

ELEVATE WELLNESS & PERFORMANCE CO. INC.

PRIVACY POLICY

Website, booking services, memberships, facility visits and communications | Ontario, Canada

Effective / Last Updated: September 3, 2026

Elevate respects your privacy. We collect only the Personal Information reasonably needed to provide our services, support participant safety, process transactions, communicate with you and meet our legal obligations. We do not sell or rent Personal Information.

Privacy at a Glance

- **Your choices:** Marketing is optional. You may unsubscribe or withdraw consent, subject to legal and contractual limits.
- **Sensitive information:** Health and safety information is limited to what is reasonably needed and is not used for advertising.
- **Service providers:** Website, booking, payment, messaging, analytics and technology providers may process information for Elevate.
- **Your rights:** You may ask to access or correct your Personal Information and may raise a privacy concern with our Privacy Officer.
- **Privacy contact:** Privacy Officer, info@experienceelevate.ca, 705-498-0202, 395 Main Street East, North Bay, Ontario P1B 9M2.

1. Who We Are and What This Policy Covers

This Privacy Policy describes how Elevate Wellness & Performance Co. Inc., operating as Elevate Wellness & Performance ('Elevate,' 'we,' 'us' or 'our'), collects, uses, discloses, retains and protects Personal Information. Our principal place of business is 395 Main Street East, North Bay, Ontario P1B 9M2.

This Policy applies when you use or interact with Elevate's website, booking portal, mobile or online experience, accounts, memberships, class packs, drop-ins, events, workshops, retail and hydration offerings, facility access, participant waivers and safety screens, customer service, promotions, surveys, social-media pages and other services that link to this Policy (collectively, the 'Services').

This Policy does not govern an independent practitioner's clinical records or a third-party website, app or service that determines its own purposes for processing information. Those parties' privacy notices may also apply. Section 9 explains this distinction.

If a collection form or service-specific notice conflicts with this Policy, the more specific notice governs for that collection, subject to applicable law.

2. Meaning of Personal Information

'Personal Information' means information about an identifiable individual, alone or combined with other information. It may include a name, contact details, date of birth, account identifier, booking history, transaction information, online identifier, image, voice, correspondence, and health or safety information. It

generally does not include business contact information used only to communicate with someone about their work, where applicable law excludes that information.

Information that has been aggregated or de-identified so that it cannot reasonably be associated with an identifiable individual is not treated as Personal Information. We may use this information for lawful business analysis, planning and service improvement and will not attempt to re-identify it except where permitted or required by law.

3. Personal Information We Collect

3.1 Identity, Contact and Account Information

We may collect your name, preferred name, postal address, email address, telephone number, date of birth or age range, emergency contact, username, password credential or sign-in token, communication preferences, and information needed to verify identity, age, guardian authority or account ownership.

3.2 Booking, Membership and Facility Information

We may collect membership or package selected, purchases, bookings, waitlists, attendance, guest use, check-in and facility-access records, cancellations, credits, customer-service history, signed agreements, acknowledgments, consent records, conduct or safety restrictions, incident reports, and information needed to administer programs, workshops and events.

3.3 Payment and Transaction Information

Payment-card and banking information is generally collected and processed by a payment processor. Elevate may receive a transaction identifier, payment status, billing address, card type, expiry date or limited card details such as the last four digits, together with invoices, refunds, credits and chargeback information. Elevate does not intend to store complete payment-card numbers in its own ordinary business records.

3.4 Health, Safety and Accessibility Information

To support safe participation, we may collect limited information about medical clearance, contraindications, injuries, pregnancy or postpartum status, allergies, medications or conditions relevant to a selected activity, accessibility needs, emergency events and responses, and answers to health or modality safety screens. We ask that you provide only information reasonably relevant to safe participation and use a private or secure communication method for sensitive details whenever available.

3.5 Communications, Media and Feedback

We may collect messages, call notes, form submissions, support requests, complaints, reviews, survey responses, contest or promotion entries, marketing preferences and records of email or text delivery and interaction. We collect photographs, video, audio, testimonials or social-media content for promotional use only with appropriate notice and consent or another lawful basis.

