

Relationship-Makeover.com Privacy Policy

Relationship-Makeover.com (the "Web Site") is owned and operated by *IMAGE Inc.* based in Alberta, Canada.

We recognize the importance of protecting your privacy and personal information, in particular your personal health information and consulting and counseling case history.

Effective Date: August 4, 2009

Personal Information: Personal information is information that is about an identifiable individual, which therefore includes any information about you that can be used to identify or contact you, including, for example, your name, contact information such as residential or mailing address, telephone number, email address, personal health information, consulting case history, and any other information about you as an individual. Personal information does not include aggregate, statistical or anonymous information that cannot be used to identify you or be linked to you.

Policy: This Privacy Policy ("Policy") describes our privacy and personal information practices, including the information we collect about you, how we use it, what parties will have access to it and under what circumstances, how it is retained, your choices about how your personal information is used, and how you may communicate with us for further information. If you choose to become a client of this Web Site, you will be required to agree that your personal information may be collected, used and disclosed as set out in this Policy or in any specific consents granted by you.

Confidentiality: Except as stated in this Policy, any personal information you provide to us is collected, used and retained on a completely confidential basis.

Unless this Policy states otherwise, no other party, including other clients, will have access to your personal information unless you consent.

We will have record of your credit card information as you will remain on our site to finalize your purchase. We keep only enough to complete your purchase and to ensure that you receive the services you paid for. We use ViaKlix and Nova Networks based in Atlanta, GA, USA to finalize your credit card purchases.

Consent: Subject to this Policy and any applicable legislation, we will identify the purposes for collection, use and disclosure of your personal information, and we will notify you of those purposes at or before the time of collection. In the event that you have any questions about the collection of your personal information, you may always contact Norman Quantz or Neva Quantz by clicking here: <http://www.relationship-makeover.com/contactform.php> or by calling 1-877-335-8376

Also, subject to this Policy and any applicable legislation, if we wish to use or disclose your information for a purpose other than that to which you have consented, we will contact you to obtain your further consent before doing so.

Your consent may be indicated in a number of ways, including orally (for example, if over the telephone), or by mail or fax, or by use of a computer, including by email, or by clicking with your mouse, or by clicking or checking off a check box, hitting "enter" on your keyboard, and so on. In addition, your consent may be implied or deemed, such as where you voluntarily provide us with information for a particular purpose, and it is reasonable that you would voluntarily do so, in which case we will consider that we have your consent to collection, use or disclosure of your information for that purpose.

It is our policy to only collect information about you with your consent and on a voluntary basis. You may withdraw your consent at any time, subject to reasonable notice and legal or contractual obligations. To withdraw your consent, simply complete and submit the [Withdrawal of Consent for Consulting](#) or the [Seminar Transfer-Cancellation](#) or any of the Opt-Out links at the bottom of each Support Program. Completing and submitting either of these forms will end your receiving those services as they cannot be provided without personal information. Withdrawing your consent does not guarantee a full or pro-rated refund, or any refund at all, nor does it obligate us, in any way, to the further completion of any of the Phases or programs. If there are other consequences to your withdrawal of consent, we will advise you of those at the time of your withdrawal. We do reserve the right to retain your information for as long as is necessary for reasonable legal or business purposes as permitted by applicable law (see Retention of Information below).

Parental Consent: Clients under the age of majority in their jurisdiction wishing to subscribe to our services must have parental consent to do so. We will contact a parent or guardian designated by you to verify identity and parental consent by telephone, following which we will generally require a web cam conference and execution of a consent form with the parent or guardian.

Collection, Use and Disclosure: If you choose to register with us as a client, you will be asked to provide us with personal information, including first and last name, address, city, province or state, postal code, residential and cell phone numbers, email address, web page (if any), age group, gender and marital status. This information is used and disclosed for the purposes of enrolling and registering you as a user of this Web Site and processing your payment for our services, and also as background information for use by your Professional Relationship Counselor. During the course of receiving services from us, you may provide further personal information with your consent for use by your Professional Relationship Counselor in providing those services.

All other personal information, including any journaling and other communications that you submit to us, is used for providing our services to you, and specifically is used by you and your Professional Relationship Counselor, as well as their supervisor and Norman Quantz and Neva Quantz (owners of I.M.A.G.E. Inc.) (which are the only "Authorized Persons" permitted to access your personal information other than billing information described above) for the purposes of delivering services, monitoring, assessing and gauging your understanding and integration of the material provided, tracking your progress through our program, and activities related to those purposes.

