

ReTrain Canada Incorporated Privacy Policy

Effective Date: May 11, 2026

Statement of Privacy

ReTrain Canada Incorporated (“Retrain”, “we”, “our”, or “us”) is committed to protecting the privacy, confidentiality, accuracy, and security of all personal information entrusted to us while our business operations.

Retrain complies with applicable Canadian privacy legislation, including:

- the Personal Information Protection and Electronic Documents Act (PIPEDA);
- Alberta’s Personal Information Protection Act (PIPA);
- and other applicable provincial and federal privacy laws.

This Privacy Policy applies to ReTrain Canada Incorporated, its employees, contractors, consultants, training facilitators, business operations, websites, and related services.

A copy of this Privacy Policy will be provided upon request.

Accountability

Retrain is responsible for personal information under its custody or control.

Retrain has designated a PIPA-Mandated Privacy Officer responsible for overseeing compliance with applicable privacy legislation, including PIPEDA and Alberta’s Personal Information Protection Act (PIPA).

Questions, requests, or complaints regarding this Privacy Policy or the handling of personal information may be directed to:

PIPA-Mandated Privacy Officer

ReTrain Canada Incorporated

400 - 11012 Macleod Trail SE

Calgary, Alberta T2J 6A5

<https://www.retraincanada.com>

What is Personal Information?

“Personal Information” means information about an identifiable individual.

Depending on the nature of the services provided, personal information may include:

- name;
- home or business address;
- phone number;
- email address;
- employment history;
- vocational rehabilitation information;
- educational background;
- training participation records;
- disability accommodation information;
- payment or billing information;
- government-issued identifiers where required by law;
- technical identifiers such as IP addresses and device information.

Retrain recognizes that some personal information may be sensitive in nature and will apply safeguards appropriate to the sensitivity of the information.

What Personal Information Do We Collect?

Retrain collects only the personal information reasonably necessary to provide services, administer programs, maintain business operations, and comply with legal obligations.

The type of information collected depends on the services being provided.

Training and Vocational Rehabilitation Services

Retrain may collect personal information for purposes including:

- program registration;
- vocational rehabilitation services;
- training delivery;
- learner support;
- attendance tracking;
- certification management;
- accommodation requests;
- client communications;
- and contractual reporting obligations.

Information collected may include:

- first and last name;
- contact information;
- employer or organization information;
- training participation records;
- assessment results;
- educational history;
- accommodation-related information;
- employment or vocational information.

Sensitive information is collected only where reasonably necessary and appropriate consent has been obtained.

Website Information

Retrain's website may collect limited technical information and website usage analytics, including:

- browser type;
- operating system;
- IP address;
- website interaction data;
- approximate geolocation;
- referral pages;
- cookie identifiers.

This information is used to:

- improve website functionality;
- understand website usage trends;
- maintain website security;
- and improve user experience.

Retrain may use Google Analytics or similar services to assist with website analytics.

Users may disable cookies through browser settings; however, portions of the website may not function properly as a result.

Business and Client Information

Retrain may collect business-related information for purposes including:

- contracting;
- invoicing;
- scheduling;
- customer support;
- procurement requirements;
- and project administration.

This information may include:

- organization name;
- business contact information;
- billing information;
- job title;
- contract information.

Consent

Retrain obtains consent for the collection, use, and disclosure of personal information except where otherwise authorized or required by law.

Consent may be obtained:

- verbally;
- electronically;
- in writing;
- or through voluntary provision of information for an obvious business purpose.

Individuals may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice.

Withdrawal of consent may affect Retrain's ability to provide certain services.

Retrain does not sell personal information and does not disclose personal information for unrelated marketing purposes without express consent.

Use and Disclosure of Personal Information

Retrain uses and discloses personal information only for purposes identified at or before the time of collection, unless otherwise authorized by law.

Personal information may be disclosed:

- to authorized employees or contractors with a legitimate business need;
- to service providers supporting business operations;
- where required by law;
- to protect legal rights or safety;
- or with the individual's consent.

Retrain requires service providers to maintain appropriate safeguards for personal information.

Information Safeguards

Retrain takes the protection of personal information seriously and employs reasonable administrative, technical, and physical safeguards appropriate to the sensitivity of the information.

Safeguards may include:

- role-based access controls;
- least-privilege access management;
- password enforcement;
- multi-factor authentication;
- endpoint protection technologies;
- encryption of portable devices;
- secure cloud environments;
- employee confidentiality obligations;
- restricted access to records;
- security monitoring and logging.

While Retrain uses reasonable safeguards, no method of electronic transmission or storage can be guaranteed completely secure.

Information Accuracy

Retrain makes reasonable efforts to ensure personal information is accurate, complete, and up to date as necessary for the purposes for which it is used.

Individuals are encouraged to notify Retrain of changes or corrections to their information.

Retention and Destruction of Information

Retrain retains personal information only as long as reasonably necessary to fulfill identified business, legal, contractual, or regulatory purposes.

When information is no longer required, Retrain securely destroys, deletes, anonymizes, or renders the information non-identifying using methods appropriate to the sensitivity of the information.

Destruction methods may include:

- secure deletion;
- encryption key destruction;
- physical destruction of media;
- shredding of paper records;
- anonymization techniques.

Certain records may be retained longer where required by law, contractual obligations, audit requirements, or ongoing investigations.

Breach Notification

Where required by applicable law, Retrain will notify affected individuals and the Office of the Information and Privacy Commissioner of Alberta of a breach involving personal information where there exists a real risk of significant harm.

Retrain maintains incident response and breach management procedures designed to support timely investigation and response to privacy or security incidents.

Access to Personal Information

Individuals may request access to personal information held by Retrain, subject to legal limitations and exceptions under applicable legislation.

Requests for access or correction must be submitted in writing to the Privacy Officer.

Retrain may require verification of identity prior to processing requests.

Retrain will respond to requests within timelines required by applicable privacy legislation.

Cross-Border Processing and Service Providers

Retrain may use third-party service providers or cloud-based technologies that process or store information outside Canada.

Current or potential service providers may include:

- Microsoft 365;
- HubSpot;
- Google Analytics;
- and other technology vendors supporting business operations.

Where information is processed outside Canada, it may be subject to lawful access requirements of foreign jurisdictions.

Retrain takes reasonable steps to ensure service providers maintain appropriate privacy and security protections.

Third-Party Websites

Retrain's website may contain links to third-party websites.

Retrain is not responsible for the privacy practices, content, or policies of external websites.

Changes to this Privacy Policy

Retrain reserves the right to modify this Privacy Policy at any time.

Updated versions will be posted on our website with a revised effective date.

Questions, Requests, and Complaints

Questions, concerns, requests for access, or complaints regarding privacy practices may be directed to:

PIPA-Mandated Privacy Officer

ReTrain Canada Incorporated

400 - 11012 Macleod Trail SE

Calgary, Alberta T2J 6A5

<https://www.retraincanada.com>

Email: Info@retraincanada.com

Individuals may also contact the Office of the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta

Suite 2460, 801 – 6 Avenue SW

Calgary, Alberta T2P 3W2

Phone: (403) 297-2728

Toll Free: 1-888-878-4044

Website: <https://oipc.ab.ca/>