

Privacy Policy

The Recovery Training Institute of Alberta recognizes the importance of protecting the privacy and security of your personal information. This Privacy Policy explains how we collect, use, disclose, safeguard and dispose of your information when you visit our website, use our services, or interact with us. Please read this policy carefully to understand our practices regarding your personal information and how we will treat it.

1. Information We Collect

We may collect, use and disclose different types of personal information, depending on our relationship with you. Generally, we collect the following types of personal information (not all of which may apply to you):

- Identity Information: Name, date of birth, gender, and government-issued identification details.
- Contact Information: Email address, phone number, and mailing address.
- Professional Information, such as information about your employer or other professional referral organization, job description, title and position,
- Video Recordings: Video interviews and related correspondence.

We also collect, use, and share aggregated and anonymized data for any purpose. Aggregated and anonymized data is not considered personal information because it cannot be used to identify you.

2. How We Use Your Information

We generally use the information we collect in the following ways:

- To assess suitability for coaching and providing therapeutic services to vulnerable populations.
- To conduct and record video interviews as part of our admissions process. To communicate with you, respond to inquiries, and provide support.
- To improve our services and develop new offerings.
- To comply with legal obligations and enforce our policies.
- To fulfill our obligations under grants with provincial governments.
- To manage our business, including to detect and prevent errors and fraud.

We may also use your personal information for such other purposes as you may consent to from time to time and as otherwise required or permitted by law.

3. Sharing Your Information

We generally identify to whom, and for what purposes, we will disclose your personal information (and we obtain your consent to such disclosure) at the time we collect your personal information.

We may disclose your information when we believe such disclosure is required or permitted by law. In addition, we may disclose your personal information to a third party in the event of any significant business transaction, such as a merger or reorganization.

We rely on service providers to perform a variety of services on our behalf, such as technical support providers, and data storage and processing service providers. If we transfer your personal information to a service provider, we require that they maintain the confidentiality of your personal information and keep it secure. We also require that our service providers comply with applicable privacy laws and only use your personal information for the limited purposes for which it is provided.

4. Data Security

We implement security measures in an effort to protect your personal information from loss or theft, unauthorized access, use or disclosure. We implement managerial and technical safeguards to protect against unauthorized access, use, or disclosure of your personal. These measures include encryption, malware protection, logical and physical access controls, and detection of social engineering attacks.

Despite these measures, we cannot guarantee that our safeguards will always be effective. A breach of security safeguards can result in risks such as phishing and identity theft. In such cases, we will act promptly to mitigate the risks and to inform you where there is a real risk of significant harm, or as otherwise required by law.

If you have reason to believe that your personal information is no longer secure, please contact us immediately using the contact information in the "Contact Us" section below.

5. Your Rights

We expect you to supply us with updates to your personal information, when required. We will not routinely update your personal information unless such a process is necessary.

You may make a request to review any personal information about you that we have collected, used, or disclosed, and we will provide you with any such personal information to the extent required by applicable laws.

You may also challenge the accuracy or completeness of your personal information in our records. If you demonstrate that your personal information in our records is inaccurate, incomplete or equivocal, we will amend or delete your personal information as required. Where appropriate, we will transmit the amended information to third parties to whom we have disclosed your personal information.

We may require that you provide sufficient identification to fulfill your request to access or correct your personal information. Any such identifying information will be used only for this purpose. We will not charge

you any fees to access your personal information in our records without first providing you with an estimate of the approximate fees, if any.

If you object to how we handle your request, you may have the right to make a complaint to the applicable privacy commissioner.

6. Cookies and Tracking Technologies

We use cookies and similar technologies to enhance your experience on our website and gather information about visitors' usage patterns. A "cookie" is a small text file that contains information and is stored on your computer. We use cookies and similar tracking technologies, such as web beacons and pixels, to automatically collect information about your use of our website and your interaction with our emails. Information we collect may include your IP address (or proxy server), device and application identification numbers, location, browser type, internet service provider and/or mobile carrier, pages and files viewed, searches, operating system and system configuration information, and date/time stamps associated with your usage.

If you do not wish to accept cookies, you can adjust your web browser settings so that you automatically deny the storage of cookies or are informed each time a website requests to store a cookie. Previously stored cookies can also be deleted through your web browser. Please refer to your web browser's help pages for more information. Some areas or features of our website rely on cookies and may not work if you delete or decline cookies. For more information about cookies generally please visit www.allaboutcookies.org.

7. Retention and Disposal of Personal Information

We will retain your personal information for as long as necessary to fulfill the purposes for which we collected it, and as permitted or required by law.

After the retention period, personal information is securely disposed of in accordance with our data protection policies and applicable regulations.

We may transfer your personal information outside of Canada to fulfil the purpose for which we collected it, including for processing and storage by service providers. While your personal information is outside of Canada, it is subject to the laws of the country in which it is located, which may have different data protection laws than Canada. Those laws may require disclosure of your personal information to authorities in that country. For more information about our policies and practices regarding service providers outside of Canada, contact us using the contact information in the "Contact Us" section below.

8. Intellectual Property Protection

All content, materials, and intellectual property contained within the educational offering – Empower Pathways, including but not limited to text, images, video, graphics, and software, are the exclusive property of ROSC Solutions Group and are protected by applicable intellectual property laws. Unauthorized use, reproduction, distribution, or modification of any materials without prior written consent from the owner is strictly prohibited and will result in immediate account termination and potential legal consequences.

9. Consent

By proceeding with the application process, you are consenting for us to collect, use, and disclose your personal information for the specified purposes.

If you wish to withdraw your consent to our collection, use or disclosure of your personal information, please contact us using the contact information in the "Contact Us" section below. We will accommodate your request to withdraw consent, subject to legal or contractual restrictions. Withdrawal of your consent may mean that we will no longer be able to provide you with certain products or services.

10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. We encourage you to review this Privacy Policy periodically. When changes are made, they will become immediately effective when published in a revised Privacy Policy, unless otherwise noted. We may also communicate the changes to this Privacy Policy by other means.

11. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, please get in touch with our Privacy Officer, Dr. Paul Sobey (psobey@roscsolutionsgroup.ca).

Effective Date: February 12, 2025

This Privacy Policy applies solely to information collected through our website and services and does not apply to third-party websites or services linked through our website. For information on how third parties collect, use, and disclose your information, please consult their respective privacy policies.