



1. INTRODUCTION

This Privacy Policy describes how the Company collects, uses, and shares information about visitors to our websites at www.alexandravillarroel.com and www.avacoaching.com, attendees of our programs, individuals who contact us to purchase materials or request information, and other users of our services. The Website and our other programs and services are the “Services.” This Policy describes how we obtain and use personal data (which can be used to identify a specific individual) and anonymous data (which cannot).

Region specific provisions.

Certain provisions of this Policy, which are clearly labelled, apply only to users who are citizens or residents of particular regions (e.g., the EU or Quebec). Otherwise, the Policy applies to all users of our Services, regardless of location.

Children.

The Services of Alexandra Villarroel Abrego and A.V.A. Enterprises, Inc are not directed to children. If you become aware that a child (based on the jurisdiction where the child lives, which in Canada means someone under the age of 13) has provided us with Personal data without parental consent, contact us at the location identified below in the Contact Us section.

2. WHAT PERSONAL INFORMATION DOES THE COMPANY COLLECT?

We collect personal information that you enter on our Sites or otherwise volunteer to us when you contact us to, among other things, make purchases, request information, or register for or attend our programs. You can choose not to provide certain information, but then you might not be able to take advantage of many of our features.

For purposes of this Policy, “Personal Information” means information (whether stored electronically or in paper based filing systems) relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal Information comprises the categories of Personal Information defined by the PIPEDA, which includes:

Identifiers Name, address, email, phone, ssn, driver’s license

Other Data Financial information, medical information, health insurance information

Protected Classes Race, gender, sexual orientation, religion

Commercial Information Records of personal property, purchasing or consuming histories or tendencies

Biometric Information Fingerprints, retina scans, face prints

Internet Activity Browsing history, search history, IP address, website interactions

Geolocation Data GPS coordinates, location history



Sensory Data Audio, electronic, visual, thermal, olfactory

Professional Data CV, resume, employment history

Education Data Educational background, grades, scores

Inferences Drawn from the above categories, such as preferences, characteristics, attitudes, predispositions, abilities, aptitudes, intelligence, psychological traits

The examples given in this table are not meant to provide an exhaustive list, but are examples of the kinds of data included in each category. A.V.A. does not collect Personal Information in every one of these categories, and we identify below which categories we collect.

Personal Information under the PIPEDA also includes any other category of personal information not included within the PIPEDA's definition. We refer to this category as "Other Data," and it includes information such as financial information (bank account number, credit card number, debit card number), medical information, health insurance information, and insurance policy number.

A.V.A. collects only that Personal Information that is relevant for the purposes for which the data is requested. A.V.A. does not use your Personal Information in any way that is incompatible with the purposes for which it was collected or for which you have consented.

INFORMATION YOU GIVE US

When you contact us through our Sites, or by corresponding with us by phone, e-mail, or otherwise, or attend an A.V.A. event, we may collect Personal Information including:

Identifiers : name, address, email, and phone; for current or prospective affiliates, suppliers, and subcontractors, personal information such as social security number, federal tax ID number, or other relevant information, as applicable

Other Data (1798.80): credit card and account information collected when you purchase products or services; medical and health data (e.g., as necessary when participating in some of our live events); self-assessment data and results, such as information you input when taking self-assessment quizzes, DISC assessment tests, and the like;

Protected classes : gender, sexual orientation, self-assessment data and results (i.e., information you input when taking self-assessment quizzes, DISC assessment tests, and registering for seminars);

Professional Data : for those considering careers with A.V.A., professional data and education information such as resumé or C.V., salary history, education history, citizenship information, and position sought, as applicable; [When considering an individual for employment, additional Personal Information may be collected, as set forth in our Employee Privacy Policy];

Education Information : as needed for participation in programs and live events;

Inferences : Personal information about your goals and aspirations for our products, services, and live events, or inferences derived from that information.

We do not collect or receive Biometric Information or Sensory Data.



INFORMATION WE COLLECT AUTOMATICALLY

Internet Activity : When you visit our Sites, our web server automatically collects and stores the following information:

The Internet protocol (IP) address used to connect your computer to the Internet, refeA.V.A.ng website address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our Sites (including date and time), pages on our Sites you viewed; page response times, download errors, duration of page visits, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number;

Our Sites uses cookies and pixel tags to collect this information.

