

Privacy Policy

Last Updated and Effective: August 15, 2025



What is this document?

Privacy policies can be dense and inaccessible. Sometimes you just want your question answered quickly without having to navigate pages of text. With this document, we hope to make that easier. We tried our best to make our Privacy Policy as easy to navigate and understand as possible. If you have any questions while reading it, please don't hesitate to reach out to support@emotionalintelligenceleadershipinstitute.com.

For purposes of this Policy and unless otherwise specified, "data" includes information that is linked to one person or household including things like name, email address, phone numbers, device ID, Third Party identifiers, contact information, and communications with our employees, coaches, consultants, and contractors using our digital communication platform (the "Platform") to provide services. Some jurisdictions might consider this to be "personal data," "personally identifiable information," or "sensitive personal data" in certain circumstances. When you use and access our app or website, you accept and agree to both the Terms and Conditions and this Privacy Policy, including that we'll share certain data with Service Providers.

Please read this Privacy Policy carefully. It describes how the **Emotional Intelligence Leadership Institute** ("EILI", "we", "us", 8340854 Canada Inc. DBA the Emotional Intelligence Leadership Institute) will collect, use, store, disclose, and protect your information in relation to our Services.

Will this document be updated?

We may update this Privacy Policy. When we make significant changes to this Policy, we will notify you through our website or app when you log in to your account. We encourage you to periodically review this page for the latest information.

Definitions

The following provides the meaning of certain terms used in this Policy. If not defined below, the capitalized words and phrases in this Policy have the same meaning as in EILI's Terms of Use.

"EILI Platform" means, collectively, the hardware, software, applications, websites, Content, products and services owned and/or operated by us to enable the provision of remote Services to Users, among other purposes.

"Aggregated" means anonymized data and information.

Privacy Policy

Last Updated and Effective: August 15, 2025



“EQi” a set of emotional and social skills that guide how individuals express themselves, develop relationships, cope with challenges, and effectively utilize emotional information for overall well-being and success. EQi also refers to the assessment known as the EQi 2.0 Assessment developed by Multi-Heath Systems (MHS) and EQ 360 also by MHS.

“Information” means, collectively, “Personal Information” (information about an identifiable User as further defined in Applicable Law) and “Personal Health Information” or “PHI” (information about an identifiable User’s health or healthcare as further defined in Applicable Law).

A **“User”** is an individual registered to use the EILI Platform, including, unless otherwise specified, as part of a customized program provided by a third party. Unless we make a distinction, “Users” means all Users.

“Applicable Law,” in relation to EILI, Authorized Providers, or Users, means the laws and regulations, including privacy laws and regulations, to which each is subject.

“Content” means general information about topics posted on the EILI Platform, access to which is not the delivery of Healthcare Services and does not replace and cannot be relied upon as Healthcare Services.

“Process” in this Policy refers generally to activities done with data as “Processing” or “Process”. Examples of Processing include collecting, storing and using data.

“Third Party” means an entity that is not EILI, not a Service Provider, or any other parties that are specifically called out in this Policy.

“Facilitate tools for you and your Service Providers” means processing certain data to provide service tools within the Platform, such as the EQi and other worksheets, assignments, journal entries and others.

Data Collection and Processing

Do you collect, store, or process my data?

The categories of data which we Process are listed below. We Process this data to do things like operate the Platform and make sure you are able to use our services effectively. We may also Process data to send you periodic emails or text messages. In some cases, these communications are to help provide services. Other times, if permissible under applicable law, they are to provide marketing communications. You can opt out of receiving texts or marketing communications at any time. Additionally, provided you opt in, we may Process and share some

Privacy Policy

Last Updated and Effective: August 15, 2025



data with Third Parties for advertising purposes. You can find more details in the relevant sections of this Policy.

What specific data are you Processing and why do you collect it?

What data we Process depends on how you're using our website, app, or the Platform. We explain in the section below the specific data we Process and, in the section following this, the business purpose for collecting and Processing this data.

