

Policy on Privacy of Customer Personal Information (“Privacy Policy”)

Last updated May 1, 2019

Our commitment to privacy

Soma Wellbeing Inc. (operating as “Jolanta’s European Spa”) (the “**Corporation**”, “**we**”, “**our**”) is committed to protecting the privacy and security of your personal information obtained by reason of your customer relationship with the Corporation. This policy explains the types of customer personal information we collect, how it is used, and the steps we take to ensure that your personal information is handled appropriately.

By using <https://www.jolantasspa.com/> (our “**Website**”), our products or our services, you signify your consent to all of the terms and conditions of this Privacy Policy, and that of your parent or legal guardian if you are under the age of majority in your jurisdiction of residence. If you do not agree with any terms of this Privacy Policy, you must not use our website, products or services.

We reserve the right to modify this Privacy Policy at any time. We will indicate on this page the date this Privacy Policy was last updated. Your continued access to and/or use of our Website, products, and/or services after any such changes constitutes your acceptance of and agreement to be legally bound by this Privacy Policy, as revised. Please periodically review this Privacy Policy so that you know what personal information we collect, how we use it, and with whom we may share it.

What is personal information?

Personal information is information that refers to an individual specifically or information about an individual which is personally identifiable and is recorded in any form. Personal information includes such things as name, address, phone number, e-mail address, age, income, date of birth, ethnic origin and credit records.

Non-personal information is information which does not identify you as an individual. Publicly available information is also not considered personal information, such as, information displayed in public telephone directories where the subscriber can refuse to be listed, professional and business directories available to the public, public registries and other publicly available printed and electronic publications.

Use of personal information

The Corporation is responsible for all personal information under its control, including any personal information that is transferred to third parties for processing, storage or other purposes. We may collect and use your personal information for some or all of the purposes listed below. You will be deemed to consent to our use of your personal information for the purpose of:

- communicating with you generally;
- responding to your questions or inquiries;
- processing your product and service purchases;
- providing products and services requested by you;
- processing and keeping track of transactions and reporting back to you;
- protecting against fraud or error;
- conducting market research and surveys;
- conducting promotional activities, including contests;

- recommending products and services that the Corporation believes will be of interest to you;
- improving our products, services and Website;
- complying with legal and governmental requirements;
- fulfilling any other purpose that would be reasonably apparent to the average person at the time we collect it from you.

We may transfer your Personal Information to third party service providers that assist us with carrying out these purposes. For example, we may use third party service providers to facilitate payments.

We may also use or disclose your Personal Information to third parties if we have reason to believe that using or disclosing such information is necessary to: (i) conduct investigations of possible breaches of law; (ii) identify, contact, or bring legal action against someone who may be violating an agreement they have with us; (iii) investigate security breaches or cooperate with government authorities pursuant to a legal matter, for example, if we are subject to a subpoena, court order, or the information is requested by the police or another law enforcement entity; or (iv) to protect our rights, safety or property.

Otherwise, the Corporation will obtain your express consent (by verbal, written or electronic agreement) to collect, use or disclose your personal information for purposes other than as listed above. You can change your consent preferences at any time by contacting the Corporation. To change your preferences, refer to the "How to contact us" section below.

Collection of information

The Corporation collects only the information required to provide products and services to you. The Corporation will collect personal information only by clear, fair and lawful means.

We receive and store any information you enter on our Website or give us in any other way such as by phone, e-mail, on paper and in person. You can choose not to provide certain information, but then you might not be able to take advantage of our products, services or Website.

Information we collect automatically

Like many other websites, we also receive and store certain types of information whenever you interact with us online. For example, we use "cookies," and we obtain certain types of information when your web browser accesses our Website. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser, to enable our systems to recognize your browser and to provide features. This non-personal information is used for Website and system administration purposes.

The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the website of its manufacturer. Because cookies allow you to take advantage of some of our Website's essential features, we recommend that you leave them turned on.