INFORMATION WE RECEIVE FROM OTHER SOURCES

This is information we receive about you from third parties who operate other Sites or services we use in order to provide our products and services to you. We work closely with third parties, including, for example, business partners, promoters, affiliates, and sub-contractors in technical, payment and delivery services, advertising networks, marketing analytics providers, promotions, and search information providers. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

COOKIES

Our Sites uses cookies to personalize your experience and target advertising, and we recommend you review our Cookies policy.

3. HOW DOES THE COMPANY USE PERSONAL INFORMATION?

INFORMATION YOU GIVE US

We will use this information:

- to provide you with the Services that you request from us;
- to carry out our obligations arising from any contracts entered into between you and us, or between you and our promoters, affiliates, or distributors;
- to contact you in the future to provide you with information about other products and services we offer, or that are offered by our affiliates or third party vendors;
 - to notify you about changes to our Services;
 - to comply with applicable laws and regulations;
- to assess your suitability for participation in our live events, and to determine additional A.V.A. materials, services, or events to recommend and market to you;
- for training purposes, quality assurance, and to record details about the products and services you order from us;
 - to make inquiries about you for credit reference purposes;
 - to perform data analyses (including anonymization and aggregation of Personal Information);



for prospective employees, to respond to and process your job application and CV.

INFORMATION WE COLLECT ABOUT YOU

We will use this information:

to provide targeted advertising and marketing services;
to administer our Sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes;
to improve our Sites to ensure that content is presented in the most effective manner for you and for your computer;
as part of our efforts to keep our Sites safe and secure.

INFORMATION WE RECEIVE FROM OTHER SOURCES

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

4. DO WE SHARE YOUR PERSONAL INFORMATION WITH ANY THIRD PARTIES?

A.V.A. does not sell your Personal Information to any third parties. To provide the Services, we sometimes disclose Personal Information to service providers for business purposes.

Sometimes we disclose your Personal Information to those third parties, and they sometimes collect your Personal Information in the first instance and provide it to us.

Our service providers are contractually obligated to comply with all applicable laws (e.g., the PIPEDA), and all such third parties use your Personal Information only on behalf of A.V.A. and under the instructions of A.V.A. on how your information may be used and processed. A.V.A. takes reasonable steps to ensure these third parties use your Personal Information only for the purposes for which they have been engaged by A.V.A., that they do not share or sell your Personal Information to anyone else.

By enjoying our Services and sharing your Personal Information, you agree that we have the right to share the categories of Personal Information we collect, as identified in Section 2 with our service providers for the following business purposes:

Sales – for the purpose of fulfilling requests from you to purchase goods and services from our Sites or at our events;

Targeted advertising – to provide advertising of A.V.A.'s programs and services on other Sites and platforms;

Marketing – for the purpose of direct marketing of goods and services offered by A.V.A. and our affiliates that you may be interested in;



Self-Assessment testing – for administering and providing self-assessment testing services, including the DISC assessment test;

Cloud services – for provision of cloud storage services;

Contractual performance – for the performance of any contract we enter into with you, or they enter with you on behalf of A.V.A.;

Web analytics – analytics and search engine service providers that assist us in the improvement and optimization of our Sites;

Medical assessment – for the analysis of medical and health information you submit to determine if you are an appropriate participant in our live events.

We may also disclose your personal information to third parties in the following circumstances: In the event that we sell or buy any business or assets, in which case we will disclose your Personal Information to the prospective seller or buyer of such business or assets as part of the purchase, transfer, or sale of services or assets;

If we sell all or substantially all of our assets to a third party, in which case personal information about our customers will be one of the transferred assets;

If we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation, or any lawful request by public authorities (including to meet national security or law enforcement requirements), or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of us, our customers, or others.

Whenever we share information with third parties, we will take steps to ensure that the third parties put in place adequate measures to safeguard your Personal Information, and they will be required to use any Personal Information for only the intended purpose for which it was shared.

5. OUR STORAGE OF YOUR PERSONAL INFORMATION

A.V.A. uses reasonable and appropriate measures to protect your Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing undertaken and the nature of the Personal Information we collect.

We will keep your personal data for as long as we need it, or as otherwise prescribed by law, for the purposes set out above. This period will vary depending on your interactions with us. We may also keep a record of correspondence with you (for example if you have made a complaint about a product) for as long as is necessary to protect us from a legal claim.

