

AUTHENTIC JOURNEY

17635966 Canada Inc.

PRIVACY POLICY

Authentic Journey AI Receptionist Platform

Effective: February 9, 2026 | Version 3.1 | Revised: March 2026 | SMS Programme Added

1. Introduction

17635966 Canada Inc. (operating as Authentic Journey) is committed to protecting the privacy and personal information of our clients, website visitors, and the individuals who call our clients' AI receptionists. This Privacy Policy explains how we collect, use, disclose, and safeguard personal information in compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA) and other applicable Canadian privacy laws.

Our Contact Information: 15-75 Bayly St W, #1029, Ajax, ON L1S 7K7, Canada | Phone: 1-888-218-5642 | Email: allistair@authentic-journey.com | Website: <https://authentic-journey.com>

2. Scope of This Policy

This Privacy Policy applies to:

- Website visitors to <https://authentic-journey.com>
 - Clients who subscribe to our AI receptionist services
 - Callers whose calls are handled by our AI agents on behalf of our clients
 - Prospective clients who inquire about our services
 - Individuals who submit our SMS opt-in form or consent to receive SMS communications from us
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3. What Personal Information We Collect

3.1 Information from Clients (Business Subscribers)

When you sign up for our services, we collect: business name and legal entity information; contact person name, email address, and phone number; business address and business registration number (if applicable); payment information (processed through secure third-party payment processors); and service configuration including business information for AI knowledge base, website URLs, call routing preferences, voicemail scripts, FAQ content, and contact preferences.

3.2 Information from Callers (People Who Call AI Agents)

When someone calls a phone number serviced by our AI agents, we collect: caller's phone number (Caller ID); call recording (audio file) and call transcription (text); call duration and timestamp; caller's name, email, and business name (if provided during the call); and information disclosed during the call. All callers are informed at the beginning of each call that: (1) the call is being recorded; (2) they are speaking with an AI receptionist, not a human; and (3) their information may be processed by service providers outside Canada. By choosing to continue, callers provide consent to recording and AI processing.

3.3 Information from Website Visitors

When you visit our website, we automatically collect: IP address, browser type and version, device type and operating system, pages visited and time spent, referring website, and approximate geographic location (country/region). We use cookies to improve website functionality. You can control cookies through your browser settings.

3.4 Information Collected for SMS Communications

When you opt in to receive SMS messages from us, we collect: your mobile phone number; your name (if provided); your consent record including the date, time, and method of opt-in; and any preferences you indicate regarding message types.

4. How We Use Personal Information

4.1 Use of Client Information

Provide Services (set up and operate AI receptionist services); Account Management (communicate service updates, provide customer support); Billing (process payments, send invoices, manage subscriptions); Service Improvement (analyse performance, improve AI accuracy, develop new features); Legal Compliance (comply with legal obligations, respond to legal requests, enforce our Terms).

4.2 Use of Caller Information

Provide Services (answer calls, qualify leads, schedule appointments on behalf of clients); Deliver Information to Clients (provide call recordings, transcripts, and caller details to the subscribing business); Quality Assurance (monitor and improve AI agent performance); AI Model Training (train and improve AI models using Anonymized Data only; clients may opt out; insurance clients are subject to a complete prohibition).

4.3 Use of SMS Information

We use mobile phone numbers and SMS consent records solely to:

- Send appointment confirmations, reminders, and service-related notifications
- Send follow-up messages related to calls handled by our AI receptionist
- Send marketing and promotional messages (only where separate express consent has been provided)
- Maintain records of consent for regulatory compliance purposes

We do NOT sell, rent, share, or transfer your mobile phone number or SMS consent information to third parties for their marketing purposes. SMS consent and mobile phone numbers will not be shared with third parties or affiliates for marketing purposes.

4.4 Use of Website Visitor Information

Operate our website and deliver content; analytics (understand visitor behaviour and improve user experience); security (detect and prevent unauthorised access).

5. How We Share Personal Information

5.1 Sharing with Clients

When someone calls a phone number serviced by our AI agent, we share that caller's information (name, phone number, email, call recording, transcript) with the client who subscribed to our service for that phone number. Our clients are responsible for: complying with privacy laws when using caller information; obtaining any additional consents required for their business; and protecting caller information they receive from us.

5.2 Sharing with Service Providers (Sub-Processors)

We engage third-party service providers to help us deliver our Services: GrowthHub365 — AI platform provider and phone system infrastructure; OpenAI or Anthropic — AI language processing; Zoho Mail — Email services; Payment processors (Stripe, Square) — transaction processing. We require all sub-processors to protect personal information consistent with this Privacy Policy and our Data Processing Addendum. We notify clients of changes to sub-processors with at least 30 days advance notice.

