

PRIVACY POLICY

Lifeup International OÜ (“us” or “our” or “Company”) operates Canadian immigration online application services (“Service(s)”) as regulated by our terms (“Terms of Use” or “ToU”), which can be reviewed at: <https://canadaexpress.org/terms-of-use> This Privacy Policy (“Policy”) is an indispensable component of the Terms of Use and definitions contained therein shall have the same meaning as definitions used herein.

This Privacy Policy has been created to give thorough and clear explanation concerning the data we gather, the ways in which we utilize data that we gather, and our privacy procedures, in accordance with the General Data Protection Regulation (“GDPR”) of the European Union (EU), the California Consumer Privacy Act (“CCPA”) whenever relevant, and as mandated by the applicable privacy laws.

California Residents, please read our [CCPA Privacy Notice](#).

KINDS OF DATA GATHERED

We gather particular kinds of data whenever you browse or access or utilize the Services in any fashion and this data could be categorized in the following two ways:

1. Information That Is Personally Identifiable (“Personal Information” or “Personal Data”), subject to the legal definitions that apply, such as name, online identifiers, email address, as discussed further below.

2. Aggregated Data that Is Non-Identifiable (“Non-Personal Data”), such as particular aggregated data concerning your usage of the Services or technical data which is transmitted from the device you are utilizing.

Please note that the Company will not combine Non-Personal Data that is gathered with Personal Information that you give us voluntarily, but in the event these two kinds of data are combined, the combined data will be treated as Personal Information.

Feel free to review the information provided below that further discusses the kinds of data we gather whenever you utilize the Services offered on our website or whenever you browse our website, along with the reasons for gathering the information and the manner in which we utilize it.

Technical Data and Internet Protocol Address (IP)

Whenever you utilize our Services or access our website, we may gather Non-Personal Data that is technical in nature, such as the kind of Internet browser you are using, the operating system, date and time you accessed the website, kind of device you used, your estimated geographic location, click stream while on the website, language preference, or other Non-Personal Data.

Furthermore, whenever you make use of our Services or access our website, we will gather, either by third party service providers or directly, your Internet Protocol address (IP address). Please be aware that certain jurisdictions do not consider an IP address to be Personal Information; however, the European Economic Area (EEA) and many other jurisdictions do consider an IP address to be information that is personally identifiable. Consequently, such information is treated by the Company as Personal Information, in keeping with the laws that apply.

Reasons for Gathering Data and How It Is Utilized:

This data will be processed for several reasons, such as providing, managing, operating, protecting, maintaining, improving and customizing our website as well as the Services that the website offers. We may also gather and use data in order to audit and track traffic flow and statistics about usage, as well as for the purpose of remarketing, subject to your consent, where mandated by the applicable law, as explained below in the “Cookies” section.

Legal Basis According to the GDPR (for EU persons):

This information is processed in accordance with the consent you give via our notice about cookies.

Application Information

If you would like to receive Services from our Company, you will need to give us or an agent who is acting on behalf of our Company, certain information, which may include: your first name and last name, telephone number, email address, country of birth, date of birth, marital status, occupation, etc.

There are various methods in which you could provide us with your information, such as a telephone call, voicemail, entering your details in an application or form online operated by the Company, via email, social network, online chat, mail delivery, or other means.

Reason for Gathering Data and How It Is Utilized:

The reason we gather and process information that you enter in your application is so our Services can be provided to you.

Legal Basis According to the GDPR (for EU persons): Execution of a contract.

Contact Details

Our Company will gather and process the details that you give us (such as your name and email address) whenever you decide to contact us voluntarily for any purpose, such as questions you might want to ask or to receive assistance, using any method of available communication (for instance, mail, online form, email, etc.).

Reasons for Gathering Data and How It Is Utilized:

Your contact details and contact history will be processed by our Company in order to provide you with the service or support you have asked for and to respond to questions you may have. Furthermore, these details may be stored by our Company if we think it is in our legitimate interests, such as to defend legal claims made against our Company.

Legal Basis According to the GDPR (for EU persons): Execution of a contract.

Recorded Telephone Calls

Your telephone calls could be documented in writing and/or recorded if you contact us or an agent acting on behalf of our Company, and this could include when you contact our customer service representatives.

