

4L Academy's Privacy Policy

1. Our Privacy Philosophy

Privacy - that thing the public generally ignores, even though it's really important in the world we live in. Is anyone actually going to read this? Who knows. But if you do read it, we hope at least you find this interesting.

At 4L Academy Ltd. operating as 4L Academy (“**4L Academy**”, “**we**” or “**us**”), we have adopted this privacy policy (the “**Policy**”) because it's required by law. It has nothing to do with affirming our commitment to maintaining the accuracy, confidentiality, and security of personal information. It's because we're a company run mainly by lawyers who prefer to be in compliance with laws.

(The next two paragraphs are pretty boring. But we need to set out what personal information means and also do a little CYA.)

This Policy explains how we collect, use, disclose and safeguard the personal information that you or a third party provide. Providing personal information or authorizing a third party to disclose personal information to us signifies your consent to 4L Academy's collection, use and disclosure of personal information in accordance with this Policy. If you provide personal information to us about a third party or authorize a third party to disclose personal information to us, you agree that you were authorized to do so.

For the purposes of this Policy, “personal information” means information that can identify an individual directly or through other reasonably available means. “Personal information” does not include information that is used for the purpose of communicating or facilitating communication with an individual in relation to their employment, business, or profession. Notwithstanding anything to the contrary in this Policy, the meaning of “personal information” shall be interpreted in a manner that conforms with the minimum requirements of applicable privacy legislation.

2. Identifying Purposes and Obtaining Your Consent

We identify the purposes for collecting personal information at or before the time personal information is collected. We will not collect, use or disclose your personal information without your informed consent, unless required or permitted to do so by law.

(Informed consent is a fun concept - I mean seriously, if you haven't even read this Policy, then how informed can you be - but allegedly the mere act of stating this counts for something.)

At 4L Academy, we collect and use personal information so we can:

(i) provide, maintain, and improve our products and services and otherwise run and manage our business in the ordinary course;

(Look, we're basically running a school - so just like your teacher in elementary school took attendance, so do we. You get access to pre-readings and handouts after class, so we're going to send you those. And obviously it's generally a good idea to know who the heck your students are, so that you can deliver content appropriate to your experience. So whatever a school would want to do with your information, we probably want to do the same. We also really like feedback, so we'll be listening closely to what you tell us about our courses.)

(ii) provide information to our employees, contractors, instructors, and affiliates to allow them to perform services on our behalf, including the provision of personal information to service providers engaged by 4L Academy;

(Our instructors have to teach you, so it's nice that they know who you are, where you work, and all that jazz. Again, we're trying to provide high-quality education here, so that seems like something that would be helpful.

Remember that part about running a school - we have TAs and mentors and other people who pop into class from time to time - so they may have access to your personal information if they're involved in your class behind the scenes, but they'll only be using it for that purpose.

And from here on out - all references to 'employees' or 'contractors' are deemed to include our instructors.)

(iii) send you newsletters or other communications to which you have subscribed or may be interested;

(We are not marketing experts, but allegedly it's best practice to use Mailchimp or an equivalent and then blast out updates about our courses or other offerings. So we try to do that. We'll try to give you content tailored to you, but sometimes due to our lack of competence of using modern tools (the result of working in law for too long), we forget to ask important demographic questions or totally mess up tagging things. So sometimes you might get an email about a course for summer students even though you're a 10th year lawyer. As they say - never attribute to malice that which is adequately explained by stupidity.)

(iv) comply generally with privacy laws and all other applicable regulatory requirements;

(see the first page - we prefer to be compliant.)

(v) understand the demographics, interests, usage patterns, and other characteristics of customers and to track and analyze trends and patterns, including through the aggregation of personal information;

(What a laundry list of ambiguity - so much for informed consent. But generally speaking, if we were smarter, we'd be doing a much better job of this. You can assume we're using our limited competence to try to understand patterns and try to figure out what people like. So if we send stuff out through Mailchimp, maybe we'll be smart enough to A/B test some subject lines or offerings and see what resonates with a certain crowd. But don't overestimate our abilities to follow through on any of this. We're just reserving our right to try :))

(vi) administer surveys, contests, draws, and raffles;

(We like gathering data - if you haven't figured that out already - so surveys are likely. In fact, we run them in pretty much every class. Technically, we might be able to reverse-engineer your responses, but we're only

interested in the aggregate data and generally can't tell who said what. We also like Google Forms, so we can probably figure out who you are from those (if you include your name/email and we can't figure out who you are, then that does not bode well for our future). We sometimes give stuff away and might incentivize people to give testimonials or otherwise help promote us.)