Some examples of what your data may be used for:

- Connecting you with Services - such as facilitating information sharing between you and your Service Providers.
- Communicating with you - such as needing to make sure that if you ask a question or have a concern about the Platform, we're able to respond to you and provide an answer. Additionally, if you represent an organizational customer, such as a business or nonprofit, then the EILI team may contact you in your professional capacity to service your organization's account, answer questions, and provide support.
- Monitoring and improving the quality of Services provided
- Personalizing your web or app experience
- Helping us understand how you use our services, how we can improve our products and services to make them more effective and convenient, and offer you new features
- Complying with laws
- Protecting your safety and the safety of others. For example, if we have reason to believe that you or any other person may be in immediate danger or your privacy has been infringed upon, we may use the information to investigate or reach out to you or the appropriate authorities if it is legally appropriate/permitted to do so.
- Sending opportunities, promotions, news, updates and reminders about our services and your account
- Monitoring and protecting the security of the Platform

We may rely on one or more legal bases for processing, which may include: legitimate interest, consent, and performance of contracts.

Types of data we collect:

"Visitor data"

- When you visit the website, app, or Platform, we Process information like the particular pages visited or which features you interacted with, the amount of time on the website or app, site/app/Platform errors, information about the type of device and browser you're using, and IP address. We may Process IP address, hashed email address, External Identifiers and Internal Identifiers (if available based on the settings of your device) and

Privacy Policy

Last Updated and Effective: August 15, 2025



will share the information with Third Parties, if you opt in to Advertising (previously "Targeting cookies") and web beacons.

"Onboarding data"

- To create an account with the Platform, the user first fills out a questionnaire. We Process the information used to complete this questionnaire.

"Account Data"

- Once a user creates an account with the Platform, we Process data such as the account name the user selects, and other demographic and contact information, such as email, age, phone number, emergency contact details, and whether a user verifies their email address. We may ask a user if they have insurance and, if so, what plan they have.

"User ID"

- We assign each user (including Service Providers) who creates an account a sequentially-generated user ID. User IDs are unique to each account and are required in order to enable the Platform to function.

"Transaction Data"

- We Process data about payment transactions on the Platform such as whether a user completed payment for our services, signed up for services using a trial offer, canceled or ended a trial, received a discount or financial aid, or received any extensions or refunds. We also process whether a visitor has registered to create an account.

"Engagement Data"

- We Process usage data about how you interact with emails we send and different features when you're logged into the platform. For emails we send, we collect usage data including whether you receive an email, open it, and click any links it contains. When you log onto the Platform, we also collect usage data about activity conducted during that logged in session such as when a user logs in, the login timing, number and length of messages received or sent through the Platform, received or sent message timing, number and duration of live session scheduled or conducted, the number and timing of use of other features such as worksheets, journals, and goals. This category does not include Services Data like the content of any messages sent or received by users, the content of any live sessions, or the content of journal entries, worksheets, or goals.

"Services Data"

- We Process written communications and related information users share with their Service Providers to facilitate the Services. This includes messages with Service Providers, and the EQi. Users may also choose to send audio messages which are automatically transcribed.

Privacy Policy

Last Updated and Effective: August 15, 2025



"Services Quality Data"

- We Process client feedback about their Service Provider including ratings and reviews of their Service Provider, actions regarding switching Service Providers or quitting Services, and the reason selected by the client. We Process Service Provider session availability, session cancellations and no-shows.

"Customer Service and Communications Data"

- We Process communications users have with our Customer Service team.

"Service Provider Data"

- In order to engage with Service Providers who express an interest in working with us (such as individuals who provide information at in-person or online recruitment events), follow up with Service Providers who applied to work with us on the status of their applications, to identify, match, credential, re-credential, run checks, issue payments, we process Service Provider Data information such as the Service Provider's name, bank account information, gender, date of birth, governmental identification numbers (SIN/SSN), e-mail address, phone number, address, license information, and areas of interest/expertise/language, education, and job history. Service Providers may also separately and outside of this Policy, consent to using facial scans to assist logging them in and verifying their identity. Depending on the country in which you are credentialed, we collect our independent verification of criminal background check.