Examples of the information we collect and analyze include, where applicable, the Internet protocol (IP) address used to connect your computer to the Internet; computer and connection information, such as browser type, version and timezone setting, browser plug-in types and versions, operating system, and platform; purchase history, which we may aggregate with similar information from other customers to create features such as "most popular" or "best selling" lists; the full Uniform Resource Locators (URL)

clickstream to, through, and from our website, including date and time; cookie numbers; products you viewed or searched for; and the telephone number used to call our customer service number. We may also use browser data such as cookies, Flash cookies (also known as Flash Local Shared Objects), or similar data on certain parts of our website for fraud prevention and other purposes. During some visits we may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. If you have created an account on our Website we also collect and store your e-mail address, login, and password.

Sharing your information

The Corporation does not disclose personal information to any organization or person for any reason, except the purposes listed below. If your personal information is shared with third parties, those third parties are bound by appropriate agreements with the Corporation to secure and protect the confidentiality of your personal information. You are deemed to consent to disclosure of your personal information for the following purposes:

- We may employ other companies and individuals to perform functions on our behalf. Information is shared with such companies and individuals only to the extent and for the purposes necessary to perform their functions, but they may not use it for other purposes. We may use service providers located outside of Canada, and, if applicable, your personal information may be processed and stored in other countries and therefore may be subject to disclosure under the laws of those countries.
- As we continue to develop our business, we might sell or buy stores, subsidiaries, or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise). Also, in the unlikely event that the Corporation or substantially all of its assets are acquired, customer information of course will be one of the transferred assets.

Retention of information

The Corporation retains your personal information only as long as it is required for our business relationship or as required by federal and provincial laws. You may request that we remove your information from our records. Subject to our requirements for continued retention of your information, for example, for billing, audit, or warranty purposes, we will make every reasonable effort to honour your request.

How can I access my information?

You may request access to the personal information we have on record in order to review and amend the information, as appropriate. In circumstances where your personal information has been provided by a third party, we will refer you to that party (e.g. credit bureaus). To access your personal information, refer to the "How to contact us" section below.

Upon receiving a request to access your personal information, the Corporation will:

- verify your identity;
- inform you about what type of personal information we have on record or in our control, how it is used and to whom it may have been disclosed;

- provide you with access to your information so you can review and verify the accuracy and completeness and request changes to the information; and
- make any necessary updates to your personal information.

The security of your personal information is a priority

We take steps to safeguard your personal information, regardless of the format in which it is held, including:

- physical security measures such as restricted access to our facility and locked filing cabinets
- electronic security measures for computerized personal information such as password protection, database encryption and personal identification numbers;
- organizational processes such as limiting access to your personal information to a selected group of individuals who are bound by and understand confidentiality obligations and this privacy policy;
- contractual obligations with third parties who need access to your personal information requiring them to protect and secure your personal information.

It is important for you to protect against unauthorized access to your password and your computer. Be sure to sign off when you have finished using any shared computer.

Links to other websites

Our Website may include third-party advertising and links to other websites. We do not provide any personally identifiable customer information to these advertisers or third-party websites. These external websites are not subject to this Privacy Policy and we have no control over the content or policies of these sites. Please carefully review the policies on these sites before providing them with any information.

Contact us

We are committed to providing you with understandable and easily available information about our policy and practices related to management of your personal information. We will respond in a timely manner to your questions, concerns and complaints about the privacy of your personal information and our privacy policies and procedures.

Call us at: 519-725-9999

Email us at: info@jolantaspa.com

Write to us at: Jolanta's European Spa
646 Erb St W, Unit #105
Waterloo, ON N2T 0A8

Policy changes

To accommodate changes in our service, the technology, and legal developments, this Privacy Policy may change over time. Whenever we update this Policy we will change the date on the Policy to indicate when the changes were made. You should check our Website frequently to see recent changes.