

# **UNIVERSAL COLLEGE OF REFLEXOLOGY - PRIVACY POLICY**

This document was last updated in February, 2009.

We have created this Privacy Policy to demonstrate our firm commitment to privacy and security. This Privacy Policy describes how our company collects information from all end users of our Internet Services (the "Services") those who access some of our Services but do not have accounts ("Visitors") as well as those who may purchase Products and/or pay a monthly service fee to subscribe to the Service ("Members") what we do with the information we collect, and the choices Visitors and Members have concerning the collection and use of such information. We request that you read this Privacy Policy carefully.

## **1. ACKNOWLEDGMENT AND ACCEPTANCE OF TERMS**

The Universal College of Reflexology is committed to protecting your privacy. This Privacy Policy sets forth our current privacy practices with regard to the information we collect when you interact with our website.

By accessing [www.iReflexology.com](http://www.iReflexology.com), you acknowledge and fully understand The Universal College of Reflexology's Privacy Policy and freely consent to the information collection and use practices described in this Website Privacy Policy.

## **2. VOLUNTARY CUSTOMER SURVEYS**

We may periodically conduct both business and individual customer surveys. We encourage our customers to participate in these surveys because they provide us with important information that helps us to improve the types of Products and Services we offer and how we provide them to you. Your personal information and responses will remain strictly confidential, even if the survey is conducted by a third party. Participation in our customer surveys is voluntary.

We may take the information we receive from individuals responding to our Customer Surveys and combine (or aggregate) it with the responses of other customers we may have, to create broader, generic responses to the survey questions (such as gender, age, residence, hobbies, education, employment, industry sector, or other demographic information). We then use the aggregated information to improve the quality of our Services to you, and to develop new Services and products. This aggregated, non-personally identifying information may be shared with third parties.

### **3. PARTICIPATING MERCHANT POLICIES**

Related Services and offerings with links from this website, including vendor sites, have their own Privacy Policies that can be viewed by clicking on the corresponding links within each respective website. Online merchants and others who participate in the Universal College of Reflexology's Services are encouraged to participate in industry privacy initiatives and to take a responsible attitude towards consumer privacy. However, since we do not have direct control over the policies or practices of participating merchants and other third parties, we are not responsible for the privacy practices or contents of those sites. We recommend and encourage that you always review the privacy policies of merchants and other third parties before you provide any personal information or complete any transaction with such parties.

### **4. INFORMATION WE COLLECT AND HOW WE USE IT**

The Universal College of Reflexology collects information in different ways from Visitors and Members who access the various parts of our Services and the network of web sites accessible through our service. We use this information primarily to provide a customized experience as you use our Products and Services, and generally, do not share this information with third parties. However, we may disclose personal information collected if we have received your permission beforehand or in very special circumstances, such as when we believe that such disclosure is required by law or other special cases described below. There are three ways in which The Universal College of Reflexology collects certain information from and about its users: (a) directly from our Web Server logs (b) cookies and (c) the user.

#### **a. Web Server Logs**

When you visit our Website, we may track information to administer the site and analyze its usage. Examples of information we may track include:

- Your Internet protocol address.
- The kind of browser or computer you use.
- Number of links you click within the site.
- State or country from which you accessed the site.
- Date and time of your visit.
- Name of your internet service provider.
- Web page you linked to our site from.
- Pages you viewed on the site.

#### **b. Use of Cookies**

The Universal College of Reflexology may use cookies to collect, store, and sometimes track information for statistical purposes to improve the products and Services we provide and to manage our telecommunications networks.

A "cookie" is a small data file that can be placed on your hard drive when you visit certain web sites. Our company may use cookies to collect, store, and sometimes track information for statistical purposes to improve the products and Services we provide and to manage our telecommunications networks.

If you are a Visitor or Member we may use a cookie to save your settings and to provide customizable and personalized Services. These cookies do not enable third parties to access any of your customer information. Additionally, be aware that if you visit other web sites where you are prompted to log in or that are customizable, you may be required to accept cookies.

One of the primary purposes of cookies is to provide a convenience feature to save you time. For example, if you personalize a web page, or navigate within a site, a cookie helps the site to recall your specific information on subsequent visits. This simplifies the process of delivering relevant content and eases site navigation by providing and saving your preferences and login information as well as providing personalized functionality.