We use your email address to communicate with you, including to respond to e-mail from you and to inform you of significant changes to this Policy. Should you choose to sign up for our supporting programs such as our newsletter, *Tip of the Week*, or our other informational services, *Relationship Venture* or *Venture Coaching*, you will receive emails providing the product or service that you indicated was of interest to you. You can always opt out or unsubscribe to any of the foregoing at any time. See below for more details about opting-out of receiving e-mails and newsletters and coaching.

Our interactive programs consist of numerous exercises (called Venture Sheets) and journaling opportunities (called Venture Journal) that recommend you enter personal information. Each additional Phase you subscribe to requests further and deeper disclosure of personal information through the use of Venture Sheets and consultations with the Professional Relationship Counselor assigned to you. Your entries are stored on our servers, accessible only to you and our Authorized Persons through the use of a Unique Identifier and password.

We use the personal information that you voluntarily provide through Venture Sheets and/or in consultation with your Professional Relationship Counselor solely for the purposes of providing the service of facilitating and enhancing your voluntarily requested Relationship Makeover, and to provide you and your Professional Relationship Counselor with a readily accessible, easily updated means of collecting and storing information used to enhance your Relationship Makeover.

Also, please note that any information that you include in a Shared Journal posting is available to other individuals and clients (which is why it is called "Shared").

In order for us to provide you with certain personalized features (e.g., displaying your name on your Venture Sheets, confirmation of appointments, etc.), your name and email address and the name you have chosen to identify your Key Relationship are attached to your Unique Identifier and stored on our server. Otherwise, we could not provide this very personalized experience. We also use the information we collect in the Registration Form and Venture Sheet B to customize and enhance your Relationship Makeover.

Each of our Professional Relationship Counselors are governed by their specific professional association's Code of Ethics and also by Relationship-Makeover's **Code of Conduct**. You will find a link to each Professional Relationship Counselor's applicable Code of Ethics under their picture on the [Our Professional Counselors](#) page.

Only a limited number of our administrative team are authorized to access the information you submitted for registration and payment purposes. Access by authorized personnel is controlled by passwords. No administrative team member (other than the Authorized Persons stated above) has access to the data you enter into your Venture Sheets or Venture Journal, nor are they able to connect your registration information with entries you make into your Venture Sheets or Venture Journal.

From time to time you will be given the option of receiving recurring support materials such as *Tip of the Week*, our newsletter, *Relationship Venture*, or *Venture Coaching* via e-mail from this Web Site. If you wish to subscribe to such materials via e-mail, we ask for contact information, such as name and e-mail address. You can always unsubscribe from any of the foregoing by simply completing the opt-out form at the bottom of each Support Program. You will then be unsubscribed from your selected choices, usually within two to three business days.

Location of Information Processing: All personal information collected by us is processed, used and retained on our server located in the United States.

Disclosure of Personal Information: You, and only you, may choose to disclose your personal information by voluntarily submitting portions of your Venture Journal to the Shared Venture Journal Site, which is shared with other clients on the Web Site. This Shared Venture Journal Site can only be viewed by those who have subscribed to Phases Two, Three & Four. The purpose of the Shared Venture Journal Site is solely to inspire and encourage others along this journey to relational freedom.

Website service and maintenance contractors provide us with technology and services related to operation and maintenance of our Web Site. Such contractors may have access to your e-mail address to send newsletters or announcements to you on our behalf. Access to other personal information by such contractors is strictly limited. They will have no access to the personal information you have stored in your programs, nor will they be able to match up your registration data with any other personal information about you. We also require that our server service and maintenance contractors execute non-disclosure agreements to protect the privacy of your personal information consistent with this Policy, and to not use or disclose your personal information for any purpose other than providing us with products and services.

Except as stated in this Policy or required by applicable law, we will not disclose any personal information gathered from you to any third party. **We will not give or sell your name or other information to other companies under any circumstances.**

Use or Disclosure Without Consent: There are specific situations where we may lawfully use or disclose personal information to a third party without notice or consent, which may vary depending on applicable privacy legislation, but which generally include, but are not limited to, the following:

- in case of an emergency that threatens the life, health or security of an individual or the public or where a reasonable person would consider that the use or disclosure of the information is clearly in the interests of the individual and consent of the individual cannot be obtained in a timely way or the individual would not reasonably be expected to withhold consent;
- where the use or disclosure is required to comply with a subpoena, warrant or court order, or to comply with rules of court relating to the production of records;
- where the use or disclosure of the information is pursuant to a statute or regulation of Alberta or Canada that authorizes or requires the use;
- where the use or disclosure of the information is reasonable for the purposes of an investigation or a legal proceeding; or,
- where the use or disclosure is required by law.