Reasons for Gathering Data and How It Is Utilized:

Telephone calls are processed and recorded for the purpose of providing our Services, preventing fraud, or monitoring the quality of services you receive.

Legal Basis According to the GDPR (for EU persons): Execution of a contract.

Payments Details

We will ask you to provide certain data such as the credit card number and other details if you make a payment for our offered Products or Services.

Reason for Gathering Data and How It Is Utilized:

This information will be used by our Company for the purpose of processing the payment to receive our Services.

Legal Basis According to the GDPR (for EU persons): Execution of a contract.

Newsletter and Marketing Materials

If you choose to register to receive our marketing materials, such as our newsletter, you will be asked to give us your email address and other details, such as your first name and last name, job title and the company you work for. Please note that our Company utilizes services provided by Upland for our email marketing.

Reason for Gathering Data and How It Is Utilized:

Our Company will only use this information so that marketing materials can be sent to you.

Legal Basis According to the GDPR (for EU persons):

If you signed up to receive our newsletter or other marketing materials, you gave your consent. Additionally, our Company has a legitimate interest to send you content and updates if you are our Customer or partner.

HOW WE GATHER YOUR INFORMATION

The information discussed above can be gathered automatically utilizing particular tracking technologies (such as pixels or cookies), or, voluntarily in the event that you contact us.

COOKIES POLICY

We utilize tracking technologies on our website, including pixels and cookies, which are used in order to collect data automatically, by service providers on our behalf or by ourselves.

Whenever you utilize our Services or access our website, small text files called "cookies" are installed by a web server on your computer's hard drive. Cookies help you to navigate our website or Services more efficiently, allow certain features to be activated automatically, make your interaction with our Services easier and faster, display the website content in the relevant language based on the country you're in, among other features, and are also used for the purpose of remarketing (which is discussed below).

To learn more about cookies, please visit: www.allaboutcookies.org

The majority of Internet browsers give you the option to get a warning before cookies are stored, to remove cookies from the hard drive of your computer or to block the acceptance of cookies. The instructions to do this are often found in the device preferences, security and privacy settings, "clear browsing history" tab or other locations on the device and/or browser. It is important to understand that if you decide to disable cookies, your experience online could be limited, since certain features might not operate correctly on our website without cookies.

Besides the cookies that we use to monitor the performance of our campaigns and to operate our website, we might also allow third parties to utilize certain tracking technologies, such as cookies, as discussed below.

Operation and Essential Functionality:

Source: Google Tag Manager

Reason: This cookie is required to load scripts into our website pages.

Privacy Policy/Opt Out:

<https://policies.google.com/privacy>
<https://policies.google.com/technologies/managing?hl=en>

Cookies Related to Performance and Analytics:

Sources: Google.com and Google Analytics

Privacy Policy/Opt Out:

google.com/policies/privacy/partners
<https://tools.google.com/dlpage/gaoptout>

Targeted Marketing:

Sources:

Facebook Remarketing
Google AdWords Remarketing

Privacy Policy/Opt Out:

<https://www.facebook.com/policies/cookies/>
<https://policies.google.com/privacy>
<https://policies.google.com/technologies/managing?hl=en>

Please note that you may be able to adjust the security and privacy settings on your Internet browser so that you may control the response of your browser to cookies. To learn more, you might review your browser's support or help page.

Furthermore, you might be able to opt out of cookies and browser-enabled, interest-based advertising from particular advertisers at the Digital Advertising Alliance's ("DAA") website – [DAA opt-out page](#) and at the Network Advertising Initiative's ("NAI") website – [NAI consumer opt-out](#).