SMS IMPORTANT: We do NOT share your mobile phone number or SMS opt-in consent with any third party for their marketing or promotional purposes under any circumstances.

5.3 Sharing for Legal Reasons

We may disclose personal information without consent when required or permitted by law: in response to court orders, subpoenas, or warrants; to comply with lawful law enforcement requests; to protect against fraud, security threats, or illegal activity; or to enforce our Terms of Service.

5.4 Business Transfers

If Authentic Journey is involved in a merger, acquisition, sale of assets, or insolvency, personal information may be transferred to the successor entity. We will provide at least 30 days notice before your information is transferred and becomes subject to a different privacy policy.

6. SMS Communications Programme

6.1 SMS Programme Description

Authentic Journey operates an SMS messaging programme to communicate with clients and callers regarding appointment confirmations, missed call alerts, callback reminders, and service-related updates. Where separate consent is provided, we may also send occasional marketing and promotional messages.

6.2 How We Obtain SMS Consent

We obtain SMS consent through the following methods:

- Verbal opt-in during a recorded phone call — callers are informed they may receive follow-up SMS messages and verbally confirm their consent before any SMS is sent
- Web form opt-in — individuals may complete our SMS consent form at <https://authentic-journey.com/compliant-optin-form>, which includes explicit consent checkboxes

Consent is always voluntary. You are never required to provide SMS consent to receive our core services.

6.3 Types of SMS Messages We Send

We send two categories of SMS messages:

- Service Messages (transactional): appointment confirmations, missed call notifications, callback reminders, and service-related updates. These are sent based on your service relationship with us.
- Marketing Messages (promotional): occasional messages about our services, offers, or updates. These are sent only where you have provided separate express written consent.

6.4 Message Frequency

Message frequency varies based on your activity and service usage. For service messages, you may receive messages whenever a relevant event occurs (e.g., a missed call). For marketing messages, we send no more than 4 messages per month. We will always inform you of expected message frequency at the time of opt-in.

6.5 Message and Data Rates

Standard message and data rates may apply to SMS messages sent to or received from us. These rates are determined by your mobile carrier and are not charged by Authentic Journey. Please check with your mobile carrier if you are unsure about applicable rates.

6.6 How to Opt Out (STOP)

You may opt out of SMS messages at any time by replying STOP to any message you receive from us. Upon receiving your STOP reply:

- We will send one final confirmation message acknowledging your opt-out
- You will be removed from our SMS list immediately
- No further SMS messages will be sent to your number unless you re-consent

You may also opt out by contacting us at: Email: allistair@authentic-journey.com | Phone: 1-888-218-5642

6.7 How to Get Help (HELP)

If you need assistance with our SMS programme, reply HELP to any message. You will receive a response with support information. You may also contact us directly at: Email: allistair@authentic-journey.com | Phone: 1-888-218-5642

6.8 No Sharing of SMS Consent Information

Your mobile phone number and SMS opt-in consent information will not be sold, rented, leased, or shared with any third party for their marketing or promotional purposes. This prohibition is absolute and applies regardless of any other provision in this Privacy Policy.

6.9 SMS Data Retention

We retain SMS consent records for a minimum of 4 years from the date of consent or last message sent, whichever is later, to comply with carrier requirements and applicable regulations. Mobile phone numbers are deleted upon opt-out confirmation unless retention is required by law.

6.10 Supported Carriers

Our SMS programme supports all major Canadian and North American wireless carriers. Carrier support is not guaranteed for all carriers. Message delivery is subject to carrier availability and network conditions.

7. Cross-Border Data Transfers

Personal information processed through our Services may be transferred to and stored in jurisdictions outside Canada, including the United States and India. Our AI technology partners (OpenAI, Anthropic) and phone infrastructure provider (GrowthHub365) operate servers in the United States. To ensure meaningful consent, every call begins with the following AI-delivered disclosure before any personal information is collected:

"Thank you for calling [Client Business Name]. I am an AI receptionist — not a human. This call is being recorded. Information you share will be provided to [Agent/Client Name] and may be processed by service providers outside Canada, including in the United States. You may continue with me now, or I can note your number for a callback from [Agent/Client Name] during business hours. How would you like to proceed?"

By choosing to continue after this disclosure, callers consent to recording, AI processing, and cross-border data transfer. Callers are never required to continue — a human callback option is always offered. Data protection measures include: encryption in transit (TLS 1.2+); encryption at rest (AES-256); contractual data protection agreements with all international service providers; and regular security audits.

