

# PRIVACY POLICY

**Effective Date:** 2025-June-17

**Last Updated:** 2025-June-17

## 1. INTRODUCTION

This Privacy Policy describes how AI-First Consulting ("we," "us," or "our") collects, uses, protects, and discloses your personal information when you visit our websites at (the "Sites"), engage with our services, or interact with us in other ways.

We are committed to protecting your privacy and complying with applicable privacy laws, including Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).

### Contact Information:

- **Email:** [sales@ai-first.ca](mailto:sales@ai-first.ca)
- **Phone:** +1(902) 233-8491
- **Privacy Officer:** [robert@ai-first.ca](mailto:robert@ai-first.ca)

## 2. ACCOUNTABILITY AND PRIVACY OFFICER

We have appointed a Privacy Officer who is responsible for ensuring compliance with this Privacy Policy and applicable privacy laws. Our Privacy Officer can be contacted at [robert@ai-first.ca](mailto:robert@ai-first.ca) for any privacy-related questions, concerns, or requests.

## 3. PERSONAL INFORMATION WE COLLECT

### 3.1 Information You Provide Directly

We collect personal information that you voluntarily provide to us, including:

#### Contact Form Information:

- Full name
- Email address
- Phone number

- Company/organization name
- Message content
- Any other information you choose to provide

**Newsletter Subscriptions:**

- Email address
- Name (optional)
- Communication preferences

**Survey Responses:**

- Responses to survey questions
- Demographic information (when applicable)
- Contact information (when provided)
- **Note:** We will clearly indicate whether survey responses are anonymous or identifiable at the time of collection

### **3.2 Information Collected Automatically**

When you visit our Sites, we may automatically collect:

**Technical Information:**

- IP address
- Browser type and version
- Device type and operating system
- Pages visited and time spent on pages
- Referring website
- Date and time of visits

**Cookies and Tracking Technologies:**

- Session cookies (essential for website functionality)
- Analytics cookies (with consent)

- Preference cookies (to remember your settings)

### **3.3 Information from Third Parties**

We may receive information about you from:

- Email marketing platforms (when you interact with our newsletters)
- Survey platforms and tools
- Analytics services
- Social media platforms (if you interact with our social media content)

## **4. HOW WE USE YOUR PERSONAL INFORMATION**

### **4.1 Primary Purposes**

We collect and use your personal information for the following purposes:

#### **Service Delivery:**

- Responding to your inquiries and providing requested services
- Delivering consulting services and project work
- Managing client relationships
- Processing payments and invoicing

#### **Communications:**

- Sending newsletters and updates (with your consent)
- Providing information about our services
- Responding to customer service requests
- Conducting surveys and research (anonymous or identifiable as disclosed)

#### **Business Operations:**

- Analyzing website usage and improving our Sites
- Conducting internal research and analysis
- Maintaining and improving our services

- Ensuring security and preventing fraud

#### **Legal and Compliance:**

- Complying with legal obligations
- Protecting our rights and interests
- Responding to legal requests

## **4.2 Consent Requirements**

**Express Consent:** We obtain express consent for:

- Newsletter subscriptions and email marketing
- Participation in surveys with identifiable information
- Use of non-essential cookies
- Marketing communications

**Implied Consent:** We may rely on implied consent for:

- Essential website functionality cookies
- Communications necessary to provide requested services
- Information needed to complete transactions

## **5. LEGAL BASIS FOR PROCESSING**

Under PIPEDA, we process your personal information based on:

- Your explicit consent
- Performance of services you have requested
- Legitimate business interests (where appropriate)
- Legal obligations and requirements

## **6. HOW WE SHARE YOUR PERSONAL INFORMATION**

### **6.1 Service Providers and Partners**

We may share your personal information with trusted third-party service providers who assist us in:

- Website hosting and maintenance
- Email marketing services (e.g., Mailchimp, Constant Contact)
- Survey platforms and tools
- Analytics services (e.g., Google Analytics)
- Payment processing
- Cloud storage and data backup

All service providers are contractually required to protect your information and use it only for the specified purposes.

## **6.2 Legal Requirements**

We may disclose your personal information when required by law or in response to:

- Court orders, subpoenas, or other legal processes
- Requests from law enforcement or government agencies
- Investigations of suspected illegal activities
- Protection of our rights, property, or safety

## **6.3 Business Transfers**

In the event of a merger, acquisition, or sale of assets, your personal information may be transferred to the acquiring entity, subject to the same privacy protections.

## **7. INTERNATIONAL TRANSFERS**

Your personal information may be stored and processed in Canada or other countries where our service providers operate. When we transfer information outside of Canada, we ensure appropriate safeguards are in place to protect your information in accordance with Canadian privacy laws.

## **8. DATA RETENTION**

We retain your personal information only as long as necessary to fulfill the purposes for which it was collected:

**Contact Information:** Retained for 7 years after last contact for business and legal purposes

**Newsletter Subscriptions:** Maintained until you unsubscribe

**Survey Data:** Retained as specified at the time of collection (typically 2-5 years)

**Website Analytics:** Aggregated data retained indefinitely; individual data for 26 months

**Financial Records:** Retained for 7 years as required by law

When personal information is no longer needed, we securely delete or anonymize it.