3.6 Website, Device and Usage Information

When you use a website, app, booking tool or electronic message, we or our providers may automatically collect IP address, browser and device type, operating system, language, approximate location derived from

IP address, referring page, pages or features used, dates and times, booking interactions, cookie or device identifiers, diagnostic information, and whether an electronic message was opened or a link was selected.

3.7 Business, Employment and Other Information

If you apply for work, seek to provide services, represent a vendor or organization, or enter a partnership, we may collect professional contact information, qualifications, employment history, references, background information where lawful and appropriate, and information needed to evaluate or administer the relationship. Internal employee records may be governed by separate workplace practices.

4. How We Collect Personal Information

We may collect Personal Information:

- **Directly from you** when you create an account, book, purchase, sign a waiver, complete a safety screen, visit the facility, communicate with us, enter a promotion or provide consent.
- **From a parent, guardian, guest organizer or authorized representative** where that person is permitted to provide information or act for you.
- **From service providers and platforms** such as website, booking, payment, messaging, analytics, social-media and account-login providers, in accordance with your settings and their notices.
- **From independent practitioners or emergency personnel** with consent, for administrative or safety purposes, or as otherwise permitted or required by law.
- **Automatically** through cookies, logs, pixels, software development kits and similar technologies when you use digital Services.
- **From public or lawful sources** such as public business pages, referrals or information provided in connection with a business relationship.

5. Why We Use Personal Information

- Create and manage accounts, bookings, memberships, packages, waitlists, attendance, guest access and facility entry.
- Deliver Services, provide instructions, respond to questions, personalize reasonable service preferences and administer customer support.
- Assess eligibility and support participant, visitor and staff safety, including emergency response, accessibility and incident management.
- Process payments, issue receipts, administer recurring billing, refunds, credits, promotions and financial records, and detect or address fraud and chargebacks.
- Send transactional communications, including confirmations, reminders, schedule changes, safety notices, account information, renewal notices and policy updates.
- Send marketing or promotional communications where we have the consent required by law and manage opt-outs and suppression lists.
- Operate, secure, troubleshoot, analyze and improve the Services, facility, programs, customer experience, technology and business planning.

- Enforce agreements and facility rules; investigate complaints; protect legal rights, people and property; and establish, exercise or defend legal claims.
- Meet legal, regulatory, accounting, tax, insurance, public-health and record-keeping obligations, and respond to lawful requests.
- Complete a proposed or completed financing, reorganization, merger, sale or transfer of all or part of the business, subject to appropriate confidentiality and legal requirements.
- Use information for another purpose identified at or before collection, or later with any additional consent required by law.

6. Consent and Your Choices

Elevate seeks meaningful consent appropriate to the sensitivity of the information and the reasonable expectations of the individual. Consent may be express, implied or provided by an authorized representative, depending on the circumstances and applicable law. We will make a reasonable effort to explain the information involved, why it is needed, material disclosures, and reasonably foreseeable significant consequences.

You may decline an optional collection or withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Withdrawal does not affect processing that was lawful before withdrawal. If information is necessary to provide a requested Service, verify eligibility, process payment or protect safety, declining or withdrawing consent may mean that we cannot provide all or part of that Service. We will explain the consequence where practical.

Elevate will obtain new consent where required before using Personal Information for a materially different purpose or disclosing it to a new category of third party that an individual would not reasonably expect. Consent is not a substitute for limiting collection and use to purposes a reasonable person would consider appropriate.

7. Health and Other Sensitive Information

Elevate limits access to health, safety, financial, identity-verification and minor-related information to people who reasonably need it for their work. Health and safety information is used for screening, eligibility, accommodation, instruction, emergency response, incident management, insurance and legal obligations. It is not used to build advertising audiences or promote unrelated products.

A safety screen is not a medical diagnosis or a complete clinical record. Where more detailed medical information is necessary, Elevate may ask you to speak privately, obtain clearance from a qualified professional, or deal directly with an independent practitioner rather than place unnecessary details in a booking profile or ordinary email.