"EILI Business Data"

- EILI Business is our offering for employers and groups bringing our Services to their organizations. To facilitate these services, we need to have a way to administer benefits by confirming individuals are part of an organization and are therefore eligible to receive Services. We also process data from individuals who engage with us and provide their data in a professional capacity on behalf of an organization, such as:
 - Business owners who request a EILI Business product demonstration
 - HR managers responsible for overseeing their company's active EILI Business account ("Account Administrator")
 - Conference attendees who attend an EILI presentation or event, and provide information for additional outreach from our representatives.
- Such data includes names, organization email addresses, unique identifiers or "IDs" issued by organizations, organization name, and organization size. With your consent, we may record and transcribe EILI Business product demonstrations.

"Service Providers, including Coaches and Contractors, Engagement Data"

- For Service Providers, we process such data as number/times of Service Providers log in to the Platform, the number of live sessions conducted by a Service Provider, number of messages and words exchanged by a Service Provider, number of worksheets,

Privacy Policy

Last Updated and Effective: August 15, 2025



handouts or other materials shared by a Service Provider, and the EQi shared with a Service Provider.

"Service Records"

- We Process Service Records which is a record with the minimum information your Service Providers would need to identify you and document the services you received. This Record includes your Service Provider's internal notes, dates you received services, and the following specific subsets of Onboarding, Account, and Service data.

If you're a Service Provider on our Platform, or being recruited to join us, in addition to the above, we may Process Service Provider Data, Service Quality Data, Service Provider Engagement Data, User ID, Onboarding Data, Account Registration Data to:

- Assist in the recruitment process and onboard you to the Platform; Operate the Platform, match clients to you based on your preferences, and facilitate the communication between you and your clients;
- Verify your identity and secure your account;
- Run background checks and other screening required for credentialing and re-credentialing purposes;
- To pay you and comply with all relevant tax laws;
- Provide you quality statistics, feedback from our EILI team, and feedback from clients.
- Offer you information about new features, opportunities, perks and other incentives.
- Send you email, calls or SMS reminders, notifications & updates about your application, profile or account.

In addition to processing, we also share some data with Service Providers in order for us to operate the Platform and to perform necessary website and application functions. Additionally, when you opt into sharing, we share certain data with Third Parties. For more information please see the section: "What are the purposes for sharing my data?"

If you opt in to Advertising cookies and web beacons, some Visitor Data, excluding activity when you're logged in and have started services and/or PHI, may be shared for advertising purposes.

Do you Process location data?

We process your IP address to determine your approximate location so that we can personalize the platform for you. For example, we show you relevant information about our service that may apply to visitors from your country.

Privacy Policy

Last Updated and Effective: August 15, 2025



We also utilize your approximate location to improve your user experience when using our platform. For example, we may auto populate your province or state (if applicable) and country when you are completing our onboarding.

We do not request or process exact location information such as information provided by your phone via GPS.

We Process your address information when you provide it as part of your emergency contact information when you start Services on the Platform. Your contact information is required to comply with regulations and ethical code. It can be used, for example, in case your Service Provider believes you are in immediate danger. When you are filling out this field, we may process your rough location to provide autocomplete suggestions for your convenience.

Rough location using your IP address is also Processed by any security API tools we use. Security API tools can be used to identify potentially malicious actors trying to access our site.

To learn about the additional purposes for which we Process IP addresses, please see:

How do we use Artificial Intelligence?

We use Artificial Intelligence (AI) and Natural Language Understanding (NLU) algorithms to support and develop features to provide you services and improve the quality of the services. Our processing of data may include some automated and some human (or manual) methods of processing. The automated processing typically includes features aimed at completing manual, repetitive tasks more efficiently. For example, we may use AI features to detect security risks, synthesize information for customer service agents, and help Service Providers manage and document sessions more effectively. We expect these improvements to ultimately improve our services and experiences for clients and Service Providers. To help ensure these tools remain fair and accurate, as well as protect the privacy of our clients and Service Providers, we either thoroughly review a model or build it internally and, unless you agree otherwise, do not use any private communications directly between you and your Service Provider, such as sessions data, the EQi, personal messages, or any other type of private communication you have with your Service Provider in a session to train an AI or NLU model.

Data Sharing

What are the purposes for sharing my data?