You may unsubscribe from any of our online e-mail updates and marketing by following the unsubscribe instructions in the body of any e-mail message we have sent to you. We will take commercially reasonable steps to implement your unsubscribe requests promptly, but you may still receive promotional information from us by mail for up to 60 days, and up to 10 days for e-mail. You may also continue to receive information from those third parties to whom we have previously disclosed your Personal Information.

Please note that when you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.



6. ACCESS TO OTHER WEBSITES

Our Sites may include links to and from other websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites are not covered by this Privacy Policy. We are not responsible for the privacy practices of any third parties or the content of linked sites although we do encourage you to read the applicable privacy policies and terms and conditions of such parties or websites. This Privacy Policy only applies to how A.V.A. deals with your Personal Information, and it does not apply to any other company or any other company's websites even if you access them via our Sites. Please check those websites' policies before you submit any Personal Information to them.

7. PROTECTING CHILDREN'S PRIVACY

We are strongly committed to protecting the safety and privacy of children who visit our Sites. Our Sites are not designed nor are they intended to be used by children under 13, and we do not knowingly collect personal information online from children under 13 and have adopted techniques to ensure compliance with this Privacy Policy and the Children's Online Privacy Protection Act of 1998 ("COPPA").

Our Sites includes content that we believe to be unsuitable for children under 13, and we encourage all parents to talk to their children about online safety and to monitor their children's use of the Internet.

8. ADDITIONAL POLICIES IN COMPLIANCE WITH THE PIPEDA

The PIPEDA affords consumers the rights with respect to their Personal Information set forth in this section.

8.1 RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED, USED, DISCLOSED, OR SOLD

Consumers have the right to request that the Company disclose what personal information it has collected, used, disclosed, and sold over the 12-month period preceding the Company's receipt of such a request. To exercise this right, a consumer must submit to the Company a verifiable request to know such information. This request can be submitted by following the procedures set forth in the Contact Us section.

8.2 RIGHT TO REQUEST DELETION OF PERSONAL INFORMATION

Consumers have the right to request the deletion of their personal information collected or maintained by the Company. To exercise this right, a consumer must submit to the Company a verifiable request to delete such information. This request can be submitted by following the procedures set forth in the Contact Us section.



8.3 RIGHT TO NON-DISCRIMINATION FOR THE EXERCISE OF A CONSUMER'S PRIVACY RIGHTS

Consumers have the right to not be discriminated against because the consumer exercised any of the consumer's rights under the PIPEDA.

That means that the company may not deny goods or services to the consumer, charge different rates for goods or services, or provide a different level or quality of goods or services if the consumer chooses to exercise their rights under the PIPEDA (unless the different rate or different level or quality is reasonably related to the value to the business of the consumer's data).

8.4 NOTICE OF FINANCIAL INCENTIVE

A.V.A. offers a financial incentive to its users and clients who refer friends and family to A.V.A.. When and only when using your affiliate link (which you can request by contacting us), you may receive a percentage of your referral sale.

8.5 SUBMITTING A PIPEDA DATA REQUEST

To submit a request to know about the Personal Information we collect about you as described in Section 8.1 or a request for deletion of your Personal Information as described in 8.2, , please contact us by emailing us at contact@alexandravillarroel.com.

A.V.A. is required to verify the identity of the individual requesting access to a consumer's data or requesting deletion of a consumer's data. To verify your identity, you must provide:

- userid and password for A.V.A.'s Sites; or
- if A.V.A. has previously received your email address, A.V.A. may verify that you have access to that email address by sending a verification code; or
- if A.V.A. has previously received your mobile number, A.V.A. may text you a verification code.

8.6 AUTHORIZED AGENT

Consumers may designate an authorized agent to exercise a PIPEDA right on the consumer's behalf. If a consumer utilizes an authorized agent to exercise a PIPEDA right, the following proof that the agent has been authorized to act on the consumer's behalf will need to be provided:

- Proof of written permission by the consumer for the authorized agent to act on his or her behalf and separate verification of the consumer; or
- Proof that the authorized agent holds a power of attorney to act on the consumer's behalf.



