THE CONSERVATORY GROUP PRIVACY POLICY

At The Conservatory Group, we value your business and respect your right to privacy. We want you to feel secure about any private information that you provide to us, and have therefore outlined our Privacy Policy below. This Privacy Statement has been adopted by The Conservatory Group and by those organizations using the Conservatory Group trademarks under license from The Conservatory Group (referred to as "The Conservatory Group"), in order to demonstrate their commitment to the protection of individual privacy. The following discloses the personal information collection, use and disclosure practices of Conservatory Group. For the purposes of this Statement, "personal information" means information that is personally identifiable to individuals. "Non-identifiable information" means information that cannot be associated with or traced back to specific individuals with any certainty.

1. HOW AND WHEN THE CONSERVATORY GROUP COLLECTS PERSONAL INFORMATION

The Conservatory Group collects personal information from individuals on a voluntary basis through surveys, contest entry forms, registration forms, questionnaires and transaction documents both online and offline. The personal information includes contact information (for example, name, mailing address, e-mail address, telephone number), demographic information, household information, preference information and transaction-related information.

2. USE OF PERSONAL INFORMATION BY THE CONSERVATORY GROUP

The Conservatory Group uses personal information that it collects for the following:

- To communicate with individuals.
- To understand individual needs.
- To promote and offer products, services and special offers that meet individual needs or that might be of interest to individuals based on information provided and approved by The Conservatory Group.
- To provide individuals with products or services that are requested or that are part of The Conservatory Group's ongoing service with its customers.
- To conduct, process and complete transactions with The Conservatory Group customers.

The information also enables us to develop and customize our products and services to better meet the needs and preferences of customers. The Conservatory Group may, from time to time, contact individuals by electronic format, regular mail or telephone for any of the purposes set out above.

3. DISCLOSURE OF PERSONAL INFORMATION BY THE CONSERVATORY GROUP

The Conservatory group does not sell, rent or trade personal information that it collects. The Conservatory Group will not knowingly disclose personal information to any third parties except in the following circumstances:

- When The Conservatory Group has received consent to do so or under limited circumstances specifically described at such time as personal information is collected;
- When The Conservatory Group, in good faith, believes the law permits or requires such disclosure, including the providing of statistical information to industry groups or as required by any court or legal process.
- To affiliated and associated companies within The Conservatory Group of companies and only for the purposes described in Paragraph 2 above. These affiliated and associated companies and their respective employees are restricted from using the personal information for any purpose other than that described in Paragraph 2 above;
- To its agents, professional advisors, promotional and marketing agencies, and to any other Third Parties in order to complete transactions, to process data and to service customers. These Third Parties and their respective employees are only provided with such personal information as is necessary to perform the services for which they have been contacted and are restricted from using the personal information for any other purpose other than as described in Paragraph 2 above.

In the event of the sale of The Conservatory Group or assets of The Conservatory Group, personal information may be one of the transferred business assets.

4. RETENTION OF PERSONAL INFORMATION BY THE CONSERVATORY GROUP

At such time as personal information is no longer required for the purposes stated in this Privacy Statement or other statutory requirements, such personal information will be made anonymous or destroyed.

5. COLLECTION, USE AND DISCLOSURE OF NON-IDENTIFIABLE INFORMATION

a. The Conservatory Group collects and uses Non-Identifiable Information to assess the effectiveness of website content and traffic. This allows The Conservatory Group to improve the quality of visits to websites managed by it by streamlining visitors' ability to navigate these sites and developing featured programs and content that will be of interest to visitors. Aggregate non-identifiable information is used to perform statistical analyses of the collective characteristics and behaviour of individuals, and to measure demographics and interests.

b. The Conservatory Group also uses aggregate non-identifiable information it collects to inform its current and prospective sponsors and advertisers about the number of visits to its websites, the demographic characteristics of these visitors and the number of times visitors have viewed and "clicked" on their advertisement(s). The Conservatory Group also discloses to advertisers the overall demographics available regarding visitors who "clicked" on their advertisement. Aggregate non-identifiable information may be used to describe The Conservatory Group services and products to third parties such as prospective business partners and financial institutions. In any of these circumstances, only non-identifiable information in an aggregate form and not personal information is disclosed.