8. When We Disclose Personal Information

Elevate may disclose Personal Information only for identified purposes and as permitted or required by law, including:

- **Service providers:** To vendors that host or support our website, booking, account, payment, communications, analytics, accounting, document, cloud, IT, security or customer-service functions.
- **Personnel and contractors:** To Elevate employees, instructors, guides and contractors who need the information to provide Services, administer the business or support safety.
- **Independent practitioners:** With your consent or as permitted by law for scheduling, referral, coordinated administration, accommodation, safety or emergency purposes. A practitioner's clinical records remain subject to the practitioner's responsibilities.
- **Professional advisers and insurers:** To accountants, auditors, lawyers, consultants, lenders, insurers, claims administrators and other advisers who require the information for legitimate professional purposes.
- **Legal and safety recipients:** To emergency contacts, first responders, public authorities, regulators, courts or other persons where reasonably necessary for an emergency, life or safety, a lawful demand, an investigation, legal compliance or protection of rights.
- **Business transaction parties:** To prospective or completed purchasers, investors, financiers, successors or advisers in a business transaction, subject to confidentiality, limited-use and legal protections appropriate to the stage of the transaction.
- **Other recipients:** To another person at your direction, with your consent, or for another purpose permitted or required by law.

We do not sell or rent Personal Information. If Elevate ever proposes a practice that applicable law treats as a sale, or a new advertising use that requires consent, we will provide clear notice and any required choice before beginning that practice.

9. Service Providers, Platforms and Independent Practitioners

9.1 Website, Booking and Payment Providers

Elevate may use providers such as Webador for website functions and WellnessLiving for booking, membership and account administration, together with payment processors, email or SMS providers, cloud services, analytics services, accounting systems and security tools. Providers may collect information directly through an embedded widget or linked page. They are expected to use Personal Information only for authorized services, protect it appropriately and comply with applicable law; where a provider independently determines its own purposes, its privacy policy also applies.

Provider names and functions may change as our Services evolve. We will update this Policy or provide another notice if a change materially affects how Personal Information is handled or requires new consent.

9.2 Independent Regulated Practitioners

Massage therapists, occupational therapists, athletic therapists, kinesiologists and other practitioners operating at or through Elevate may be independent from Elevate. A regulated health professional may be a separate health information custodian under Ontario's Personal Health Information Protection Act, 2004 and may provide a separate privacy notice and consent process. Elevate is not automatically entitled to that practitioner's clinical notes or treatment record. Elevate and the practitioner may share limited scheduling, payment, referral, accommodation or safety information only with appropriate authority, consent or another lawful basis.

10. Processing Outside Canada

Some service providers or their systems may be located outside Ontario or Canada, including in the United States. Personal Information processed in another jurisdiction may be subject to that jurisdiction's laws and may be accessible to courts, law-enforcement or national-security authorities there. Elevate remains accountable for Personal Information transferred to a provider for processing and uses contractual or other measures appropriate to the sensitivity of the information. Contact the Privacy Officer if you would like information about relevant service-provider practices.

11. Cookies, Analytics and Advertising

Our digital Services may use cookies, pixels, local storage, logs and similar technologies. These technologies may be operated by Elevate or a provider and may fall into the following categories:

- **Essential:** Needed for security, sign-in, navigation, forms, booking, payment and core website functions.
- **Functional:** Remember settings and improve usability.
- **Analytics:** Help measure visits, traffic sources, feature use and technical performance.
- **Advertising and measurement:** Help measure campaigns or show relevant advertising, but only where used with the notice and consent required by law.

Where required, we will ask for consent before using non-essential technologies. You may use an available cookie preference tool and may also adjust browser or device settings. Blocking essential technologies may prevent parts of the Services from working. If Elevate uses advertising audience matching, pixels or hashed contact identifiers, we will not include health or waiver information and will provide any notice and choice required by law.

12. Email, Text Messages and Marketing

Elevate may send service messages that are necessary to administer your relationship with us, such as receipts, booking confirmations, reminders, schedule changes, safety notices, account alerts, renewal information and responses to your requests. These are different from promotional messages.

We send commercial electronic messages in accordance with Canada's anti-spam law, including applicable consent, sender-identification and unsubscribe requirements. You may unsubscribe through the link or instructions in a message or by contacting us. We will process an unsubscribe request within the period required by law, although you may still receive essential transactional or safety communications. We keep a limited suppression record so we can honour your preference.