Here's some more information about the purposes for which we share your data:

- Your data may be shared to comply with applicable laws. For example, a court might subpoena information from us where we would be required to share certain information requested in the subpoena. This is not unique to EILI and is applicable to in-person services as well. Keep in mind that, as a general rule, we defer to your Service Providers

Privacy Policy

Last Updated and Effective: August 15, 2025

to decide to produce (or not produce) any notes or messages you have had with them. Many jurisdictions have strict rules governing such relationships and the confidentiality requirements associated with that. We encourage you to discuss with your Service Provider early on if you have concerns about their disclosure obligations. You should also be aware that Service Providers may be obliged to disclose information to authorities to meet professional and legal responsibilities. Specifically, some laws require Service Providers to disclose information and/or take action for: (a) reported or suspected abuse; (b) serious suicidal potential; (c) threatened harm; and (d) court-ordered treatment. You should speak with your Service Provider if you have concerns about this.

- Occasionally, your data may be handled by a select number of employees who are part of 8340854 Canada Inc. for support services. These employees are under strict duties of confidentiality.
- We may share certain data with Platform Providers that provide services that help us operate the Platform. Examples include:
 - Data hosting and storage providers: For example, cloud hosting providers such as Amazon Web Services (AWS).
 - Technology Service Providers: For example, we sometimes integrate tools into our Platform which give our Platform more functionality, like technology that helps us provide live audio, video and group meetings.
 - Customer Service providers: For example, we use a tool that helps keep track of requests and questions from our clients, visitors and Platform Providers in a secure way.
 - Email management and communication providers. For example, we may use a tool that makes reaching out to you easier for us and more convenient for you.
 - Marketing and advertising Providers: For example, we may partner with an agency to run a marketing campaign or to help us better understand how to run our own campaigns to reach more people who may be interested in becoming clients. Remember that Platform Providers can only legally use data at our direction - no other person or company can authorize how they use it and they cannot disclose data that is individually identifiable to any other person or company, other than to us or the Platform Providers' own subcontractors provided that they're bound to data Processing terms that are no less restrictive than the Platform Provider's terms.
 - Billing and payment processing providers
 - Reporting and analytics providers: For example, we might use a service to help us keep track of which pages and features are most used on our site.
 - Advisors and lawyers: To assist with business matters.
 - We may share some of your data with Platform Providers to ensure the safety and security of the Platform and that of our users.

Privacy Policy

Last Updated and Effective: August 15, 2025



- If you're a Service Provider on our Platform, or being recruited to join us, in addition to the above, we may share certain data with Service recruiters in order to facilitate, monitor, and track the recruitment process. If you are a Service Provider on our Platform, we may also share certain data such as information you volunteer in or through the Platform including, but not limited to, your name, photograph, information about your credentials, experience, specialties and qualifications with insurance payors or health plans for the purposes of contracting with them. We may also share this information with vendors that accreditate/certify our credentialing processes and otherwise help us streamline the credentialing process.
- For clients who receive services in connection with an employer, organization, or other business partner, we may share group-level usage data, which cannot be directly connected to you, with your organization. In the instance of clients who receive services through an employee program, your employer will provide notice for any individual-level data which is shared, if you are utilizing one and have provided them with consent for us to do so. If you have any questions on how your data will be used by or shared with your employer, please reach out to your employer directly.
- We may share some of your data in connection with an asset sale, merger or bankruptcy.

Note that if you make any information publicly available on the Platform, such as with a public post, or anything said publicly in a group setting, anyone may see, hear and use such information.

If you opt in to "Analytics", we may use analytics cookies and other tracking technologies to share your data with trusted Platform Providers that assist us to Process data for activities including but not limited to analyzing traffic sources, visits, and site interactions. This analysis helps us to improve our products and services.

If you opt in to "Advertising" information regarding your activity on our websites, excluding activity when you're logged in and have started Services, may be shared for advertising purposes. To learn more, see below: "Are you using my data for advertising?"

Do you sell my data?

We aren't paid by anyone for any data. However, in certain jurisdictions, the laws define "sale" broadly to include the sharing of personal information in exchange for anything of value. If you opt in to our use of Advertising cookies and web beacons, this use may be considered a "sale" of personal information under that specific jurisdiction.

Privacy Policy

Last Updated and Effective: August 15, 2025



Are you using my data for advertising?

