.

Where user personal information is shared with third parties, as contemplated in this Privacy Policy, EO will protect user personal information by contractual agreements or other means stipulating the confidentiality of the information and the purposes for which it is being used.

8. Openness Concerning Practices and Policies

This Privacy Policy shall always be readily available to users or others who request a copy.

If anyone would like a copy of this Policy, please contact EO's Privacy Officer.

9. User Access to Personal Information

EO will inform all users of the existence, use and disclosure of their personal information upon request, and will give them access to such information where required. Users have the right to challenge the accuracy and completeness of the personal information and request to have it amended as appropriate.

Upon written request, EO will inform users of the existence, use and disclosure of their personal information. Personal information will be provided in a reasonable period of time and, if necessary, at an appropriately reasonable cost.

In certain situations, EO may not be able to provide access to all the personal information that EO holds about its users. For example, EO may not reveal information that would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, EO may not provide access to information if disclosure would reveal confidential commercial information of EO, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or duty or a contravention of a federal, provincial or other law. If access to personal information cannot be provided, EO shall provide the reasons for denying access upon request.

10. Challenging Compliance

Users have the right to address a challenge concerning compliance with the above principles to EO's Privacy Officer.

EO wishes to ensure that its Privacy Policy meets users' concerns and responds to users' needs. If any user would like to discuss their personal information, EO's Privacy Officer is available to receive user enquiries, comments or complaints.

EO's Privacy Officer is Irina Volchok and may be contacted at:

English Online Inc.

610-294 Portage Avenue

Winnipeg, MB R3C 0B9

Telephone: 204-946-5140

Email: ivolchok@english-online.ca