



PRIVACY AND COOKIE POLICY

This Privacy and Cookie Policy ("Policy") explains how Thornevick Inc. ("Thornevick", "we" or "us") collects, uses and discloses your personal information through "thornevick.com" ("Website"), in accordance with the Personal Information Protection and Electronic Documents Act ("PIPEDA"), Alberta's Personal Information Protection Act ("PIPA") and, where they apply to you, other privacy laws such as the EU and UK General Data Protection Regulation ("GDPR") (collectively, "Data Protection Laws"). Our apps and other products have their own privacy policies, which apply when you use them.

1. Data Controller and Privacy Officer

The organization responsible for your personal information, and its data controller for the purposes of the GDPR, is Thornevick Inc., a corporation incorporated in Alberta and based in Calgary, Alberta (Canada), Alberta corporate access number 2028500094. For any requests regarding your personal information, please email us at hello@thornevick.com.

Our Privacy Officer is accountable for our compliance with Data Protection Laws and can be contacted about this Policy or any privacy matter by emailing hello@thornevick.com with "Privacy" in the subject line.

2. Categories of personal information that we collect, purposes and legal bases for our processing

We collect and use the following categories of personal information, for the purposes and on the legal bases set out below. We only collect what we need for these purposes, and we do not sell your personal information. Depending on where you live, some of the information below may not be considered personal information.

Purpose	Legal basis	Categories of personal information
a. To make the Website available to you and keep it secure and working properly.	Your implied consent when you visit the Website. Where the GDPR applies, our legitimate interest in running a secure and functional website (art. 6(1)(f) of the GDPR).	Technical information sent by your device and browser, such as your IP address, browser and device type, the pages you request and the date and time of your visit, as recorded in standard server logs.
b. To comply with our legal obligations and with lawful requests from competent authorities.	Compliance with a legal obligation to which we are subject, as required or permitted by Data Protection Laws (art. 6(1)(c) of the GDPR, where applicable).	Any information necessary for these purposes.
c. To establish, exercise or defend our legal rights, and to carry out business transactions (for example, a merger, acquisition, financing, reorganization or sale of all or part of our business or assets, and related due diligence).	As permitted by Data Protection Laws for legal claims and business transactions. Where the GDPR applies, our legitimate interest in protecting our rights and carrying out such transactions (art. 6(1)(f) of the GDPR).	Any information necessary for these purposes.



Purpose	Legal basis	Categories of personal information
d. To read and respond to messages you send us, including questions, support requests and business inquiries.	Your consent, which you give by contacting us. Where the GDPR applies, taking steps at your request (art. 6(1)(b) of the GDPR) or our legitimate interest in replying to you (art. 6(1)(f) of the GDPR).	Your name, email address and any other information you choose to include in your message.
e. To understand, in aggregate, how the Website is used (for example, the number of visits and which pages are viewed) so that we can improve it.	Your implied consent, to the extent this involves personal information. Where the GDPR applies, our legitimate interest in improving the Website (art. 6(1)(f) of the GDPR).	Aggregated usage statistics, such as page views, referring websites, device and browser type and country, which do not identify you. We do not use analytics cookies for this purpose.

To learn how we use cookies and similar technologies, see [Section 8 \(Cookies\)](#) below.

3. Data Retention

We store personal information on our own systems and on the servers of our service providers. We use reasonable technical and organizational safeguards designed to protect it against loss, theft and unauthorized access, use, disclosure or alteration. However, no transmission over the internet is completely secure, so please do not send us sensitive personal information by email.

Personal information processed for the purposes referred to in Section 2.a) is kept only as long as needed to operate and secure the Website and, in any case, for no more than 12 months.

Personal information processed for the purposes referred to in Section 2.d) is kept for as long as needed to respond to you and follow up and, in any case, for no more than 3 years from your last message to us.

Personal information processed for the purposes referred to in Section 2.b) is kept for as long as the law requires. For example, business and tax records are generally kept for 6 years.

Personal information processed for the purposes referred to in Section 2.c) is kept for up to 10 years from your last interaction with us, in line with applicable limitation periods.

Information processed for the purposes referred to in Section 2.e) is kept only in aggregated form that does not identify you.

When we no longer need personal information, we securely delete or anonymize it. To learn how long cookies and similar technologies store information, see [Section 8 \(Cookies\)](#) below.

4. Your Choices

You do not need to give us any personal information to browse the Website, apart from the technical information your browser sends automatically so the Website can load. Contacting us is optional, and you decide what to include in your message. You can also choose how cookies are handled on your device, as described in [Section 8 \(Cookies\)](#) below.



5. Sharing Your Personal Information

We do not sell or rent your personal information. We may share or disclose it to the following categories of recipients:

- service providers that support our business and the Website, such as hosting, email, IT and analytics providers, who may only use your personal information to provide services to us and must protect it;
- public, judicial or law enforcement authorities, where required or permitted by law;
- if we are involved in a merger, acquisition, financing, reorganization or sale of all or part of our business or assets (including related due diligence), the other parties to the transaction and our professional advisers. In that case, your personal information may be among the assets transferred to the new owner, who must continue to protect it in accordance with Data Protection Laws.