8. How We Protect Personal Information

We implement technical, physical, and organisational security measures to protect personal information: Encryption — all call recordings encrypted in transit (TLS 1.2+) and at rest (AES-256). Access Controls — multi-factor authentication for all administrative access. Secure Infrastructure — hosting on SOC 2 compliant platforms. Regular Security Audits — annual third-party penetration testing and quarterly internal reviews. Need-to-Know Basis — employee access limited to those who need it to perform their job. Confidentiality Agreements — all employees, contractors, and sub-processors sign confidentiality agreements. Incident Response Plan — documented and tested procedures for detecting, responding to, and reporting data breaches.

9. Data Retention

9.1 How Long We Keep Information

Client Account Information: retained for the duration of your subscription; retained for 7 years after account closure for legal and tax compliance. Call Recordings and Transcripts (General Clients): retained for 90 days by default; configurable between 30 days (minimum) and 12 months (maximum). Call Recordings and Transcripts (Insurance Clients): may be retained for up to 7 years where the client has selected extended retention to meet RIBO and applicable regulatory record-keeping requirements. SMS Consent Records: retained for a minimum of 4 years. Anonymized call data: may be retained indefinitely for AI training and service improvement, subject to the insurance client AI training prohibition. Website Analytics: aggregated anonymized analytics retained indefinitely; IP addresses and identifiable visitor data

deleted after 12 months. Payment Records: retained for 7 years for accounting and tax compliance.

9.2 Deletion Upon Request

You may request deletion of your personal information at any time (subject to legal retention requirements). See Section 11 for how to exercise this right.

10. Cookies and Tracking

Our website uses cookies and similar tracking technologies to improve your browsing experience and analyse website traffic. We use the following types of cookies:

- Strictly necessary cookies: required for the website to function properly. These cannot be disabled.
- Analytics cookies: help us understand how visitors use our website. These are anonymized and do not identify individuals.
- Functional cookies: remember your preferences to improve your experience.

You can control cookies through your browser settings. Disabling cookies may affect website functionality. We do not use cookies for advertising or third-party tracking purposes.

11. Consent

11.1 How We Obtain Consent

Clients (Business Subscribers): We obtain express consent from business clients through the signed Service Agreement. Callers (People Who Call AI Agents): We obtain meaningful consent through our mandatory AI disclosure at the start of every call. SMS Recipients: We obtain express consent through verbal opt-in during recorded calls or through our web opt-in form. Website Visitors: We rely on implied consent for the collection of website usage data necessary to operate our website.

11.2 Withdrawing Consent

Clients: cancel your subscription per the Terms of Service termination procedures. Callers: hang up during a call, or request deletion of your call recording. SMS Recipients: reply STOP to any SMS message or contact us at allistair@authentic-journey.com. Website Visitors: stop using our website or disable cookies in your browser. Withdrawing consent may prevent us from providing Services.

12. Your Privacy Rights

Under PIPEDA and applicable Canadian privacy laws, you have the following rights: Right to Access; Right to Correction; Right to Deletion; Right to Portability (CSV or JSON format); Right to Object; Right to Withdraw Consent; Right to Complain to the Office of the Privacy Commissioner of Canada.

To exercise your rights: email allistair@authentic-journey.com with subject line "Privacy Rights Request" and describe the right you wish to exercise. We will respond within 30 days.

Office of the Privacy Commissioner of Canada: 30 Victoria Street, Gatineau, QC K1A 1H3 | Toll-free: 1-800-282-1376 | <https://www.priv.gc.ca>

13. Children's Privacy

Our Services are not intended for children under 18 years of age. We do not knowingly collect personal information from children. Our SMS programme is available to individuals aged 18 and over only. If you believe we have inadvertently collected information from a child, please contact us immediately and we will delete it.

14. Data Breach Notification

In the event of a data breach that poses a real risk of significant harm to individuals, we will: notify affected individuals within a reasonable time after discovering and confirming the breach; notify the Office of the Privacy Commissioner of Canada as required by PIPEDA; and provide details including the nature of the breach, affected information, steps we are taking, and recommended protective steps for individuals.

15. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Material changes: at least 30 days advance notice by email and/or prominent notice on our website. Minor changes: posted to our website with updated date. Your continued use of our Services after changes take effect constitutes acceptance.

16. Contact Us

17635966 Canada Inc. (operating as Authentic Journey)

Address: 15-75 Bayly St W, #1029, Ajax, ON L1S 7K7, Canada

Phone: 1-888-218-5642

Email: allistair@authentic-journey.com

Website: <https://authentic-journey.com>

Privacy Policy: <https://authentic-journey.com/privacy-policy>

Terms of Service: <https://authentic-journey.com/terms-of-service>

SMS Opt-In Form: <https://authentic-journey.com/compliant-optin-form>

17. Acknowledgment

BY USING OUR SERVICES, WEBSITE, OR SMS PROGRAMME, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTOOD, AND AGREE TO THE COLLECTION, USE, AND DISCLOSURE OF YOUR PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.

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