In order to reach people who may be looking for similar services, we advertise on some Third Party web properties such as Third Party websites and apps. In order to minimize advertising costs related to this process and downstream costs to you, we strive to deliver ads that are relevant, interesting, and personal.

Therefore, if you opt in to Advertising cookies and web beacons, some Visitor Data, excluding activity when you're logged in and have started Services, may be shared for advertising purposes. As a result, you may see ads for our services on some Third Party websites.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of several third party ad servers' and networks' cookies simultaneously by using an opt-out tool created by the [Digital Advertising Alliance of Canada](#) and an opt-out tool created by the [Network Advertising Initiative](#). You can also access these websites to learn more about online behavioural advertising and how to stop websites from placing cookies on your device. Opting out of a network does not mean you will no longer receive online advertising. It does mean that the network from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

If you use the App and have "Allowed" app to track using IOS or have opted into Advertising Cookies on Android, some data such as your mobile device identifier (IDFA and IDFV for iOS, and Android Advertising ID for Android) and data about how you use the App which is collected by one of our Platform Providers will be used to make our advertising more effective. This happens through an integration we have enabled between platform services such as Google Ads.

Even if you do opt in, we still do not engage in "retargeting" advertising. Retargeting advertising is a type of advertising whereby advertisers leverage the fact that you viewed a page or took an action on their site to advertise to you again on third party properties in the hope that you will see the ad and return to their site.

To be clear, we don't share any data or information you share with your Service Provider with any Third Party advertisers. Even if you opt in to Advertising cookies and web beacons, we still don't share information with Third Party advertisers like client names, phone numbers, questionnaire answers, sessions data, messages, worksheets, or any other type of private communication you have with EILI or your Service Provider on the Platform.

As described further above on Data Sharing, we may also partner with some Platform Providers to assist in marketing campaigns. Remember that in addition to needing a series of rigorous security standards (as further detailed here), Platform Providers can only legally use data at our direction - no other person or company can authorize how they use it and they cannot disclose

Privacy Policy

Last Updated and Effective: August 15, 2025



data that is individually identifiable to any other person or company, other than to us or the Platform Providers' own subcontractors provided that they're bound to data Processing terms that are no less restrictive than the Platform Provider's terms.

Data Retention, Erasure, and Exporting

How long do you retain my data and how do I request data erasure?

EILI is committed to ensuring that all applicable client data is retained only for the amount of time required to provide relevant products and services and in accordance with relevant legal requirements.

Certain categories of data are retained for a period of time after you cancel your Services or your Services become inactive. These categories of data are retained to allow for a seamless reactivation in the event you begin using our services again and allow Service Providers to reference historical information. Retaining this data is also needed to ensure our products and services function.

In addition to the data retention schedule outlined below, EILI maintains a process for all clients (regardless of where they live) to receive and process, without undue delay, requests to erase or access their data.

The following sections describe both how long a client can expect their data to be retained with respect to specific account information as well as how to request data erasure and access. In this Policy, data erasure is defined as the permanent removal or obfuscation of identifiable data so that it is no longer accessible by anyone.

Retention Policy

EILI's data retention policies are based upon what data is being Processed, whether or not the client has participated in Services, and if the client proactively requested data erasure or if the erasure is triggered due to Platform inactivity.

How long your data is retained:

- If you did not start the Services, your data is retained for 3 years after your last login date and is then erased.
- If you did start Services, your data is retained for 10 years after your last login date and is then erased.
- If you request data erasure, your Services data is retained for a period of 10 years following the request, but all other personal identifiable information in the following

Privacy Policy

Last Updated and Effective: August 15, 2025



categories is erased within a timely manner of the erasure request: Visitor Data, Onboarding Data, Account Data, User ID, Transaction Data, Customer Service and Communications Data.

Exercising Your Data Protection Rights

As stated, you have certain rights under data protection laws, including the right to request that we erase personal data we hold about you, and the right to request a copy of certain data. The following sections describe how you can exercise those rights.

Requesting Data Erasure

To request data erasure, please directly contact EILI at support@emotionalintelligenceleadershipinstitute.com and we will assist you with the process. Additionally, if, under applicable data protection laws, you have the right to request that data we hold about you be edited or rectified, you may also make this request by contacting the email address above. You can expect to receive an email confirming receipt of your request within 24 hours.