We will not disclose your personal information for any other reason unless the law requires or permits it, or you consent.

6. Transfers of Your Personal Information outside Canada

Some of our service providers, such as our hosting and email providers, may store or process personal information outside Canada, including in the United States. While it is outside Canada, your personal information is subject to the laws of the country where it is held and may be accessed by that country's courts, law enforcement and national security authorities. We choose service providers that protect personal information, and we require them to use it only to provide services to us.

Where the GDPR applies to a transfer of your personal information outside the European Economic Area or the United Kingdom, the transfer relies on safeguards recognized by Data Protection Laws, such as the European Commission's adequacy decision for Canada or standard contractual clauses.

To learn more about our policies and practices for service providers outside Canada, or if you have questions about these transfers, please email hello@thornevick.com.

7. Your Rights

Subject to the limits and exceptions set out in Data Protection Laws, you can exercise the following rights at any time, free of charge:

- Right of access. You can ask whether we hold personal information about you, and ask to see it along with information about how it has been used and to whom it has been disclosed.
- Right to correction. You can ask us to correct personal information that is inaccurate or incomplete.
- Right to withdraw your consent. Where we rely on your consent, you can withdraw it, subject to legal or contractual restrictions and reasonable notice. Withdrawing consent does not affect anything we did before you withdrew it.
- Right to erasure. You can ask us to delete your personal information.
- Right to restriction of processing. You can ask us to limit how we use your personal information.
- Right to data portability. You can ask for a copy of your personal information in a portable electronic format.
- Right to object. Where we rely on our legitimate interests, you can object to our use of your personal information on grounds relating to your particular situation, and you can always object to its use for direct marketing.



Some of these rights, such as erasure, restriction and portability, are available only under certain Data Protection Laws, including the GDPR.

If you are not satisfied with how we have handled your request, you can file a complaint with the Office of the Information and Privacy Commissioner of Alberta or the Office of the Privacy Commissioner of Canada. If the GDPR applies to you, you can also complain to the data protection authority of the country where you live or work, or where the alleged infringement took place.

To exercise your rights, or if you have any other questions about privacy at Thornevick, please email hello@thornevick.com. We may take reasonable steps to verify your identity before responding, and we will respond within the time limits set by Data Protection Laws.

8. Cookies

What are cookies and similar technologies?

When we say “cookies” in this Policy, we mean small files and similar technologies (such as local storage, pixels and software development kits) that store information on, or read information from, your device when you visit a website.

Cookies are usually grouped:

- (A) by purpose (technical, analytics and profiling cookies);
- (B) by who sets them (first-party and third-party cookies); and
- (C) by how long they last (session and persistent cookies).

These groupings matter because different rules can apply to different types of cookies.

Below, we explain each type of cookie and tell you which ones the Website uses.

A. By purpose

Technical cookies

Technical cookies are needed for a website to work properly or to provide a service you have asked for. For example, they can keep a page secure, spread traffic across servers or remember choices you have made, such as your cookie preferences.

Technical cookies do not require your consent.

Analytics cookies

Analytics cookies help a website owner understand how visitors use a site, such as how many people visit, which pages they view and how long they stay, so the site can be improved.

Depending on the law that applies and whether the data is anonymized, analytics cookies may require your consent.

Profiling cookies

Profiling cookies track your activity, sometimes across different websites, to build a profile of your interests. They are typically used to show targeted advertising, measure how well ads perform or personalize content. They include advertising, marketing and social media cookies.

Profiling cookies require your consent.

**B. By who sets them****First-party cookies**

First-party cookies are set directly by the website you are visiting.

Third-party cookies

Third-party cookies are set by another company through the website you are visiting, for example an analytics provider, a social network or an advertising network. That company's own privacy policy governs how it uses the information it collects.

C. By duration**Session cookies**

Session cookies are deleted when you close your browser.

Persistent cookies

Persistent cookies stay on your device for a set period, or until you delete them.

Cookies used by the Website

The Website does not use analytics, profiling or third-party cookies. Here is a summary:

Type of cookie	Used on the Website	Details
Technical cookies (first party)	Only where strictly necessary	Used only if needed for the Website to work. They do not track you and do not require your consent.
Analytics cookies	No	Any measurement of visits relies on tools that do not use cookies and report aggregated statistics only (see Section 2.e)).
Profiling cookies	No	We do not use advertising, marketing or social media cookies.
Third-party cookies	No	We do not allow other companies to set cookies through the Website.

If this changes, we will update this table and, where required, ask for your consent through a cookie banner before setting any cookie that needs it.

Cookie settings

You can block or delete cookies at any time through your browser settings. Please note that if you block technical cookies, parts of the Website may not work properly.

Your cookie settings apply only to the browser and device you are using, so you will need to set them on each browser and device you use to access the Website.



You can find information on how to manage cookies in the most common browsers via the following links:

- [Chrome](#)
- [Firefox](#)
- [Safari](#)
- [Microsoft Edge](#)

With regard to your rights under Data Protection Laws, please refer to Section 7 above.

9. Changes

We may update this Policy from time to time, for example to reflect changes in Data Protection Laws or in how the Website works. When we do, we will post the updated Policy on the Website and change the date below.

Last updated: September 10, 2026