## **9. SECURITY SAFEGUARDS**

We implement appropriate technical, administrative, and physical safeguards to protect your personal information:

### **Technical Safeguards:**

- Encryption of data in transit and at rest
- Secure servers and databases
- Regular security updates and patches
- Access controls and authentication

### **Administrative Safeguards:**

- Privacy training for staff
- Access restrictions on a need-to-know basis
- Regular security audits and assessments
- Incident response procedures

### **Physical Safeguards:**

- Secure office facilities
- Locked storage for physical documents
- Controlled access to equipment and files

## **10. YOUR PRIVACY RIGHTS**

Under Canadian privacy laws, you have the following rights:

### **10.1 Access Rights**

You have the right to:

- Know what personal information we hold about you
- Request access to your personal information
- Receive a copy of your personal information in a commonly used format

## **10.2 Correction Rights**

You have the right to:

- Request correction of inaccurate or incomplete information
- Update your contact information and preferences

## **10.3 Consent Withdrawal**

You have the right to:

- Withdraw consent for newsletter subscriptions at any time
- Opt out of non-essential cookies
- Request deletion of your information (subject to legal requirements)

## **10.4 How to Exercise Your Rights**

To exercise your privacy rights, contact our Privacy Officer at **robert@ai-first.ca**

**Response Time:** We will respond to your request within 30 days of receipt.

**Verification:** We may require verification of your identity before processing your request.

**No Fee:** There is no fee for reasonable requests, though we may charge for excessive or repetitive requests.

# **11. COOKIES AND TRACKING TECHNOLOGIES**

## **11.1 Types of Cookies We Use**

**Essential Cookies:** Required for basic website functionality (no consent required)

**Analytics Cookies:** Help us understand how visitors use our site (consent required)

**Preference Cookies:** Remember your settings and preferences (consent required)

## **11.2 Managing Cookies**

You can control cookies through your browser settings:

- **Accept All Cookies:** Allow all cookies for full functionality
- **Reject Non-Essential Cookies:** Block analytics and preference cookies
- **Browser Settings:** Configure your browser to block or delete cookies

Note: Disabling essential cookies may affect website functionality.

## **12. EMAIL MARKETING AND CASL COMPLIANCE**

Our email marketing practices comply with Canada's Anti-Spam Legislation (CASL):

**Express Consent:** Required for all newsletter subscriptions

**Clear Identification:** All emails clearly identify our organization

**Unsubscribe Mechanism:** Easy opt-out in every email

**Consent Records:** We maintain records of how and when consent was obtained

### **To Unsubscribe:**

- Click the unsubscribe link in any email
- Email us at [sales@ai-first.ca](mailto:sales@ai-first.ca)
- Contact our Privacy Officer

## **13. SURVEY DATA COLLECTION**

When conducting surveys, we will:

- Clearly state whether responses are anonymous or identifiable
- Explain the purpose of the survey
- Indicate how long data will be retained
- Obtain appropriate consent based on the type of information collected
- Comply with PHIA requirements when health information is involved

**Anonymous Surveys:** No personal identifiers collected or stored

**Identifiable Surveys:** Personal information collected with express consent

## **14. PRIVACY BREACH PROCEDURES**

In the event of a privacy breach:

**Assessment:** We assess whether the breach poses a real risk of significant harm

**Notification:** If there is a real risk of significant harm, we will:

- Report to the Office of the Privacy Commissioner of Canada within 72 hours
- Notify affected individuals as soon as feasible
- Notify other organizations that may help reduce harm

**Breach Records:** We maintain records of all breaches for 24 months

## **15. CHILDREN'S PRIVACY**

Our services are not directed to children under 13 years of age. We do not knowingly collect personal information from children under 13. If we become aware that we have collected such information, we will take steps to delete it promptly.

## **16. CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time to reflect:

- Changes in our practices
- Updates to applicable laws
- New service offerings
- Feedback from privacy authorities

**Notification:** We will notify you of material changes by:

- Posting an updated policy on our website
- Sending email notification to newsletter subscribers
- Providing 30 days' notice before changes take effect

**Effective Date:** Changes become effective on the date specified in the updated policy.

## **17. COMPLAINTS AND DISPUTE RESOLUTION**

If you have concerns about our privacy practices:

**Step 1:** Contact our Privacy Officer at robert@ai-first.ca

**Step 2:** If unresolved, you may file a complaint with:

**Office of the Privacy Commissioner of Canada**

- Website: [www.priv.gc.ca](http://www.priv.gc.ca)
- Phone: 1-800-282-1376
- Email: [info@priv.gc.ca](mailto:info@priv.gc.ca)

**Nova Scotia Information and Privacy Commissioner** (for health information):

- Website: <https://oipc.novascotia.ca>
- Phone: (902) 424-4684
- Email: [oipc@novascotia.ca](mailto:oipc@novascotia.ca)

## **18. CONTACT INFORMATION**

For privacy-related questions, concerns, or requests:

**Privacy Officer:**

Email: robert@ai-first.ca

Phone: +1 (902) 233-8491

**General Inquiries:**

Email: sales@ai-first.ca

Website: <https://ai-first.ca>

**This Privacy Policy was last updated on June 17, 2025 and is effective as of June 17, 2025.**

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