6. WEB SITES OPERATED BY THIRD PARTIES

Web sites operated by The Conservatory Group may contain links to other web sites that may collect personal information. This Statement does not extend to the data collection, disclosure, use and retention practices of such third parties and The Conservatory Group does not assume any responsibility for the privacy practices, policies or actions of such third parties. Individuals should read the privacy policies of such third parties, and make an informed decision whether or not to visit such websites and/or provide personal information to such third parties based upon their privacy practices and individual discretion.

7. SAFEGUARDING PERSONAL INFORMATION

The Conservatory Group has taken measures to protect the security and confidentiality of personal information as are appropriate in the circumstances. Personal information is stored in confidential databases and locations in the Greater Toronto Area. These sites have appropriate security measures in place to protect against the loss, misuse and alteration of personal information under the care and control of The Conservatory Group. Any information transmitted via the Internet, however, may be intercepted by third parties. The Conservatory Group does not assume any liability for interception, alteration or misuse of information transmitted over the Internet. The Conservatory Group employees are restricted from using and disclosing personal information collected by The Conservatory Group other than in accordance with this Statement.

8. ACCESSING PERSONAL INFORMATION
Individuals have the right to access, verify and correct or amend all of their personal information collected by The Conservatory Group. The Conservatory Group believes that it is imperative that personal information be as accurate, complete and up to date as is necessary for the purposes for which it is collected. Accordingly, to help The Conservatory Group keep personal information as current as possible, The Conservatory Group encourages individuals to amend inaccuracies and make corrections in their personal information collected by The Conservatory Group as often as necessary. To access, verify and correct or amend personal information, please send to the Privacy Officer at The Conservatory Group at 90 Tiverton Court, Ste 200, Markham, Ontario, L3R 9V2.

9. HOW TO FILE A COMPLAINT
To file a complaint with The Conservatory Group concerning the collection, use and/or disclosure of personal information, please send an e-mail to the Privacy Officer at The Conservatory Group or call (905)-477-7609.
All complaints will be investigated by The Conservatory Group Privacy Officer as soon as is practical in the circumstances. Individuals will be notified of the outcome of the investigation of complaints clearly and promptly and will be notified of any relevant steps taken or to be taken as a result of a complaint.

10. THE CHOICE TO PROVIDE PERSONAL INFORMATION OR TO RECEIVE CERTAIN INFORMATION AND PROMOTIONAL MATERIALS
Individuals always have the choice whether or not they wish to supply The Conservatory Group with personal information. Individuals wishing to "opt out" of receiving certain informational and promotional materials from The Conservatory Group or who otherwise object to the collection, use and disclosure policies as provided under this Privacy Statement, are asked to contact the Privacy Officer at The Conservatory Group at 90 Tiverton Court, Ste 200, Markham, Ontario, L3R 9V2 or call (905) 477-7609.
Opt-out opportunities are also provided in other circumstances such as in certain promotional mailings. Individuals are reminded that the decision to withhold personal information or to object to the use and/or disclosure of personal information as provided in this Privacy Statement or in any agreement between such individuals and The Conservatory Group may, in certain circumstances, limit their ability to complete purchases of The Conservatory Group products and services and limit their ability to access or take advantage of certain promotions and features.
Your personal information is obtained and used only with your consent that may be expressed or implied depending on the circumstances.

11. EFFECTIVE DATE OF STATEMENT
This Statement has been adopted by The Conservatory Group as of December 2026.
Revisions to the Statement will be posted as soon as practical.

ACCESSIBILITY POLICY & MULTI-YEAR PLAN

This accessibility plan outlines the policies and actions that The Conservatory Group will put in place to improve opportunities for people with disabilities.

STATEMENT OF COMMITMENT
The Conservatory Group is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA") and Ontario's accessibility laws.

