

PRIVACY POLICY

Level Up Systems Coaching — getlevelled.com

Effective Date: April 1, 2026 **Last Updated:** April 1, 2026

Level Up Systems Coaching ("we", "us", or "our"), operated by John Bahen (OCN/BIN 1001557479), is committed to protecting your personal information and your right to privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard information obtained through getlevelled.com (the "Site") and our related services.

This Policy is governed by the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable Ontario privacy legislation. By using the Site, you consent to the practices described in this Policy.

1. INFORMATION WE COLLECT

We may collect the following categories of personal information, now or in the future as our services evolve:

a) Information You Provide Directly

- Name, email address, and phone number (via contact or inquiry forms);
- Billing and payment information (processed securely through third-party payment processors such as Stripe — we do not store full card details);
- Information shared during coaching intake, onboarding, or session notes;
- Communications you send us via email or the Site.

b) Information Collected Automatically

- IP address, browser type, device type, and operating system;
- Pages visited, time spent on pages, and referring URLs;
- Cookie and tracking data (see Section 5 below).

c) Information from Third Parties

We may receive information about you from analytics providers, advertising platforms, or payment processors in connection with your use of the Site.

d) Future Data Collection

As our services grow, we may collect additional types of personal information. We will update this Privacy Policy accordingly and, where required by law, seek your consent.

2. HOW WE USE YOUR INFORMATION

We use the information we collect to:

- Provide, operate, and improve our coaching services and the Site;

- Process bookings, payments, and client onboarding;
- Communicate with you about your coaching engagement, appointments, and inquiries;
- Send marketing communications, newsletters, or promotional content where you have opted in (you may unsubscribe at any time);
- Conduct internal analytics to understand how users interact with the Site;
- Comply with legal obligations and enforce our Terms of Service;
- Protect the safety and security of our users and the Site.

3. LEGAL BASIS FOR PROCESSING

Under PIPEDA and applicable law, we collect and process personal information on the following bases:

- **Consent:** Where you have provided explicit consent (e.g., signing up for a newsletter, agreeing to coaching services);
- **Contractual necessity:** Where processing is necessary to deliver services you have requested;
- **Legitimate interests:** Where we have a legitimate business interest (e.g., site analytics, fraud prevention) that does not override your privacy rights;
- **Legal obligation:** Where we are required to process information to comply with applicable law.

4. SHARING YOUR INFORMATION

We do not sell your personal information. We may share your information with:

- **Service providers:** Third-party vendors who assist with payment processing (Stripe), email delivery, scheduling, and website hosting, bound by confidentiality agreements;
- **Analytics providers:** Google Analytics and Meta/Facebook Pixel, to understand Site traffic and advertising performance (see Section 5);
- **Legal authorities:** Where required by law, regulation, or valid legal process;
- **Professional advisers:** Such as lawyers or accountants, under duties of confidentiality;
- **Business transfers:** In connection with a merger, acquisition, or sale of assets, with notice provided to you.

5. COOKIES & TRACKING TECHNOLOGIES

We use cookies and similar tracking technologies on our Site, which may include:

- **Google Analytics:** Collects anonymized data about how visitors use the Site (pages viewed, session duration, traffic source). You can opt out via Google's opt-out browser add-on;
- **Meta/Facebook Pixel:** Tracks visitor behaviour to measure the effectiveness of our advertising and to enable retargeting on Facebook and Instagram. You can manage your ad preferences at facebook.com/ads/preferences;

- **Essential cookies:** Necessary for the Site to function (e.g., session management, payment processing).

You may disable cookies through your browser settings; however, doing so may affect the functionality of certain parts of the Site.

6. DATA RETENTION

We retain personal information only for as long as necessary to fulfill the purposes outlined in this Policy, comply with legal obligations, resolve disputes, and enforce our agreements. Client coaching records are generally retained for a minimum of seven (7) years following the end of a coaching relationship, or as required by applicable law.

7. YOUR PRIVACY RIGHTS

Subject to applicable law, you have the right to:

- Access the personal information we hold about you;
- Request correction of inaccurate or incomplete information;
- Withdraw consent to processing at any time (where consent is the legal basis), without affecting the lawfulness of prior processing;
- Request deletion of your personal information, subject to our legal retention obligations;
- Lodge a complaint with the Office of the Privacy Commissioner of Canada (priv.gc.ca) if you believe we have handled your information improperly.

To exercise any of these rights, please contact us at the details in Section 11.

8. DATA SECURITY

We implement reasonable administrative, technical, and physical safeguards to protect your personal information against unauthorized access, disclosure, alteration, or destruction. However, no method of transmission over the internet or electronic storage is completely secure, and we cannot guarantee absolute security.

9. INTERNATIONAL DATA TRANSFERS

Some of our third-party service providers (including Google and Meta) may process or store data outside of Canada, including in the United States. By using the Site, you acknowledge that your information may be transferred to and processed in jurisdictions with different privacy laws than those in your home country. We take reasonable steps to ensure adequate protections are in place.

10. CHILDREN'S PRIVACY

Our Site and services are not directed to individuals under the age of 18. We do not knowingly collect personal information from minors. If you believe we have inadvertently collected such information, please

contact us and we will promptly delete it.

11. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. We will post the updated Policy on the Site with a revised effective date. Where changes are material, we will provide additional notice (such as by email) where required by law.

12. CONTACT US

If you have any questions, concerns, or requests regarding this Privacy Policy or our handling of your personal information, please contact our Privacy Officer:

John Bahen

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getlevelled.com

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Province of Ontario, Canada