



Privacy Policy

Background

Boundless Life understands that trust is fundamental within our community and, as such, are committed to upholding the privacy of personal information we collect from individuals who visit our website or use our services. This document explains how we collect, use and store your personal information.

We understand that your privacy is important to you and want you to be confident about how we use your personal information, but to also be aware of your rights in this regard. We respect and value the privacy of all our members and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under law.

Please read this Privacy Policy carefully and ensure that you understand it. If you have any questions, please contact us using the details in the 'Who we are and how to contact us' section.

Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"Cookie"

means a small text file placed on your computer or device by our websites when you visit certain parts of our websites and/or when you use certain features of our website. Details of the Cookies used by our website are set out in our 'Cookie Policy';

Data Controller

means the person or entity which alone or jointly with others determines the purposes and means of the processing of personal data;



Data Protection Law

Personal Information Protection and Electronic Documents Act, SC 2000, c 5 or any substantially similar provincial legislation and General Data Protection Regulation, Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

“Personal information”

means any and all information that relates to an identifiable person who can be directly or indirectly identified from that information. In this case, it means personal data that you give to us directly or provide/agree to provide via our websites. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”);

“You/Your”

means anyone whose personal information we may collect including:

- anyone seeking to obtain information from us regarding our service offering and anyone named during this process
- anyone seeking to enrol a child at one of our Boundless Education Centres and anyone named during this process
- anyone actively utilising our services and anyone they nominated as an ‘Emergency Contact’ where applicable
- anyone who participates in the provision of feedback to us.



Who we are and how to contact us

The Data Controller of your personal information is Boundless Hospitality Corp. (hereafter referred to as "Boundless"), a corporation registered under the Canada Business Corporations Act under Corporation Number 1323823-7, and whose registered office address is c/o Simplex Legal LLP, 445 Boulevard Pierre-Bertrand, Québec QC G1M 2A8, Canada.

You can contact Boundless Life's Data Protection Contact by emailing hello@boundless.life

What information do we collect?

We only ask for information that we need and have strict controls in place to keep it safe. We collect your personal information to provide the best possible experience for you and your family.

Personal information we collect may be held in paper or digital form.

We may collect some or all of the following personal and non-personal data (please also see our Cookie Policy for details regarding the use of Cookies and similar technologies):

- basic personal details including your name, date of birth, address;
- your payment details such as payment card details including any inherent identity verification;
- contact information such as email addresses and telephone numbers;
- relevant information about all individuals using Boundless services and Boundless Education including medical history where this is necessary to keep you safe, for example, details of any allergies;
- details of any accessibility requirements so that we may make reasonable adjustments to help you;
- log data and device information such as details about how you've used our websites (www.boundless.life and <https://bali.boundless.life>) and/or



- Community Platforms (including whether you clicked on links to third party services), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash and error data, cookie data, and the pages you've viewed or engaged with before or after using any Boundless platforms. We may collect some of this information even if you haven't begun to use Boundless' services.

We may request relevant information when you:

- ask for more information about the services Boundless offers / join our Mailing List;
- submit an application form, registration form and/or take part in an enrolment interview in order to enrol a child with Boundless Education;
- ask us a question and we provide a response;
- make a payment;
- update your details;
- register a complaint or provide feedback;
- take part in market research;
- update your preferences in regard to marketing.

Please note – This Privacy Policy applies only to your use of our website and services. These may contain links to other external websites. Please note that we have no control over how your data is collected, stored, or used by these other websites and we advise you to check the Privacy Policies of any such websites before providing any personal data to them.

Other information that we collect that may contain personal information

Meta Insights.

We may use data connected with Meta platforms e.g. Instagram, Facebook, Facebook groups, Facebook Pages, and other Facebook related entities. We will only use tools and data to the extent to which Facebook provides to



administrators and moderators of pages and groups. Please refer to Meta's own policies.

Google Analytics.

We may use Google Analytics to help analyse use of our website. Google Analytics uses tools to gather information such as how often users visit the website, what pages they visit, and what other sites they used before landing on our website. We use the information we get from Google Analytics to improve our website. Google Analytics only collects the IP address assigned to you on the date you visited the website, rather than taking your name or other identifying information.