Disclosure of aggregate information: We never provide information that could be used to identify clients personally. We may provide research institutions or other parties with data, but if we do, the data will always be presented in an aggregate or anonymous manner, without any information that might identify any individual. For example, we might provide the following type of data to a mental health research institute: "70 percent of our clients have had trouble with depression." We may also use such aggregate information to enhance our customer service and manage our business.

Surveys. We do not disclose clients' answers to surveys to third parties other than in aggregate form. We may share such aggregated data with mental health research institutions. This information is not linked to any personal information that can identify an individual user.

Security of personal information: If you become a client, you will be provided with a Unique Identifier generated by Relationship-Makeover.com and used for tracking your progress through the Four Phase program. Clients chose their own User ID and Password that should be known only by them. Passwords are stored in an encrypted manner. Clients are advised to never share their password with anyone else. We will never ask you for your password or user name, nor will anybody else on our behalf.

The User ID and Password that clients use to log in to the Web Site are not stored on the client's hard drive. However, the Web Site does write a "cookie" to the hard drive of the computer (see below). Access to your personal information is restricted to the authorized persons stated above, and to have access to your information, they must use unique identifiers and passwords.

Your Venture Journal is stored in a completely different area of our server that can only be accessed by you using your Unique Identifier, User ID and Password. Your Professional Relationship Counselor has access only to the portions of your Venture Journal that you choose to submit to them. Subsequently you, and only you, may also choose to submit portions of your Venture Journal to the Shared Venture Journal Site, which is shared with other clients on the Web Site. This Shared Venture Journal Site can only be viewed by those who have subscribed to Phases Two, Three & Four. The purpose of the Shared Venture Journal Site is solely to inspire and encourage others along this journey to relational freedom.

We utilize the most advanced technology available to us to protect your data from outside parties. To ensure the most effective protection of your personal information, we regularly test and update our technical measures. We have a security policy that includes technical safeguards and encryption to collect your personal information. However, although we make every reasonable effort to protect your personal information from unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction by third parties, there is always a certain level of risk involved in transmitting information over the Internet and there is always some risk that thieves or hackers could find a way to defeat our security systems.

In the unlikely event of a breach of security involving a disclosure of personal information, we will provide you with a notification of such breach and any particulars of it that are available to us.

Web Sites and "Cookies": You should be aware that most web servers, including ours, collect some information about visitors, such as the browser type used, operating system, "IP" or internet address, which may identify the Internet Service Provider, and what buttons or links are clicked on.

We collect non-personal information about your use of our Web Site through the use of "Cookies." Cookies are small computer files transferred to your computer's hard drive that allow us to keep track of your individual visits to the Web Site and your movement through the Web Site. If your computer accepts our cookies, we do not take steps to link the cookie information to any personal information you provide to us. When you visit our Web Site anonymously without signing in, we do use cookies to record session activity (e.g., what areas of our site have been viewed). When you visit as a client and sign in, we also log your unique identifiers, the length of time you are engaged with a Professional Relationship Counselor and the point where you last logged out in the particular Phase you were in so that you can easily continue the exercise when you return. This information is essentially used to better manage the Web Site and improve the quality of services.

If you are using Internet Explorer, you should install the latest security measures recently released by Microsoft to enhance the security of cookies. No other web site is authorized or provided with information to allow it to access the cookies from our Web Site on your computer. However, web sites you visit through links we provide may also use their own cookies when you click on their sites or services. We do not control the use of cookies by any third parties or other web sites, or how they manage the information they gather through cookies, or how they handle any information you may provide to them in any fashion. Your use of third party web sites will be subject to their privacy policies and practices and legal terms of use and not ours, and you should consult their documents. We do not disclose any of your personal information to these third party web sites.

Your browser software can be set to reject all cookies. **If your browser is set to reject cookies, however, you will not be able to log in to this Web Site.**

E-mail: The Internet and email are inherently insecure media and means of communication. We cannot accept the responsibility of protecting your privacy of your information in transit when you send information, ideas, or concepts to us by unencrypted e-mail. If you want to keep your personal information, or your ideas, thoughts or concepts private, do not send them in an unencrypted e-mail to us, but use the Journal Feature.

Links to Third Party Websites: This Web Site may include links to other web sites, and we provide those links only as a convenience. This Policy applies only to this Web Site. We have no control over the privacy practices or content of third party web sites, nor over the behavior of the entities maintaining those web sites. You use the links we provide and any third party web sites solely at your own risk. We cannot ensure that such web sites will be available or that their contents will not change without notice. We disclaim any and all responsibility and liability for any problems, liability, losses or damages that may arise from those sites, or that you may sustain or incur from use of such web sites or reliance on their contents. We encourage you to review the privacy statements and terms of use of every web site that you visit.