ACCESSIBLE EMERGENCY INFORMATION
The Conservatory Group is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

TRAINING
The Conservatory Group will provide training to employees, volunteers and other staff members on Ontario's accessibility laws and on Ontario's Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.

- The Conservatory Group provides employees with the training needed to meet Ontario's accessibility laws.
- The Conservatory Group trains every person as soon as practicable after being hired and provides training in respect of any changes to the policies.
- The Conservatory Group keeps records of the training provided, including the dates on which the training was provided and the number of individuals to whom it was provided.

KIOSKS
In the event The Conservatory Group ever obtains self-serve kiosks, The Conservatory Group will train its employees to consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks.

INFORMATION AND COMMUNICATIONS
The Conservatory Group is committed to meeting the communication needs of people with disabilities. We will communicate with people with disabilities to determine their information and communication needs.
The Conservatory Group has taken the following steps to make all new websites and content on those sites conform with WCAG 2.0, Level A on and after January 1, 2014:
- IT will ensure that all new websites and content on those sites conform with WCAG 2.0, Level A; and
- IT will assess the current website to prepare for future compliance requirements.

The Conservatory Group has taken the following steps to ensure existing feedback processes are accessible to people with disabilities upon request on and after January 1, 2015:
- IT will ensure feedback processes for accessibility matters include all Integrated Accessibility Standard components; and
- The Conservatory Group will provide various feedback options (including by way of telephone, fax, email and regular mail).
- The Conservatory Group will consider other methods of feedback if required to ensure accessibility.

The Conservatory Group has taken the following steps to make sure all publicly available information is made accessible upon request on and after January 1, 2016:

- The appropriate department, with the assistance of Human Resources, will provide accessible formats and communication supports upon request in a timely manner.

The Conservatory Group has taken the following steps to make all websites and content conform with WCAG 2.0, Level AA on and after January 1, 2021:

- The IT Department will work with the Human Resources department to ensure that our public website is accessible; and
- AODA compliance will be included as one of the main criteria when selecting technology vendors for new website development.

EMPLOYMENT

The Conservatory Group is committed to fair and accessible employment practices. The Conservatory Group will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.

- Prospective applicants will be advised of the availability of accommodations by the Hiring Manager or Human Resources and that The Conservatory Group is an AODA-friendly environment;
- Hiring Manager or Human Resources will inform employees of policies for accommodating employees with disabilities when making offers of employment; and
- Hiring Manager or Human Resources will notify employees of the ability to provide accommodations on job postings.

On January 1, 2016, The Conservatory Group took the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Human Resources will develop a written process for individual accommodation plans, which may consider the following;
- How the employee can participate;
- How the employee will be assessed;
- How The Conservatory Group can use third parties if required in order to assist in determining if/how the accommodation can be achieved;
- How the employee information will remain private;
- How often the plan will be reviewed and updated;
- How the reasons for denied requests will be communicated; and
- How the plan will be provided to the employee

On January 1, 2016, The Conservatory Group took the following steps to ensure the accessibility needs of employees with disabilities are taken into account if using performance management, career development, and/or redeployment processes:

- Management will inform employees of the policies available to support employees with disabilities, such as policies on the provision of job accommodations. Applicable policies will be applied to ensure that employees' needs due to disability are taken into account in the application of performance management, career development, and/or redeployment processes.

On January 1, 2016, The Conservatory Group took the following steps to prevent and remove other accessibility barriers identified:
The Conservatory Group will assess, review, and alter (if required) policies and procedures on a frequent basis to ensure compliance with the AODA.

DESIGN OF PUBLIC SPACES

The Conservatory Group will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces, if ever applicable.

In the event of a service disruption that impacts accessibility in public spaces, The Conservatory Group will notify the public of the service disruption and, when available, provide alternatives.

POLICY REVIEW

The Conservatory Group will review and update this policy at least once every five years. This Policy was reviewed and updated in November 2023.

FOR MORE INFORMATION

For more information on this accessibility plan, please contact Anamaria Petrec at:

- Phone: 905-477-7609
- Email: ana@conservatorygroup.com

Accessible formats of this document are available free upon request.