We will only comply with a request for the erasure of your data if we can verify your identity. There is usually no charge. In exceptional circumstances, we may charge a reasonable fee after discussing the fee with you.

If you reach out to us, we have specific requirements that must be met in order for us to process your data erasure request.

Requirements:

- Only you or your authorized representative may make a request on your behalf.
- You must provide sufficient information that allows us to reasonably verify your identity or status as an authorized representative.
- You must provide details that allow us to understand, evaluate, and respond to your request.
- In some circumstances, legal or regulatory requirements limit our ability to honour erasure requests. As such, we may decline requests for erasure if the information is:
 - Subject to a litigation hold or legal request to preserve it.
 - Necessary to comply with laws and regulations and to maintain business integrity.
 - Services Record (described above) falls under this exemption.

Additionally, compliance obligations require us to retain records documenting certain interactions you have with us related to your Services. As such, we cannot honor erasure requests for information contained in records of:

Privacy Policy

Last Updated and Effective: August 15, 2025



- Communications about complaints and erasure or access requests.
- Disclosures of personal data to Third Parties.

If we don't intend to comply with a request, then we will tell you why this is the case, and outline how we weighed your rights and freedoms against our legal obligations. In such instances, any information retained will only be used for purposes contemplated under the legally recognized exemption.

Requesting a copy of my data

To receive a summary copy of your data, please email us at support@emotionalintelligenceleadershipinstitute.com. The data you will receive as part of this request may include the contact information that you input on the site, EQi answers, worksheet entries, emergency contact information, messages you sent to your Service Providers, and other personal information.

Additional data which we may maintain includes email interactions with our help or support desk, which is stored on the Platform. As with data erasure, we are not always able to respect your request for data access. For more information on why this may be and how the situation will be handled, please reference the previous section.

Security and Anonymity

How do you keep my data secure?

We apply industry standards and strive to apply best practices to prevent any unauthorized access and disclosure. Internet-based services carry inherent security risks, but our systems infrastructure, encryption technology, operation and processes are all designed, built, and maintained with your security and privacy in mind.

We have numerous robust security practices such as:

- All messages between a client and their Service Provider are secure and have 256-bit encryption.
- Our servers are distributed across multiple Tier 3 AWS Data Centers for optimal security and protection.
- Our browsing encryption system (SSL) follows modern best practices.
- Our databases are encrypted and scrambled rendering them useless in the unlikely event that they are stolen or inappropriately retrieved.
- We have robust monitoring and alerting systems and procedures in place that include both automated systems and humans. For example, there are always security personnel active in our 24/7 rotation.

For your own security, keep the following in mind:

Privacy Policy

Last Updated and Effective: August 15, 2025



- Phishing: This is a type of online identity theft or account hacking. We will never request your login information or credit card information in any non-secure or unsolicited communication. You should always be diligent when you are asked to provide your account information and make sure it is in our secure system.
- External links: Our Platform may contain links to an external website or service. We do not control external websites, and do not have control over their privacy policies and terms of use. The fact that we link to a website is not an endorsement, authorization, or representation of our affiliation with that external party or of their privacy and security policies or practices.

Cookies and Web Beacons

What is a cookie or web beacon?

A "cookie" is a small data file that is accessible within a folder on a computer, and it is used for record-keeping purposes. Cookies are used to enhance performance of the Platform, personalize your experience and can be used for Third Party tracking (as described above). For example, cookies may be used to help you quickly log into certain platforms and websites without having to enter your credentials every time.

A "web beacon" or "pixel" is a tiny and sometimes invisible image or embedded code, placed on a web page or email that can report your visit or use to a Third Party (as described above). In general, these tools can be used to monitor the activity of users for the purpose of web analytics, advertising optimization, or page tagging.

What are you using cookies and web beacons for?

We use our own cookies and web beacons to deliver a faster and safer experience, to monitor and analyze usage, to comply with laws, and for advertising purposes.

How can I stop receiving direct marketing emails from you?

You can always opt out of receiving marketing emails. In order to opt out, you can select the unsubscribe link located at the bottom of the relevant email communication.