Websites and apps used to keep you updated of your child's progress

We use third party platforms (including Bulb and Kindiedays) to keep you updated. Please refer to their Privacy Policies for details of how your data may be used when you access their platforms.

Authorising someone to talk to us about or act on your Boundless agreement

Boundless will not divulge any of your personal information nor speak to someone else about your application or agreement with us, and / or take any action on your agreement without obtaining your prior written consent

Where you provide consent, we share your information as described at the time of consent, such as when authorising a third-party application or website to access your Boundless account or participating in promotional activities by Boundless partners or third parties.

Where permissible with applicable law, we may use certain information about you, such as your email address, anonymise it, and share it with social media platforms, to generate leads and drive traffic to Boundless or otherwise promote our products and services.



How do we use and share your personal information?

All personal data is processed and stored securely, for no longer than is necessary considering the reason(s) for which it was first collected. We will comply with our obligations and always safeguard your rights.

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests*. Specifically, we may use your data for the following purposes (our legal basis for processing personal information):

- develop, improve, and personalise our products and services;
- enhance our customer service, experience, and relationship (e.g., customer and market research, business analysis, provide relevant product and service information);
- improve the relevance of our advertising and marketing campaigns;
- develop and improve our administration, security systems, website(s) and applications;
- share it with third parties in the event of organisational change (e.g., if we bought or merged with another organisation);
- to provide information and administer your Boundless account to fulfil our contract with you. This includes sharing information with, and obtaining information from, relevant external service providers;
- to fulfil our legal and regulatory obligations;
- to provide you with relevant marketing information where you have provided consent for this;
- to process payments securely. If you use a payment card to make a payment, we receive a unique transaction code and an extract of your card number only. This is stored to provide a record of the transaction;

*Legitimate Interest means the interest of our business in conducting and managing ourselves to enable us to give you the best products, services and customer experience. We make sure we consider and balance any potential



impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests and have conducted a 'Legitimate Interests Assessment' (LIA) to facilitate this. This will be repeated at least every 2 years. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us. Please refer to the 'Who we are and how to contact us' section if you wish to do so.

Your personal information rights

As a 'data subject', you have the following rights, which this Policy and our use of personal data have been designed to uphold:

- the right to be informed about how we collect and use your personal information;
- to access the personal information we hold about you (the right to access / data subject access request). Please note, no fee is payable for this;
- to correct personal information we hold that is incorrect or incomplete (the right to rectification);
- to have your personal information deleted (the right to be forgotten);
- to restrict us processing your personal information (the right to restrict);
- receive your personal information in a portable format to re-use with another service or organisation (right to portability);
- to object to us processing your personal information for particular purposes (the right to object);

If you consider that the processing of personal information by Boundless is not in compliance with data protection laws and regulations, you may lodge a complaint with Boundless and/or the Information Commissioner of Canada Office by following this link: <https://www.oic-ci.gc.ca/>



You can contact Boundless' Data Protection Contact by email at hello@boundless.life

How long do we keep your personal information?

We only keep your personal data for as long as we need to in order to use it as described above in the 'How do we use and share your personal information' section, and/or for as long as we have your permission to keep it.

Other ways you can control use of your personal information

In addition to your rights set out in the 'Your personal information rights' section, when you submit personal information to us, you may choose to restrict our use of your information. In particular, we aim to give you strong controls on our use of your information for discretionary direct marketing purposes (including the ability to opt-out of receiving emails from us, which you may do by unsubscribing using the links provided in our emails. You can also update your marketing preferences when you first contact us or at any point thereafter.

Communicating with us

When you contact us, personal information that you give us will be recorded. This helps us optimise our customer service, train and develop our staff and respond to complaints.

You can get this document from us in alternative languages or formats – including Braille, large print or audiotape by contacting us.

Changes to our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website. We recommend that you check this page regularly to keep up-to-date.



OPT OUT

Please email hello@boundless.life in order to discontinue receiving marketing emails and being a data subject. You can also utilise the 'Unsubscribe' option embedded within our marketing emails.