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## ANTI-SPAM POLICY

### **Purpose/Rationale:**

The purpose of this Canada's Anti-Spam Legislation Policy (the "Policy") is to outline the roles and responsibilities of She Thrives Inc. and its employees to ensure compliance with the provisions of Canada's Anti-Spam Legislation and its associated regulations (collectively referred to as "CASL").

### **Scope:**

This Policy applies to all full-time, part-time, contract and casual employees and independent contractors of She Thrives, and/or any other persons who represent She Thrives or have been given access to a She Thrives email account, all of whom are collectively referred to herein as "personnel".

Specifically, this Policy applies to all personnel of She Thrives, including third parties acting on She Thrives' behalf when:

1. Sending electronic messages from any She Thrives account or She Thrives owned domain name for the purpose of promoting, advertising, marketing, or selling a She Thrives product or service or promoting She Thrives' brand(s) (referred to under CASL as "commercial electronic messages" or "CEMs");
2. Receiving opt-out/unsubscribe directives to unsubscribe an electronic address from receiving future CEMs;
3. Altering the transmission data of electronic messages; or
4. Installing computer programs onto another person's personal computer system (i.e. home computer) during the course of commercial activity. This includes installing malware or computer programs that the user did not consent to.

### **Definitions:**

*Altering transmission data:* Manipulating or changing the transmission data (e.g. the electronic address in the "To:" line of an email message) so that the electronic message is



delivered to a destination/recipient that is different than or in addition to that which was indicated to the sender, unbeknownst to and without the sender's express consent.

**Commercial activity:** Anything of a commercial nature (e.g. an activity that promotes a product(s), good(s), or service(s) to a person(s) or encourages a person(s) to engage in the purchase of a product(s), good(s), or service(s)), whether or not there is an expectation of profit.

**Commercial electronic messages (CEMs):** Electronic messages (e.g. text (SMS/MMS), sound, voice or image) sent to an electronic address (e.g. email, instant messaging, telephone account, or any similar account) that, based on the message content, links, or contact information in the message, encourages participation in a "commercial activity".

**Computer program:** Data representing instructions or statements that, when executed in a computer system, causes the computer system to perform a function.

**Express consent:** Permission that is specifically given by an individual to receive messages, which has been documented in writing.

**Implied consent:** Consent that can be inferred based on the nature of the service being provided, that the individual is knowingly giving permission.

**Social media:** Digital technologies and practices that enable people to use, create, and share content in many forms, including text, images, audio, video, and other multimedia communications. Examples include blogs, social networking websites such as Facebook, Twitter and LinkedIn, and video sharing websites such as YouTube.

**Transmission data:** The information about where, how, and when electronic communication is sent (e.g. the sender's and recipient's domain/email address/phone number, the date/time the message was sent, etc.).

**Third Party:** A Third Party is an entity or individual that supplies a particular service or commodity to She Thrives. The terms third party, third party provider, service provider, affinity partner, vendor and supplier and consultant can be used interchangeably.

## **Policy:**

### **1. General Principals:**

#### **1.1 Sending CEMs**

Every person governed by this Policy will be responsible for ensuring they meet prescribed CASL requirements for the sending of CEMs and unsubscribing an electronic address from receiving future CEMs.



All outbound CEMs will:

1. Have the requisite (implied or express) consent from the recipient;
2. Identify She Thrives as sending the message;
3. Include requisite She Thrives contact information; and
4. Provide an easy method for recipients to opt out of receiving CEMs from She Thrives

#### 1.2 Sending messages via Social Media platforms

Direct messages via social media<sup>[1]</sup> may only be sent if the direct message is in response to an inquiry or a question. Additionally, only She Thrives personnel or any third parties acting on behalf of She Thrives who have been specifically authorized to do so may use external Social Media channels to communicate for She Thrives' business purposes

#### 1.3 Consent

All personnel will ensure they have prior implied or express consent to send a CEM to an electronic address, unless the CEM is exempt. Please see the CASL CEM and Consent Procedure for more information on consent requirements and exempt CEMs.

#### 1.4 Messaging Formalities

All CEMs sent by personnel (including when using third parties to send CEMs on behalf of Nourish) will be sent in accordance with the requirements outlined in the CASL CEM and Consent Procedure.

#### 1.5 Obtaining Express Consent to Send CEMs

Express consent must detail:

1. The purpose for which the consent is being sought;
2. That She Thrives is requesting consent;
3. The contact information of She Thrives; and
4. A statement that consent can be withdrawn at any time.

Please see the CASL CEM and Consent Procedure for more information and sample templates on how to obtain express consent.



### 1.6 Documenting and Storing Consent

Real-time verbal consent (i.e., express consent obtained orally) and written proofs of consent must be stored in each guest's portfolio for a minimum of three (3) years.

### 1.7 Checking for Unsubscribe

Personnel will verify and respect the unsubscribe status of electronic addresses before sending any CEMs.

### 1.8 Honouring Unsubscribe Requests

Unsubscribe requests must be honoured within ten (10) business days of receipt and electronic mail lists must be updated accordingly.

### 1.9 Emails to Foreign Countries

When sending CEMs to recipients outside of Canada, She Thrives will comply with the requirements of CASL.

### 1.10 Third Party Referrals

Initial third party referral messages may be sent without consent, following a third party referral (in accordance with the CASL CEM and Consent Procedure).

## **3. Employee Training and Awareness:**

The Chief Empowering Officer and Chief Alchemy Officer are responsible for ensuring that She Thrives Personnel receive CASL awareness training.

The Chief Empowering Officer will act as first point of contact for CASL-related questions. Personnel will be provided training regarding CASL as appropriate upon hiring and on an on-going basis as needed.

## **4. Monitoring and Control:**

The Chief Empowering Officer is responsible for monitoring overall compliance with this Policy.

## **5. Exception Management:**

Departures from this Policy require prior written approval from the She Thrives owners and will be reviewed with specific regard to assessing the impact to She Thrives and consistency



with applicable legal requirements. All exceptions will be documented and retained for audit purposes.

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[1] “Direct messages” sent via social media are sent directly to individuals at an electronic address, as opposed to “indirect messages”, which include blog posts on micro blogging and social media sites (that are not posted to an electronic address) such as LinkedIn, Facebook.