



HHH INSTITUTE

HOLISTIC HARMONY HAVEN

Holistic & Complementary Health Education · Calgary, AB, Canada

DATA PROTECTION POLICY

Privacy Policy

PIPEDA & Alberta PIPA Compliant

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1. Introduction

HHH Institute, the educational arm of Holistic Harmony Haven, respects your privacy and is committed to protecting the personal information you entrust to us. This Privacy Policy explains what information we collect, how we use and disclose it, how long we keep it, and the rights you have. It is designed to comply with the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and Alberta's Personal Information Protection Act (PIPA).

2. Privacy Officer

HHH Institute has designated a Privacy Officer who is accountable for our compliance with this policy and applicable privacy law:

Privacy Officer	Pardeep Kaur Randhawa, Director
Email	privacy@holisticharmonyhaven.com
Location	Calgary, Alberta, Canada

3. Information We Collect

We collect only the personal information necessary for our educational purposes. Depending on your interactions with us, this may include:

- **Identification information** — name, email address, mailing address, telephone number, and date of birth (to confirm you are 18+).
- **Payment information** — billing details processed securely through Stripe; HHH Institute does not store full card numbers.
- **Academic records** — enrollment details, track, assessment results, attendance, and certificates earned.
- **Health intake information** — for Practitioner Track clinical practicums, mock or peer-client intake forms that may contain health information, handled under Consent Form D and Section 8.
- **Technical and analytics data** — cookies, device and browser information, and usage analytics from our website and the Thinkific platform.

4. How We Use Information (PIPEDA Principles)

HHH Institute applies the ten fair-information principles of PIPEDA to all personal information we handle:

Principle	How HHH Institute Applies It
Accountability	We are responsible for personal information under our control and have designated a Privacy Officer.
Identifying Purposes	We identify the purposes for collection at or before the time of collection.
Consent	We obtain meaningful consent for collection, use, and disclosure, except where law permits otherwise.
Limiting Collection	We collect only what is necessary for the identified purposes.
Limiting Use, Disclosure & Retention	We use and disclose information only for the purposes collected, and retain it only as long as necessary.
Accuracy	We keep personal information accurate, complete, and up to date.
Safeguards	We protect information with appropriate security safeguards (Section 9).
Openness	We make our privacy practices readily available, including through this policy.
Individual Access	We give individuals access to their information and the ability to correct it.
Challenging Compliance	We provide a way to challenge our compliance, via our Privacy Officer.

5. Legal Basis for Collection

Our legal basis for collecting and processing personal information is your consent and the necessity of performing our educational services and contractual obligations to you. In limited circumstances we may collect, use, or disclose information without consent where permitted or required by law (for example, to comply with a legal obligation or to protect safety).

6. Disclosure to Third Parties

We do not sell personal information. We share it only with service providers who help us deliver our programs, under contractual obligations to protect it and use it only for the purposes we specify:

Third Party	Purpose
Thinkific	Learning management platform hosting courses, accounts, and academic records
Stripe	Secure payment processing and refund handling
Email service providers	Transactional and instructional communications with students
Lab / assessment partners	Where a program includes optional lab-based components (Practitioner Track)

7. International Data Transfers

Some of our service providers, including Thinkific and Stripe, store and process data on servers located in the United States. This means your personal information may be transferred to, and stored in, jurisdictions outside Canada, where it may be subject to the laws of those jurisdictions, including lawful access by foreign authorities. HHH Institute requires its providers to maintain a comparable level of protection through contractual safeguards. By enrolling, you acknowledge this cross-border transfer.

7.1 Cross-Border Operations (In Development)

As an online-first institution, HHH Institute may in future extend its operations and partnerships to other jurisdictions, including India. Where we operate in or collect personal information from individuals in such jurisdictions, we will comply with applicable local data-protection laws — for example, India's Digital Personal Data Protection Act, 2023 (DPDP Act) — in addition to our obligations under PIPEDA and Alberta PIPA. These international initiatives are in development; this section is provided so that our commitments remain clear as our reach grows.

8. Data Retention

We retain personal information only as long as necessary for the purposes identified or as required by law:

Record Type	Retention Period
Academic records (enrollment, grades, certificates)	7 years
Clinical practicum / health-related records	10 years (consistent with Alberta health-records norms)
Complaint & grievance records	7 years from resolution

After the applicable retention period, information is securely destroyed or de-identified.

9. Security Measures

HHH Institute protects personal information using administrative, technical, and physical safeguards appropriate to its sensitivity. These include access controls and role-based permissions, encryption in transit, reputable processors (Thinkific, Stripe) with their own security programs, staff confidentiality obligations, and secure disposal of records. While no system can be guaranteed perfectly secure, we work diligently to protect your information and to respond promptly to any incident.

10. Your Rights Under PIPEDA & Alberta PIPA

Subject to legal limits, you have the right to:

- **Access** the personal information we hold about you (use Appendix A);
- **Correct** inaccurate or incomplete information;
- **Withdraw consent** to certain uses or disclosures, subject to legal or contractual restrictions (use Appendix B);
- **Complain** to our Privacy Officer and, if unsatisfied, to the Office of the Privacy Commissioner of Canada (OPC) or the Office of the Information and Privacy Commissioner of Alberta (OIPC).

We respond to access and correction requests within the timeframes required by law (generally within 45 days under Alberta PIPA / 30 days under PIPEDA, with permitted extensions).

11. Children's Privacy

HHH Institute programs are intended for adults aged 18 and over. We do not knowingly collect personal information from individuals under 18. If we learn that we have inadvertently collected such information, we will delete it promptly.

12. Cookies & Tracking

Our website and the Thinkific platform use cookies and similar technologies to operate the service, remember preferences, and understand usage through analytics. You can control cookies through your browser settings; disabling some cookies may affect functionality. We do not use cookies to sell your information.

13. Updates to this Policy

We review this Privacy Policy annually each June and may update it to reflect changes in our practices or the law. The current version and effective date are shown on the cover. Material changes will be communicated to enrolled students. This is version 1.0, effective 2026-06-18.

14. Contact for Privacy Concerns

To exercise your rights or raise a privacy concern, contact our Privacy Officer at privacy@holisticharmonyhaven.com. You may also contact the OPC (priv.gc.ca) or the OIPC Alberta (oipc.ab.ca).

Appendix A — Data Access Request Form

Submit to privacy@holisticharmonyhaven.com. We will respond within the timeframes required by PIPEDA and Alberta PIPA.

Full name

Email address

Description of the information you wish to access:

Signature

Date

We may need to verify your identity before releasing information.

Appendix B — Consent Withdrawal Form

Use this form to withdraw consent to specific uses or disclosures of your personal information. Some withdrawals may affect our ability to provide services, and certain records must be retained for legal periods (Section 8).

Full name

Email address

Consent(s) you wish to withdraw (be specific):

**I understand that withdrawing this consent
may affect the services HHH Institute can
provide to me. (Initial)**

Signature

Date
