



# LightHouse Counselling and Wellness – Privacy Policy

**Applies To:** All Therapists, Administrative, and Leadership Staff

**Approved By:** Clinic Owner and Operations Manager

**Effective Date:** January 2026

**Review Cycle:** Annually

**Next Review Date: January 2027**

## 1. Purpose

The purpose of this Privacy Policy is to outline how LightHouse Counselling and Wellness (“LightHouse”) collects, uses, stores, and discloses personal information in accordance with applicable privacy legislation. This policy is intended to protect the privacy, confidentiality, and security of personal information collected through LightHouse’s website and digital platforms, while ensuring transparency and accountability in data practices.

This Privacy Policy is intended to comply with applicable Canadian privacy legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA), the Personal Health Information Protection Act, 2004 (PHIPA) where applicable, and Canada’s Anti-Spam Legislation (CASL).

## 2. Policy Statement

LightHouse Counselling and Wellness is committed to safeguarding the privacy of individuals who interact with its website and online services. Personal information is collected, used, retained, and disclosed only for legitimate business purposes and in

compliance with applicable privacy laws. LightHouse takes reasonable steps to protect personal information against unauthorized access, disclosure, loss, or misuse and does not sell personal information.

### **3. Scope**

This policy applies to personal information collected through LightHouse's website and online services. It does not apply to information collected through in-person services, clinical care, events, supervision, coaching calls, or social media platforms.

The LightHouse website and general email communications are not intended for the transmission of urgent or sensitive clinical information.

Individuals requiring immediate support should contact emergency services or appropriate crisis resources.

### **4. Definitions**

#### **4.1 Personal Information**

Information that can identify an individual, including but not limited to name, email address, phone number, mailing address, geographic location, purchase history, payment information, and website usage data.

#### **4.2 Sensitive Data**

Information relating to race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, health information, genetic or biometric data, sexual orientation, or criminal history.

### **5. Collection of Personal Information**

LightHouse may collect personal information when individuals:

- Visit or interact with the website
- Register for services or make purchases
- Submit contact forms or communicate electronically
- Participate in surveys, contests, or promotions
- Interact with website features, cookies, or analytics tools

Where possible, individuals may browse the website anonymously.

## 6. Categories of Personal Data

LightHouse may process the following categories of personal data:

- **Communication Data:** Information shared through email, contact forms, text messages, or other digital communication.
- **Customer Data:** Information related to purchases, billing, and contact details.
- **User Data:** Information about website usage and engagement.
- **Technical Data:** IP address, browser type, device information, page views, navigation paths, and analytics data.
- **Marketing Data:** Preferences regarding marketing communications and consent status.

Personal information is collected, used, and disclosed only with meaningful consent and for purposes that a reasonable person would consider appropriate in the circumstances, in accordance with Canadian privacy law.

## 7. Sensitive Data

LightHouse does not intentionally collect or process sensitive personal data through its website or online platforms.

## 8. Use of Personal Information

Personal information may be used to:

- Operate, maintain, and improve the website
- Respond to inquiries and service requests
- Process transactions and payments
- Communicate with users
- Deliver marketing communications where lawful
- Ensure website security and functionality

## **9. Marketing Communications**

LightHouse may send marketing communications where consent has been provided or where permitted by law. Individuals may opt out of marketing communications at any time using the unsubscribe link in emails or by contacting [admin@lighthousecw.ca](mailto:admin@lighthousecw.ca). Opting out does not affect transactional or service-related communications.

## **10. Disclosure of Personal Information**

Personal information may be disclosed to:

- Service providers supporting website and business operations
- Professional advisors such as legal, accounting, or insurance professionals
- Government or regulatory bodies where legally required
- Third-party technology and advertising platforms supporting LightHouse operations

All third parties are required to maintain confidentiality and protect personal information in accordance with applicable laws.

## **11. Data Security**

LightHouse implements reasonable administrative, technical, and physical safeguards to protect personal information, including secure servers, encryption, and restricted access to authorized personnel.

## **12. Data Retention**

Personal information is retained only for as long as necessary to fulfill its intended purpose or to comply with legal, accounting, or regulatory requirements. Where appropriate, data may be anonymized for research or statistical purposes.

## **13. International Data Storage**

Some third-party service providers used by LightHouse may store or process personal information outside of Canada, including in the United States or other jurisdictions.

Personal information stored in other countries may be subject to the laws of those jurisdictions.

LightHouse takes reasonable steps to ensure service providers maintain appropriate privacy and security safeguards consistent with Canadian privacy standards.

## **14. Children's Information**

LightHouse does not knowingly collect personal information directly from children under the age of 16 through its website without parental or guardian involvement. If personal information of a minor is believed to have been submitted without appropriate consent, please contact LightHouse so the information can be removed.

## **15. Data Breach Response**

In the event of a privacy breach involving personal information, LightHouse will take reasonable steps to:

- contain and investigate the breach
- notify affected individuals where there is a real risk of significant harm, in accordance with applicable law
- notify regulatory authorities where legally required
- implement corrective measures to reduce the risk of recurrence

## **16. Cookies and Website Analytics**

LightHouse uses cookies and analytics tools to enhance website performance and understand user engagement. Users may adjust browser settings to limit or disable cookies, recognizing that some website features may be affected.

## **17. Third-Party Links**

The LightHouse website may contain links to external websites. LightHouse is not responsible for the privacy practices or content of third-party sites.

## **18. Access, Correction, and Privacy Concerns**

Individuals may request access to, correction of, or deletion of their personal information, or raise concerns regarding data use, by contacting [admin@lighthousecw.ca](mailto:admin@lighthousecw.ca).

Privacy requests may also be directed to the LightHouse Privacy Officer at:

Email: [agreenwood@lighthousecw.ca](mailto:agreenwood@lighthousecw.ca)

Mailing Address: 1380 Upper Canada Street, Unit 202, Kanata, ON, K2T0N7

## **19. Consent**

By using the LightHouse website, individuals consent to the collection and use of personal information as described in this policy.