

Privacy Policy

Influencer Impact Inc. • influencerimpact.co

Last Updated: 21 June 2026

Influencer Impact Inc. (“Influencer Impact”, “we”, “us”, or “our”) is a corporation incorporated under the laws of the Province of Ontario, Canada. This Privacy Policy explains how we collect, use, disclose, retain, and safeguard personal information in connection with the website located at influencerimpact.co (the “Platform”). It is intended to comply with the Personal Information Protection and Electronic Documents Act (Canada) (“PIPEDA”), the privacy laws of the Province of Ontario, and, in respect of Quebec-resident individuals, the Act respecting the protection of personal information in the private sector, as amended by Law 25 (“Law 25”).

Capitalized terms used and not defined in this Privacy Policy have the meanings given to them in our Terms and Conditions.

1. Privacy Officer

Influencer Impact has designated a Privacy Officer who is responsible for compliance with this Privacy Policy and with applicable privacy laws. The Privacy Officer also serves as the “person in charge of the protection of personal information” for the purposes of Quebec Law 25. You may contact the Privacy Officer at:

Influencer Impact Inc.

Attention: Laik Sweeney

Email: [laik@influencerimpact.co]

Postal: 1282 Snyder’s Road W, Baden, Ontario N3A 3K8, Canada

2. Scope and Who This Applies To

This Privacy Policy applies to personal information that Influencer Impact collects about: (a) individuals who apply for membership; (b) Verified Members; (c) visitors to the Platform; and (d) influencers who are the subject of profiles or Reviews on the Platform (whether or not they have any other relationship with Influencer Impact).

3. Personal Information We Collect

3.1 Information Collected from Applicants During Vetting

When you apply for membership, we collect:

- your full name, business email address, and (optionally) phone number;

- your employer or agency, job title, and the country and province or state in which you work;
- links to your professional online presence (e.g., LinkedIn, company website);
- any other information you choose to provide during the application or follow-up correspondence.

3.2 Information Collected from Verified Members

After your application is approved, we collect:

- account credentials and authentication metadata (e.g. hashed password)
- the displayable years-of-professional-experience badge derived from your application;
- the Reviews you submit, including the textual content, ratings on the five criteria, the influencer to whom each Review relates, and timestamps;
- flags you submit and any related correspondence;
- communications with Influencer Impact (e.g., support requests); and
- logs of your activity on the Platform, including authentication events, page and content accessed, and IP and device information.

3.3 Information Collected from Visitors

When anyone visits the Platform, we collect limited information including IP address, browser type and version, operating system, referring page, and the timestamps and URLs of pages visited. We use this information for security, troubleshooting, and analytics purposes as described in Section 4.

3.4 Influencer Data

We collect personal information about individual influencers from two sources:

- information entered by Verified Members in connection with their Reviews (for example, the influencer's name or handle, the campaign or engagement type, and the Member's observations and ratings); and
- information that Influencer Impact imports from publicly available third-party sources (for example, public profiles on social media platforms), including the influencer's display name and handles, public bio information, follower counts, engagement metrics, and content category.

Our legal basis for collecting and using Influencer Data without the influencer's express consent rests on PIPEDA's exception for publicly available information (in respect of the publicly available components) and on our legitimate interests (and those of the Verified Member community) in operating a closed professional reference network for the marketing and public-relations industry, balanced against the privacy interests of the influencer. We do not collect special categories of personal information about influencers, and we do not infer or store

information about an influencer's race, ethnicity, religion, health, political views, or sexual orientation.

We do not sell, rent, or trade Influencer Data. Influencers have rights of access, correction, and removal as set out in Section 11.

3.5 Cookies and Similar Technologies

The Platform uses strictly necessary cookies to authenticate Verified Members, maintain session state, and enforce security. We may also use a limited number of first-party analytics cookies for the purpose of measuring Platform usage and detecting abuse. We do not use third-party advertising cookies, cross-site tracking cookies, or behavioural advertising cookies.

If we adopt additional cookies or tracking technologies, including any third-party analytics provider, we will update this Privacy Policy and, where required by law, obtain your consent before doing so.

4. How We Use Personal Information

We use personal information for the following purposes:

- to evaluate membership applications and to operate the vetting process;
- to provide, secure, monitor, and improve the Platform;
- to authenticate Verified Members and to enforce access controls;
- to display Reviews and Influencer Data to Verified Members in the closed network;
- to administer the flagging and moderation processes described in our Community Guidelines;
- to communicate with Members about their account, applications, flags, and changes to our Platform or policies;
- to detect, prevent, and investigate fraud, abuse, security incidents, and violations of our Terms and Community Guidelines;
- to comply with legal obligations and to defend, exercise, or establish legal claims; and
- for analytics on aggregate Platform usage, in a manner that does not identify individual Members or influencers in external reporting.

For Quebec-resident individuals, our legal bases under Law 25 are consent (for account creation and Member-supplied information), the necessity of processing for the conclusion or performance of the membership relationship, our legitimate interests as described in Section 3.4 (for Influencer Data), and compliance with our legal obligations.

