

## **PRIVACY POLICY**

The Lambton Golf & Country Club Ltd. (the “Club”) is committed to maintaining the confidentiality of information that has been provided to us by our members, customers and others. This Privacy Policy has been prepared to confirm such commitment and to assist you in understanding the type of Personal Information that we may collect from you and from others, how we may use that Personal Information, to whom we may disclose it, and how we safeguard that Personal Information and your privacy. We are committed to collecting, using and disclosing Personal Information in a responsible manner, and only to the extent necessary for the services we provide. This Privacy Policy has been developed to comply with the Personal Information Protection and Electronic Documents Act (“PIPEDA”).

### **COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION**

Personal Information means information about an identifiable individual. Personal Information would include such things as a person’s home address and telephone number, e-mail address, age, gender, height, weight, information about the person’s health, income, activities.

If the Club wishes to collect Personal Information from you, we will inform you before gathering the information, and will explain to you how we intend to use the information. The Personal Information that we typically collect from our members includes contact information (name, home address, home telephone number, cell phone number and e-mail address) as well as a member’s birth date and the name of a member’s spouse and children. The member’s contact information may be used in order to reach you to discuss the status of your membership with the Club or to inform you of Club news and activities.

In certain circumstances, PIPEDA provides that we may disclose your Personal Information without your consent. Such circumstances include: where required by law or by order of a court or tribunal; where the information is used for the purpose of collecting a debt owed to the Club; where the Personal Information is requested by a government institution to enforce any law; and in the case of an emergency that threatens the life, health or security of an individual. In such circumstances, we will not disclose more information than is reasonably necessary.

We will not sell, trade or exchange any Personal Information that we collect.

### **SECURITY OF YOUR INFORMATION**

The Club takes all reasonable precautions to safeguard your Personal Information, whether the information is kept electronically or otherwise. This involves ensuring that the only persons who view your Personal Information are those who reasonably have the need to do so, and that where necessary and appropriate, sensitive Personal Information may be locked in filing cabinets or in offices. All of our staff are trained to collect, use and disclose Personal Information only as necessary to serve our members

or customers' needs and in accordance with this Privacy Policy. Electronically, all of our computers and our computer network may only be accessed with passwords which are updated regularly.

The Club may use other agents, contractors or companies to perform services on its behalf (e.g., credit card companies, its accountants, printer, RCGA, Jonas) and such parties may have limited access to certain Personal Information that we have collected.

### **ACCESSING YOUR PERSONAL INFORMATION**

With limited exceptions as set forth in PIPEDA, you are always entitled to access the Personal Information that we have collected from you. If we cannot provide you with access to your Personal Information, we will advise you within 30 days that we are unable to do so, and as per changes to our policy will tell you, if possible, why we cannot provide you with such access.

If you believe that any factual information contained in your Personal Information is incorrect, please advise us so that we can update our records. We will not include your Personal Information in next year's membership roster upon receiving your request in writing for us not to do so.

### **USE OF OUR WEBSITE**

You can visit most pages on our website without giving us any Personal Information about yourself. However, sometimes we do need Personal Information to provide services that you request. The Club only collects Personal Information that you submit voluntarily, such as when you provide your address or other contact information that you choose to provide in order that other members of the Club may contact you. By providing us with such information, you consent to our collection and use of your Personal Information for such purposes. We will remove your Personal Information from the Club's website upon receiving your request in writing for us to do so. You may also remove this information yourself directly through our website.

Due to the nature of the internet, however, no data transmission over the internet is fully secure. Please be aware of this before you send us any information through this website as the Club cannot guarantee that any information that you transmit to us will not be intercepted and/or misused by third parties.

### **USE OF COOKIES**

Some of our web pages also use "cookies" to allow us to authenticate a user for private access to member only pages. Cookies are identifiers that a website sends to your browser and stores on your computer to streamline your next visit to our site. We also use cookies to determine the last date you visited our website and our electronic bulletin boards.

If you wish, you may be able to set your browser to notify you when you are sent a cookie. In this way, you get the option to decide whether to accept the cookie. If you choose to modify your browser in this manner, some pages of this site may not function properly.

#### **LINKS**

The Club's website may from time to time contain links to other websites that may collect your Personal Information. The Club does not assume any responsibility for their privacy practices or policies, and cannot be held liable for the actions of those third parties. You should review the privacy policies of such parties before providing them with any Personal Information.

#### **RETENTION OF INFORMATION**

We are required to maintain certain Personal Information for a period of time for various reasons, including for income tax purposes but in any event we maintain Personal Information only as long as it is required for the reasons it was collected. All Personal Information will be disposed of when appropriate, and in a manner that is secure and which respects your privacy. When we dispose of a member's or a customer's information, including Personal Information, our paper files are shredded and information kept electronically is deleted from our computers and computer network.

#### **QUESTIONS AND CONCERNS**

If you have any questions or concerns with respect to our privacy practices, please do not hesitate to call our Privacy Officer at:

Lambton Golf and Country Club Limited  
100 Scarlett Road  
Toronto, Ontario  
M6N 4K2  
Phone: (416) 767-2175 ext. 224  
Fax: (416) 767-3734  
Email: [privacyofficer@lambtongolf.com](mailto:privacyofficer@lambtongolf.com)

Our Privacy Officer will endeavour to answer your questions or concerns as quickly and completely as possible.

If you wish to make a formal complaint about our privacy practices, please forward your complaint in writing to our Privacy Officer. Who will acknowledge receipt of your complaint and ensure that the matter is investigated promptly. You will also be provided with a written notice outlining the decision reached by the Club after investigating your complaint, the reasons for such decision and any steps taken or that will be taken by the Club in connection with your complaint.

If you are unhappy with the decisions reached by the Club, or have a general inquiry about privacy legislation, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for disputes relating to the privacy legislation. You can contact the Information and Privacy Commissioner at:

112 Kent Street  
Ottawa, Ontario  
K1A 1H3  
Phone: 1 (800) 282-1376  
Fax: (613) 947-6850  
Email: [info@privcom.gc.ca](mailto:info@privcom.gc.ca)  
[www.privcom.gc.ca](http://www.privcom.gc.ca)

The Club reserves the right to amend this Privacy Policy at any time and from time to time and we encourage you to refer back to this Privacy Policy regularly. Any amendment to this Privacy Policy will apply to the Personal Information collected, used or disclosed from and after the date of such amendment.

Last updated: May, 2004