THIRD PARTY DATA SHARING

Our Company does not share with third parties any of the **Personal Information** that we gather from you, with the following exceptions:

- 1. Legally Required** – In the event we are required by the applicable regulation, law, legal procedure, or government request (such as compliance with tax authorities or a court order, etc.), we may disclose your information in this type of situation.
- 2. Your Consent** – If you consent to a particular disclosure, we may share your information with third parties. Keep in mind that after we disclose your details to another company, those details will become subject to the privacy procedures of the other company.
- 3. Business Partners and Service Providers** – Our Company may share your details with third parties that provide services on our behalf, such as authorized immigration consultants, analytic services, etc.
- 4. Affiliated Companies and Corporate Transactions** – We might share your details with our parent company, our other subsidiaries, joint ventures, or any of our companies which are under common control with the Company ("**Affiliated Companies**") only when and if appropriate or required for the reasons explained in this Policy, along with any corporate transactions, such as a merger, consolidation, sale of a significant segment of our business, or asset sale. If such an event should occur, we will put forth our best efforts to make sure that our Affiliated Companies or acquiring company assumes the obligations and rights that this Policy describes.
- 5. Rights of Third Parties** – Our Company might disclose your details to prevent harm to the property (such as intellectual property), rights (such as legal rights), or safety of our Company, our users or any relevant third party.

We reserve the right to utilize, share or transfer (for business reasons or other purposes) processed and aggregated Non-Personal Data to third parties, including, *inter alia*, affiliates, for different reasons, such as commercial purposes. This data could be gathered, processed and evaluated by us and transferred to third parties in an aggregated, combined, collective fashion (for instance, your data is aggregated with other users immediately).

RETAINING DATA

Our Company retains the Non-Personal Data that we gather for as long as necessary to fulfill our contract with you, provide the Service, perform our business purpose, resolve disputes, enforce our agreements, comply with legal obligations that we have, in compliance and in accordance with the laws that apply, or until a person asks us to delete his/her Personal Information, as discussed earlier. Furthermore, we are entitled at our sole discretion and at any time to correct, restore or delete information that is inaccurate or incomplete.

INFORMATION SECURITY

We utilize administrative, technological and physical security measures for the Services that we believe comply with industry standards and applicable laws for the purpose of preventing unauthorized access to your information and to safeguard it from being lost accidentally, destroyed unlawfully, and improperly disclosed or used. You can read more about our Security Policy at: <https://canadaexpress.org/terms-of-use>

YOUR RIGHTS

Laws regarding data privacy and protection may give you the option to exercise certain rights related to your Personal Information that we hold (these laws may be different for various jurisdictions). You can learn more by reading our Privacy Policy and User Rights Policy. Additionally, you may fill out the Data Subject Request Form and send it to: support@canadaexpress.org

Please note that if you contact us and ask to exercise your rights concerning your Personal Information, there is particular information that we will require from you for the purpose of confirming your identity and in order to find your data, and please understand that the procedure to locate and delete the information could take a reasonable amount of time and effort, as allowed or required under applicable law.

Your jurisdiction might have data privacy and related laws that may give you extra or different rights related to the information we gather from you which might also apply.

In the event that you think your privacy was treated improperly or that it could have been harmed by a person's attempt to improperly use our website or Service, please contact us directly at: support@canadaexpress.org

TRANSFER OF YOUR INFORMATION

Our Company may process or store your data in the United States or in other countries. In the event that you are a resident of the European Economic Area (EEA), we will take appropriate steps to make sure that your data gets an adequate level of information security when it is transferred outside of the EEA. Please note that if you are a resident of a jurisdiction that requires your consent in order for your data to be transferred, this Policy includes your express consent for such transfer of your Personal Information.

CHILDREN

You warrant and represent that (1) you are over 18 years of age; and (2) you are of legal competence to enter into this Policy. Our Service is not intended for or directed to people who are less than 18 years of age and we do not knowingly gather or request information from them. In the event that we receive verifiable knowledge that a user is less than 18 years of age, our Company will take action to delete such user's Personal Information immediately. If you have reason to believe or become aware that a person is less than 18 years of age and has provided us with any information, please contact us at: support@canadaexpress.org

REVISIONS AND AMENDMENTS

We reserve the right to revise or amend this Policy from time to time and such modifications will become effective immediately upon the implementation of the revised or amended Policy on our website. We will make a reasonable effort to notify you in the event that we implement any modifications that significantly changes our privacy procedures. It is recommended that you periodically review this Policy to make sure that you understand our privacy procedures and to check for any revisions or amendments.

California Residents, please note: As required under the CCPA, notwithstanding the above, this Policy will be reviewed and updated every 12 months.

HOW TO REACH US

Please feel free to contact our Data Protection Officer at: support@canadaexpress.org