Retention of Personal Information: It is our policy to retain personal information for as long as it is required for reasonable legal purposes including insurance purposes and any applicable rules of a professional organization or industry association. Upon expiry of an appropriate retention period, bearing in mind reasonable legal and business requirements, personal information will either be destroyed in a secure manner or made anonymous. Retention

periods will depend in part on your location, in order to retain information until all application legal limitation periods have expired.

Access to Personal Information: You may request access to your personal information that is contained in a record that is in our custody or control, along with the purposes for which we are using the information, the names of any recipients of disclosure of the information and the reasons for disclosure to them. Requests for access are subject to the following:

- Any requests must be in writing.
- We do not accept such requests or respond to such requests via email. This is because we must be certain that we are responding to the correct individual (see comments on the insecurity of email above).
- In order to receive a response to such a request, the requesting individual must provide us with sufficient information to locate their record, if any, and to respond to them.
- We will respond to requests in the time allowed by law, which is generally 45 days, but may be less or more.
- We will make a reasonable effort to assist applicants and to respond as accurately and completely as reasonably possible.
- All requests may be subject to any fees and disbursements the law permits us to charge and, where appropriate to do so, we may require advance payment of a deposit or the entire costs of responding to a request for access to personal information.

Please note that an individual's ability to access his or her personal information under our control is not an absolute right. We *must not* disclose personal information where:

- the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
- the disclosure would reveal personal information about another individual; or
- the disclosure would reveal the identity of an individual who has in confidence provided us with an opinion about another individual and the individual providing the opinion does not consent to the disclosure of his or her identity.

Generally, we *may choose not to* disclose personal information where:

- the personal information is protected by any legal privilege;
- the disclosure of the information would reveal confidential commercial information and it is not unreasonable to withhold that information;
- the personal information was collected by us for an investigation or legal proceeding;
- the disclosure of the personal information might result in similar information no longer being provided to us when it is reasonable that it would be provided;
- the personal information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act
 - under an agreement,
 - under an enactment, or
 - by a court; or
- the personal information relates to or may be used in the exercise of prosecutorial discretion¹.

Responses to Requests

Our responses to requests for access to personal information will be in writing, and will confirm:

- whether we are providing all or part of the requested information,
- whether or not we are allowing access or providing copies, and,
- if access is being provided, when and how that will be given.

If access to information or copies are refused by us, we will provide written reasons for such refusal and the section of applicable privacy legislation, which will generally be the *Personal Information Protection Act* (Alberta) on which that refusal is based. We will also provide the name of an individual who can answer questions about the refusal, and particulars of how the requesting individual can ask the Information and Privacy Commissioner of Alberta to review our decision.

Updating personal information: You can always contact us in order to update the Personal Information that you have provided to us at initial registration, by accessing the "Update My Info" button that appears on the side bar in MyRelationship-Makeover.com. In addition, Individuals may submit written requests to us to update their personal information, or to correct errors or omissions in their personal information. Updates will be used to update the information we have in our custody or control. If an individual alleges errors or omissions in the personal information in our custody or control, we will either correct the personal information and, if reasonable to do so, and if not contrary to law, send correction notifications to any other organizations to whom we disclosed the incorrect information; or decide not to correct the personal information but annotate the personal information that a correction was requested but not made. Corrections or amendments will not be made to opinions as this is generally not allowed under applicable privacy laws.

Dispute Resolution: Please direct any questions or concerns regarding the collection, use, retention or disclosure of personal information to us by using the **Contact Us** form. We will investigate and attempt to resolve complaints and disputes in accordance with the principles contained in this Policy.

Amendment: We may amend this Policy from time to time as required and without notice, in order to better meet our obligations under the law and to deal with any required changes to our practices in order to better comply with our legal obligations. You will be able to tell when this Policy has been amended by a change to the effective date above.

Contacting Us: If you have any questions with respect to our policies concerning the collection, use, disclosure or handling of your personal information, or if you wish to request access to, or correction of, your personal information under our care and control, or if you are dissatisfied with how we handle your personal information, please contact our Privacy Officer at privacyofficer@relationship-makeover.com or as follows:

Telephone: 877-335-8376; 403-335-8376
Fax: 403-335-2085
Box 9, Site 15, RR#1
Didsbury, AB T0M 0W0

If you remain dissatisfied after our Privacy Officer has reviewed and responded to your concern, or have other concerns or questions, you have the right at any time to contact the Office of the Information and Privacy Commissioner for Alberta at:

410, 9925 - 109 Street
Edmonton, AB T5K 2J8
Telephone (780) 422-6860 or Fax (780) 422-5682