(vii) offer you tailored content, including advertisements and promotions; and

(Wow this is pretty duplicative with one of the points above, since we'll probably do this by email (even more so because if you're Canadian, we need CASL consent). But maybe down the road we'll start charging legal tech companies or others in the space for working with us, so we might offer you some tailored content or promotions as a result.)

(viii) assist you when you contact our customer support services, including to direct your questions to appropriate individuals, investigate and address any of your concerns, and to improve and monitor our customer support responses.

(Customer support services - good one. We're a small team right now - but anyone on our team might help out if you send us an email or a message in another way. And in that case, they may need to know what course you're taking or other stuff about you. So they might access that for the purpose of trying to help you. Seems reasonable.)

We may also use your personal information for purposes that are otherwise consistent with the terms of this Policy or that are permitted or required by law, and for purposes for which you have otherwise provided consent.

(This is the general catch all provision, in case the laundry list above wasn't enough.)

Should we require your information to fulfill a purpose that is not identified in this Policy, we will obtain your consent before proceeding.

We are not currently smart enough to use AI to do anything fancy with your data, so to the extent that we're required (or become required) to disclose that, there you go. In the future, if we learn some new tricks, then we might use AI to analyze your data - because that seems like an obvious thing to do.

(When's that new Canadian privacy law coming into force?)

3. Limiting the Collection, Use and Disclosure of Your Personal Information

a) The information we collect

The type of personal information that we may ask collect, including when you register for a course, includes:

(i) your name, mailing address, email address, year of call/years of experience as a lawyer, school (if you are a student), where you work, and your legal interests (e.g. corporate vs. litigation); and

(ii) other information that you share in your communications with us, our employees, or our contractors, including on or through our websites www.4Lacademy.ca or www.4Lacademy.com (collectively, the “Website”) or on social media.

(We promise to collect nothing from you by fax, telefax, telefacsimile, or other ridiculous words that some lawyers still use in contracts.)

The choice to provide us with your personal information, either directly or through a third party, is yours. However, your decision to withhold particular information may limit our ability to provide you with some of our products or services.

b) How your information is collected

Personal information may be collected in a number of ways, including: in person, over the phone, by mail, over the Internet (including from our Website, by email, or through any of software that we use to teach or to manage our classes - like Zoom, Mentimeter, and Thinkific), and from third parties whom you have authorized to disclose personal information to us.

We may collect usage information from users of our services, including through the use of cookies, web beacons and tracking pixels, SDKs, and other similar technologies. Cookies are very small text files that are stored on your browser or device. Usage information collected from our Website and our applications may include your device type, device identifier, IP address, MAC address, location, browser type, operating system, duration of use, user behaviour, length of time spent on the services, and frequency of use. We may use this information for purposes including remembering your preferences and settings, determining the popularity of certain content, authenticating users, determining the effectiveness of any advertising campaigns, and analyzing the behaviour and interests of people (including traffic and trends) accessing our Website. We may also allow others to provide analytics services (e.g. Google Analytics) and audience measurement services for us, to serve advertisements on our behalf on the Internet, and to monitor and report on the performance of those advertisements. These third parties may perform such services through the use of cookies, web beacons and tracking pixels, SDKs, and other similar technologies. By modifying your browser settings, you may be able to block cookies or otherwise make adjustments to the use of cookies, although this may affect the functioning of certain 4L Academy services. You may also visit <http://optout.networkadvertising.org/?c=1> to opt out of certain other cookies.

(We have no actual plans here at the moment - our lawyers (okay, really just ourselves) told us to include this here, mainly because it was already in the precedent that we used and we didn't want to take it out. Everyone adds in this type of language. You hit 'Accept' all the time on cookie pop-ups anyways without even understanding what a cookie is. Be grateful we at least included an explanation :))

If you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party directly. If the third party does not sufficiently respond to your inquiries, please let us know immediately.

(Or take your time - it's more of your problem than our problem. We're not really in a hurry.)

Your personal information will only be used or disclosed in accordance with the purposes for which it was collected, unless you have otherwise consented or except where required or permitted by law.

c) Disclosure to third parties

We've finally arrived at the section you should care about. Congratulations if you got this far.

WE MAY DISCLOSE YOUR PERSONAL INFORMATION TO THE WHOLE WORLD FOR WHATEVER REASONS WE WANT. AND WE WROTE IT IN ALL CAPS BECAUSE WE LIKE YELLING WHEN WE WRITE PRIVACY POLICIES. HOPEFULLY IT'S EASIER TO READ THIS WAY. WHY IS THIS OUTDATED CONCEPT STILL A THING? WE'RE JUST GOING TO KEEP WRITING A LITTLE BIT MORE IN ALL CAPS TO MAKE IT EVEN LESS LIKELY THAT YOUR POOR BRAIN WILL GET TO THE END OF THIS PARAGRAPH. THIS IS THE LAST SENTENCE WE PROMISE.*

We may share your personal information with our service providers in order for them to provide services to or on behalf of 4L Academy, including processing and storage. These may include, for example, cloud storage providers and data analytics providers. To that end, when you provide personal information to 4L Academy, the information may be stored on servers hosted or owned by a third party.