You can accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies. If you reject cookies by changing your browser settings then this may disable some of the functionality on our Website.

Advertisers and partners may also use their own cookies. We do not control use of these cookies and expressly disclaim responsibility for information collected through them.

### **c. Personal Information Users**

Visitors/Members to our website can register to purchase Services. When you register you may be asked to provide certain personal information when you sign up for our Products or Services. Such as name, address, email, telephone number or facsimile number, account number and other relevant information. The personal information collected from Visitors/Members during the registration process is used to manage each Visitors/Member's account (such as for billing purposes). This information is not shared with third parties, unless specifically stated otherwise or in special circumstances.

However, in instances where our company and a partner jointly promote our Services, we may provide the partner certain personal information, we will not disclose personally identifiable information we collect from you to third parties without your permission except to the extent necessary including:

- To fulfill your service requests for Services
- To protect ourselves from liability
- To respond to legal process or comply with law, or

- In connection with a merger, acquisition, or liquidation of the company

In this instance, personal information may not be used by the partner for any other purpose. We may also generate non-identifying and aggregate profiles from personal information Visitors/Members provide during registration (such as the total number, but not the names, of Visitors/Members). As explained in more detail below, we may use this aggregated and non-identifying information to sell advertisements that appear on the Services.

## **5. USE OF WEB BEACONS OR GIF FILES**

The Universal College of Reflexology's [www.iReflexology.com](http://www.iReflexology.com) web pages may contain electronic images known as web beacons – sometimes also called single-pixel gifs – that allow the Universal College of Reflexology to count users who have visited those pages and to deliver co-branded Services. The Universal College of Reflexology may include web beacons in promotional e-mail messages or newsletters in order to determine whether messages have been opened and acted upon.

Some of these Web beacons may be placed by third party service providers to help determine the effectiveness of our advertising campaigns or email communications. These Web beacons may be used by these service providers to place a persistent cookie on your computer. This allows the service provider to recognize your computer each time you visit certain pages or emails and compile anonymous information in relation to those page views, which in turn enables us and our service providers to learn which advertisements and emails bring you to our website and how you use the site. The Universal College of Reflexology prohibits Web beacons from being used to collect or access your personal information.

## **6. ACCESSING WEB ACCOUNT INFORMATION**

**YOU MUST BE EIGHTEEN (18) YEARS OR OLDER TO ACCESS THIS WEB SITE. IF YOU ARE UNDER EIGHTEEN YEARS OF AGE, YOU ARE NOT PERMITTED TO ACCESS THIS WEB SITE FOR ANY REASON. DUE TO THE AGE RESTRICTIONS FOR USE OF THIS WEB SITE, NO INFORMATION OBTAINED BY THIS WEB SITE, FALLS WITHIN THE CHILD ONLINE PRIVACY ACT (COPA) AND IS NOT MONITORED AS DOING SO.**

We will provide you with the means to ensure that personally identifiable information in your web account file is correct and current. You may review this information by contacting us by sending an email to our support staff at: [info \(at\) universalreflex dot com](mailto:info@universalreflex.com).

## **7. PUBLIC FORUMS**

Please remember that any information you may disclose in any Member Directory, or other public areas of our Web sites or the Internet, becomes public information. You should exercise caution when deciding to disclose personal information in these public areas.

## **8. OUR COMPANY'S COMMITMENT TO DATA SECURITY**

Services and Web sites we sponsor have security measures in place to protect the loss, misuse, and alteration of the information under our control. While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information.

## **9. CHANGES TO THIS POLICY**

The Universal College of Reflexology has the discretion to occasionally update this Privacy Policy. When we do, we will also revise the "updated" date at the top of this Privacy page. We encourage you to periodically review this Privacy Policy to stay informed about how we are helping to protect the personal information we collect. Your continued use of the service constitutes your agreement to this Privacy Policy and any updates.

## **10. CONTACT US**

If you have any questions regarding our Privacy Policy, its implementation, or the practices described herein, you may contact us at [info \(at\) universalreflex dot com](mailto:info@universalreflex.com) or send your comments to:

**Universal College of Reflexology  
11215 Jasper Avenue, Suite 439,  
Edmonton, AB T5K 0L5, CANADA**