9. ADDITIONAL POLICIES IN COMPLIANCE WITH THE EEA PRIVACY LAWS

In addition to the other policies described in this Privacy Policy, residents of the European Union or the EEA are afforded the following additional rights and protections as required by the General Data Privacy Regulation (“GDPR”). The additional rights and protections set forth in this section of this Policy apply only to residents of the European Union or the EEA.

9.1 GDPR DEFINITIONS

THE FOLLOWING ADDITIONAL DEFINITIONS APPLY TO THIS SECTION OF THE PRIVACY POLICY:

“Controller” means the Company which is the organization that determines the purposes for which, and the manner in which, any Personal Information is Processed and used in its business.

“Processor” means any Person Processing Personal Information.

“Person” means a natural person, corporation, association, organization, partnership, or other legal entity.

“Processing” is any activity that involves use of the Personal Information. It includes, without limitation, obtaining, recording or holding the Personal Information, or carrying out any operation or set of operations on the Personal Information including organizing, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring Personal Information to third parties.

9.2 THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

In order to comply with the GDPR, we are required to set out the legal basis for the processing of your Personal Information. In accordance with the purposes for which we collect and use your Personal Information, as set out above, the legal basis for processing your Personal Information will typically be one of the following:

our own legitimate business interests, or the legitimate business interests of our third party partners, promoters, affiliates, distributors, suppliers, vendors, and subcontractors, such as, for example, providing direct marketing to our customers of our products and services that we think would be of interest, permitting prospective employees to search and apply for job opportunities, handling inquiries from our promoters, affiliates, distributors, vendors, and customers, or other instances where we have carried out a legitimate interests assessment and have established an existing legitimate interest;

the performance of a contract that we have in place with you;

your consent where appropriate; or

compliance with our legal obligations, including to meet national security or law enforcement requirements.



9.3 WHERE WE STORE YOUR PERSONAL INFORMATION

The data that we collect from you is stored on our servers or on servers provided by cloud service providers, such as Amazon Web Services. If you are a resident of the EEA, your Personal Information may be transferred within or outside the EEA to areas where privacy laws may be less strict than in the EEA (for such transfers of your Personal Information to our systems in the United States, we comply with the US-EU Privacy Shield Framework and Swiss-US Privacy Shield Framework as set forth here). By submitting your Personal Information, you agree to this transfer, storing, and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our Sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

In some cases, there is a legal requirement to keep Personal Information for a minimum period of time. Except in those circumstances, we do not keep your Personal Information for any longer than is necessary for the purposes for which the Personal Information was collected or for which it is to be further processed.

9.5 YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL INFORMATION

Subject to certain exceptions, you have the following rights with respect to your Personal Information:

To receive or access a copy of the Personal Information that we hold about you;

To request that any inaccurate or incomplete Personal Information be corrected or supplemented;

To have your Personal Information erased, unless we have a legitimate reason to retain the Personal Information (such as if we are required to do so for legal reasons); and

To ask us not to process your Personal Information for a particular purpose, including for marketing.

All of these rights are subject to certain conditions and exemptions. For example, A.V.A. will not be obligated to erase your Personal Information if we need to retain it to protect ourselves in the event of a legal claim.

To exercise any of these rights, please submit a written request to us using the contact information set forth below. The Company reserves the right to charge a fee in dealing with such a request as permitted by applicable law and regulations. You may also opt out of receiving additional marketing information by using the unsubscribe feature in any marketing email we send you.

10. CONDITIONS OF USE AND CHANGES TO OUR PRIVACY POLICY

If you choose to visit our Sites and attend our events, your visit and any dispute over privacy is subject to this Notice and our Terms of Use, including limitations on damages, resolution of disputes, and



application of the law of the Province of Quebec.

If you have any concern about our privacy practices, please contact us with a thorough description, and we will try to resolve it.

As our business changes, our Privacy Policy and Terms of Use may change also. We may e-mail periodic reminders of our notices and conditions, but you should check our Sites frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.

This Site is owned and operated by A.V.A.. If you have any questions or suggestions with respect to this Privacy Policy or our privacy practices, please e-mail us at contact@alexandravillarroel.com, or you can contact us by mail at:

A.V.A. Enterprises, Inc
50 Barnett P.O. Box
Montreal, QC H9G3C7

PIPEDA-SPECIFIC REQUESTS

Please submit PIPEDA-specific data requests through the procedures set forth in Section 8.

[Updated July 25, 2020]