(We're a modern company, so we use G-Suite products (including Google Analytics and Google Drive), we run classes in Zoom, and we use third party software like Mentimeter and Thinkific to give you a good experience and make life easier on our end. So yes - they will all get some of your personal information, one way or the other.)

If you use a credit or debit card or other method of payment for your purchase, information with respect to your payment method is required to process your payment. We do not store your payment information. Your payment information will be provided directly to our third party payment provider.

(If you pay on Thinkific, we're probably using Stripe on the back-end, so we definitely won't get your credit card information, which is unfortunate for us. At least we allow you to pay by credit card without having to speak with a human or send credit card information by email - that's a rarity in the legal space for some reason. Shout out to LawPay - we'd love to see more firms jump on the bandwagon to make life way easier for their clients.)

If you enroll in one of our courses, you may receive emails or other communications addressed to people in your course. If you're going to have class with them for 6-8 weeks, you're going to get to know them anyways. Maybe you'll even marry one of them one day. You may have your email address disclosed in any pre/post-class emails to the other students in your course. We don't always 'bcc everyone, since sometimes there's some nice post-email banter amongst the group.

On Thinkific, depending on your privacy settings, other people enrolled in one of our classes may see whatever demographic information you entered (or that we entered on your behalf, if we signed you up after your firm paid). And if you post in the community chat, then people will be able to see that (duh).

In some of our classes or events, we work together with legal tech companies to give you a chance to use their software. In those cases, we may need to provide them with your name and email address to get an account set up for you.

If your employer or school is reimbursing you for attending one of our classes, then if they ask us about you, we have to use common sense on our end. If they ask how many classes you've attended, we'll tell them that (that seems fair - they're paying the bill). If they ask how good a job you're doing, we're not going to disclose anything that could paint you in a bad light, unless you consent. In general, we'll ask you for consent for disclosing anything to your employer other than your attendance in class. Our goal is to create a safe space - so we don't want to jeopardize that. That said, if you share positive feedback about our courses, then we may let your employer or school know (that one is purely self-interested on our end).

We may (i) share your personal information with our affiliates; (ii) combine information internally across our affiliates or our different products and services; and (iii) combine personal information with demographic information, publicly available records and other third party information sources. We may use this information to provide you with a customized experience, to promote and develop products and services available through 4L Academy or its affiliates, or as otherwise permitted by this Policy.

(As of the date of this Policy, we don't have an affiliate yet, but maybe our tax advisors will want us to create one for any courses we run outside of Canada. So in the event that business booms and we can afford tax advice (that stuff is valuable, but boy is it expensive), we might end up having an affiliate, and then we want to reserve this right.)

If you post a review, make a comment, or otherwise submit personal information on a public forum such as social media accounts, public forums, or on our Website, your communications may be viewable by the public.

(Please say nice things about us. The more people other than us say nice things, the more likely we are to be successful. And we've heard money buys happiness - that's why there are so many happy lawyers around :))

We may also disclose personal information in situations where we are legally required or permitted to do so. The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements. In some instances, such as a legal proceeding or court order, we may also be required to disclose your personal information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the disclosure request have legitimate grounds to do so.

(Please don't give us any reason to sue you, and please don't sue us. Plus, since you agreed to our Terms of Service, it's likely a waste of your time and money to sue us. Let's hope our plain language limitation of liability clause holds up.)

Your personal information may be disclosed in situations where we are legally permitted to do so, such as in the course of employing reasonable and legal methods to enforce your rights or to investigate suspicion of unlawful activities. We may release certain personal information when we believe that such release is reasonably necessary to protect the rights, property and safety of ourselves and others.

(If we end up in a situation where this clause ends up applying, then that sounds like bad news on your end. Please don't expose yourself on camera.)

We may use and disclose your personal information to third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of our business or assets (including accounts) for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples, permitting such parties to determine whether to proceed or continue with the transaction, fulfilling any reporting or audit requirements to such parties, and/or disclosing personal information as part of concluding a sale or transfer of assets. Our successors and assigns may collect, use and disclose your personal information for substantially the same purposes as those set out in this Policy.

(If we ever sell this business (which had revenue of a whopping \$0 up to the end of August 2021), then we might have to disclose some personal information as part of due diligence or when the deal closes.)