5. How We Share Personal Information

We share personal information only as follows:

- with other Verified Members, in respect of Reviews and the closed-network portions of Influencer Data (Reviews are shown only with the reviewer's years-of-experience badge; reviewer identity is not disclosed to other Members);
- with service providers that process personal information on our behalf (for example, our cloud-hosting provider, our transactional email provider, and our analytics provider, if any), under written agreements that require them to safeguard personal information and to use it only on our instructions;
- with our professional advisors (lawyers, accountants, insurers), under duties of confidentiality;
- where required to comply with a court order, subpoena, regulatory request, or other legal obligation, or to establish, exercise, or defend legal claims; and
- with a successor entity in connection with a merger, acquisition, financing, or sale of substantially all of our assets, subject to confidentiality protections.

We do not sell personal information. We do not share Reviews or the closed-network portions of Influencer Data with the public, with unverified users, or with the influencers who are the subject of the Reviews.

6. Cross-Border Transfers

Our servers and primary data hosting are located in Canada. Certain of our service providers may, however, process personal information outside Canada, including in the United States and the European Union. When personal information is processed outside Canada, it becomes subject to the laws of the jurisdiction in which it is processed, including any laws that allow access by foreign governments, courts, law enforcement, or regulators.

Quebec-resident individuals will be informed before their personal information is transferred outside Quebec where required by Law 25, and we will conduct a privacy impact assessment for such transfers as required.

7. Specific Provisions for Quebec Residents (Law 25)

In addition to the rights set out elsewhere in this Privacy Policy, Quebec-resident individuals have the following rights under Law 25:

- to be informed before personal information is communicated outside Quebec and to receive the results of any privacy impact assessment we conduct in connection with such a transfer;
- to data portability — to obtain a copy of their computerized personal information that we have collected from them in a structured, commonly used technological format, where technically feasible;

- to be informed if a decision concerning them is based exclusively on automated processing of personal information (we do not currently make such decisions on the Platform);
- to the de-indexation of personal information in certain circumstances;
- to file a complaint with our Privacy Officer and, if dissatisfied, with the Commission d'accès à l'information du Québec.

8. Security Safeguards

We use administrative, technical, and physical safeguards designed to protect personal information against loss, theft, unauthorized access, disclosure, copying, use, modification, or destruction. These safeguards include encryption in transit (HTTPS/TLS), encryption at rest for personal information, role-based access controls, multi-factor authentication for sensitive internal roles, audit logging of access to personal information, secure software-development practices, regular vulnerability assessment, and an incident-response process.

No safeguard is perfect. If we become aware of a confidentiality incident or a breach of security safeguards that creates a real risk of significant harm, we will notify affected individuals and, where required, the Office of the Privacy Commissioner of Canada, the applicable provincial privacy commissioner (including the Commission d'accès à l'information du Québec for Quebec residents), and any other authorities required by law.

9. Retention

We retain personal information only for as long as necessary for the purposes for which it was collected, to comply with our legal obligations, and to defend legal claims. Our standard retention periods are:

We may retain certain records for longer where required by law or where reasonably necessary to defend legal claims, subject to appropriate safeguards.

Approved-applicant vetting records: retained for the duration of Verified Membership plus twenty-four (24) months after account closure, then deleted or anonymized;

- **Declined-applicant records:** retained for six (6) months from the date of decision, then deleted (other than minimal anti-abuse records used to prevent re-application);
- **Verified Member account records:** retained for the duration of Verified Membership plus twenty-four (24) months after account closure, then deleted or anonymized;
- **Reviews and associated audit logs:** review content is retained for the life of the platform to support the legitimate interests of the reviewer community and to enable defamation defence. Author attribution is anonymized internally twenty-four (24) months after account closure, consistent with Verified Member account record retention. Moderation and audit records associated with reviews are subject to the seven (7) year flag and moderation retention period above;

- **Influencer Data (scraped from public sources):** refreshed on a rolling basis and purged twenty-four (24) months after the last verified update if no Verified Member has referenced the influencer in a Review, or earlier on a verified removal request;
 - **Flag and moderation records:** retained for seven (7) years from the date of the moderation decision;
 - **Analytics records:** aggregated and de-identified after thirteen (13) months.
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10. Your Rights

Subject to applicable law, you have the right to:

- access your personal information and request a copy of it;
- request correction of inaccurate or incomplete personal information;
- request deletion of your personal information, subject to legal or contractual retention obligations;
- withdraw consent to certain processing, subject to legal or contractual restrictions and recognizing that withdrawal may mean we can no longer provide the Platform to you; and
- complain to a privacy regulator (see Section 13).

To exercise these rights, contact our Privacy Officer using the details in Section 1. We will verify your identity before acting on a request and will respond within the timeframes required by applicable law (and in any event, within thirty (30) days, subject to any extension permitted by law).

12. No Personal Information from Minors

The Platform is intended only for adults engaged in the marketing and public-relations industries and is not directed to anyone under the age of eighteen (18). We do not knowingly collect personal information about minors. If you believe we have collected personal information about a minor, please contact the Privacy Officer and we will delete that information.

13. Complaints

If you have a complaint about our handling of personal information, please contact the Privacy Officer first. If you are not satisfied with our response, you may complain to:

- **Office of the Privacy Commissioner of Canada:** priv.gc.ca;
- **Information and Privacy Commissioner of Ontario:** ipc.on.ca;
- **Commission d'accès à l'information du Québec (Quebec residents):** cai.gouv.qc.ca.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. The “Last Updated” date at the top of this Privacy Policy indicates when it was last revised. If we make a material change, we will provide reasonable advance notice through the Platform or by email.