13. Retention and Secure Disposal

Elevate keeps Personal Information only as long as reasonably necessary for the identified purposes and legal or legitimate business requirements. Retention depends on the type and sensitivity of information, the duration of the customer or business relationship, tax and accounting rules, warranty or chargeback periods, limitation periods, insurance requirements, health and safety needs, complaint or incident history, and whether a legal hold or dispute applies.

When Personal Information is no longer required, we securely delete, destroy or de-identify it. Backup copies may remain for a limited period and are protected from ordinary use until overwritten or securely removed. A request to delete information may be limited where retention is required or permitted by law, necessary to complete a transaction, needed for safety, or reasonably required to establish, exercise or defend a legal claim.

14. Safeguards and Privacy Incidents

Elevate uses administrative, technical and physical safeguards appropriate to the sensitivity, quantity, format and location of Personal Information. Measures may include access controls, role-based permissions, password and multi-factor protections where available, staff confidentiality and training, secure configuration, encryption where appropriate, vendor diligence, backups, locked storage and secure disposal. No physical or electronic safeguard can eliminate every risk.

If Elevate becomes aware of a loss, unauthorized access, use or disclosure, we will take reasonable steps to contain and investigate it, address foreseeable harm, document the incident, and notify affected individuals, regulators or others where required by law. Please notify us promptly if you suspect that an Elevate account or communication has been compromised.

15. Children and Minor Participants

A person under 18 may participate only where Elevate permits the activity and a parent or legal guardian provides required consent and information. We do not knowingly invite a child under 13 to create an independent account or provide Personal Information online without parent or guardian involvement. We may verify guardian authority and collect the minimum information reasonably necessary to administer participation, safety and emergency contact.

Parents and guardians should not provide unnecessary medical detail in an ordinary online form or email. They may contact Elevate to request an appropriate private method. Subject to applicable law and the minor's capacity and interests, a parent, guardian or capable young person may request access, correction or withdrawal of consent. Elevate may retain information needed for legal, safety or insurance purposes.

16. Your Privacy Rights

Subject to applicable law, you may:

- Ask whether Elevate holds Personal Information about you and request access to that information and an account of its use or disclosure.
- Ask us to correct information that is inaccurate or incomplete and have unresolved accuracy concerns noted where appropriate.
- Withdraw consent for future collection, use or disclosure, subject to legal or contractual restrictions and reasonable notice.
- Change communication or cookie choices and unsubscribe from promotional messages.
- Ask about our privacy practices, service providers and processing outside Canada.

- Challenge compliance and make a privacy complaint without retaliation for raising a concern in good faith.

Send a written request to the Privacy Officer at info@experienceelevate.ca or 395 Main Street East, North Bay, Ontario P1B 9M2. Please describe the records or concern clearly. We may request information reasonably necessary to verify identity or authority before providing access or making a change. We will respond within the period required by law and explain any lawful refusal or fee before proceeding. Access may be limited where disclosure would reveal another person's information, confidential commercial information, privileged material, or information that law requires or permits us to withhold.

17. Questions and Complaints

The Privacy Officer is accountable for Elevate's privacy program and will receive questions, access or correction requests, consent withdrawals and complaints. Elevate will investigate a complaint fairly and communicate the outcome and any appropriate corrective step.

If you are not satisfied after giving Elevate an opportunity to respond, you may contact the Office of the Privacy Commissioner of Canada at priv.gc.ca. Where an independent regulated health professional controls the record, you may also have a right to contact the Information and Privacy Commissioner of Ontario at ipc.on.ca. These options do not limit another remedy available by law.

18. Changes to This Policy

Elevate may update this Policy as its Services, providers and legal obligations change. The revised Policy will show a new Last Updated date and will be posted or otherwise made available. We will bring a material change to your attention and obtain new consent before applying a materially different use or disclosure to previously collected Personal Information where required by law. Continued use alone will not replace consent where express consent is required.

19. Contact the Privacy Officer

Organization: Elevate Wellness & Performance Co. Inc.

Title: Privacy Officer

Address: 395 Main Street East, North Bay, Ontario P1B 9M2

Email: info@experienceelevate.ca

Telephone: 705-498-0202

Website: experienceelevate.ca

For your protection, please do not include detailed medical information, full payment-card numbers, passwords or government identification in an ordinary email. Ask us for an appropriate secure method if sensitive information is necessary.