*To be clear, the all caps language was a joke. We won't blindly disclose your personal information.

(We know you know it was a joke. But lawyers being lawyers, we need to make ourselves expressly clear.)

e) Keeping your information accurate

We make reasonable efforts to keep your personal information as accurate, complete and up-to-date as necessary. If desired, you may verify the accuracy and completeness of your personal information in our records.

(Please don't ask - we're busy people. You know how many companies include this type of language in their privacy policies (since they have to) and then when you reach out, they don't honour it. Plenty. But if you ask nicely, we'll honour your wish.)

Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file, we will remedy any such errors on a timely basis. In the event that inaccurate information is mistakenly sent to a third party, we will communicate relevant changes to the third party where appropriate.

4. Protecting Your Personal Information

a) Access to your information within 4L Academy

Access to private, sensitive and confidential information, including your personal information, is restricted to authorized employees or contractors with legitimate business reasons. For example, if you're taking a course, your instructor and your TA will have access to your personal information.

Our employees and contractors understand the importance of keeping your information private. All employees and contractors are expected to maintain the confidentiality of personal information at all times and failure to do so will result in appropriate disciplinary measures including dismissal.

b) Disposal and Retention

Except as otherwise permitted or required by law, your personal information will be retained for so long as is reasonably necessary to fulfil the purposes for which it was collected.

(Ask your employer if they actually comply with this requirement.)

c) Safeguarding your information

To ensure that your personal information is protected, we use security safeguards that are on par with the industry standard. We keep electronic customer files in a secured environment with restricted access and use.

(We'd insert information about locked cupboards and stuff like that, but we're a modern, paperless company.)

5. Addressing Your Inquiries and Concerns

We are happy to provide you with a copy of this Policy and to discuss any of its content with you.

(It's here. Here you go!)

Upon request, we will also inform you of: the type of personal information we have collected, how your personal information has been used, and any third parties to whom your personal information has been disclosed.

Please direct all questions or enquiries about this Policy to:

Privacy Officer, 4L Academy
10 King St. E, Suite 600
Toronto, ON, M5C 1C3
Email: aaron@4Lacademy.ca

(Be right back: adding Privacy Officer to my resume. Maybe one day we'll create an info@4Lacademy.ca account.)

6. Updating this Privacy Policy

Any changes to our privacy standards and information handling practices will be reflected in this Policy in a timely manner. 4L Academy reserves the right to change, modify, add, or remove portions of this Policy at any time. Please check this page periodically for any modifications. To determine when this Policy was last updated, please refer to the modification date at the bottom of this Policy.

4L Academy strives to evolve to meet our customer's needs and expectations and that means our products and services may change and how we offer our products and services may change. With that in mind, we review our privacy practices from time to time, and that our information handling practices may change. If 4L Academy makes a material change to this Policy, we will post a notice on our Website and highlight the changes. We may also notify you by email. Material changes to this Policy will be binding thirty (30) days after such changes have been introduced and for which notification of such material changes has been made (or earlier if you expressly agree to them when signing up for a course). You may determine when this Policy was last updated by referring to the date found at the bottom of this Policy. If at any point you do not agree with the terms of this Policy, you must not use 4L Academy's services.

(If this Policy scares you, then we have bad news for you. You may want to get off the Internet now.)

7. Website and Apps Governed by this Privacy Policy

Our Website is governed by the provisions and practices stated in this Policy. Our Website may contain links to third party sites or applications that are not governed by this Policy. This Policy will no longer apply once you leave our Website, and that we are not responsible for the privacy practices of third party sites or applications. We therefore suggest that you closely examine the respective privacy policies of third party sites and applications to learn how they collect, use and disclose your personal information.

(If you got this far, maybe you actually will closely examine the privacy policies of those sites and applications. We wouldn't bet on it. Is Zoom actually encrypting your personal information? Is it being stored in China? Who knows.)

8. Governing Law

This Policy and all related matters shall be interpreted and construed in accordance with the laws of the Province of Ontario and the applicable federal laws of Canada.

(We really need to build that commercial law class. People never understand what this clause actually means.)

9. Personal Information Outside of Canada

Your personal information may be stored outside of Ontario and outside of Canada by us or our third parties. You acknowledge and agree that, as a result, your personal information may be processed, used, stored or accessed in other jurisdictions and may be subject to the laws of those jurisdictions. For example, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement in other countries.

(Do you think we really know where your personal information is ending up? No idea. We use third party products and services so that we can provide some really good classes for our students and make things smoother on the back-end. We have 0 custom-built software. On the bright side, at least we don't have to raise money to run this business!)

Last revised August 28, 2021