

DUNDAS VALLEY GOLF & CURLING CLUB

2007

PRIVACY POLICY

Dundas Valley Golf & Curling Club recognizes the importance of privacy and the sensitivity of personal information for all our members. For these reasons we have created the following privacy policy (the "policy"). The privacy policy outlines how we manage your personal information, the uses to which your personal information is put and how we safeguard your privacy.

Your Privacy Rights

From January 1, 2004 all businesses engaged in commercial activity must comply with the Personal Information Protection and Electronic Documents Act, and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. These obligations extend to our club and the act gives you, our members, certain rights concerning the privacy of your personal information.

Dundas Valley Golf & Curling Club is responsible for the personal information we collect and hold. To ensure this accountability, we have developed this policy and trained our staff about our policies and practices.

A. An Overview

1. What this Policy Covers

This policy covers our treatment of the personal information we collect from you.

This policy also covers our treatment of the personal information we collect from and about our employees and staff.

2. Purposes for Collection of Personal Information

Our club collects personal information for the following limited purposes:

- a) To establish and maintain member mailing lists
- b) To monitor club members
- c) For inclusion in our Club roster and production of membership cards
- d) For listing of Club roster on our web site, publishing names and events on our website and posting of tee time schedules on our web.
- e) For inclusion in our monthly news letters
- f) For posting within the club to monitor club events
- g) To maintain the employment relationship with our employees

3. How Do We Collect Your Personal Information?

We collect information only by lawful and fair means that are not unreasonably intrusive. Wherever possible we collect your personal information from you directly at the start of your membership.

In the case of our employees, we may obtain personal information on you from other sources, for example:

- * Your insurance company
- * Your accountant
- * The government

4. How is Personal Information Maintained?

Our club does not sell, barter, trade or give away your personal information to third parties. For example, we do not provide our member mailing list to other clubs.

Our club stores and maintains personal information conformity with the requirements of the Personal Information Protection and Electronic Document Act and the Model Code for the Protection of Personal Information created and approved by the Canadian Standards Association.

B. Application of the Code

Dundas Valley Golf and Curling Club applies the ten principles of the code as follows:

1. Accountability

Our club is responsible for the personal information collected and maintained by us and which is under our control. In order to fill this responsibility:

- a) We have designated officials to be responsible for the day-to-day care and control of personal information;
- b) Our staff oversees compliance with the terms of this policy;
- c) Our club has taken the following measures to ensure compliance with this policy:
 - 1. Developing procedures to protect personal information;
 - 2. Developing procedures to receive and respond to complaints and inquiries;
 - 3. Training our staff about the policies and practices respecting personal information;
 - 4. Developing and distributing information to our staff and the general public explaining our policies and procedures respecting personal information.

2. Identifying Purposes

Our club is committed to openness to you regarding the collection and use of your personal information. As discussed above we collect and use personal information for the following limited purposes:

- a) To establish and maintain member mailing lists
- b) To monitor club members
- c) For inclusion in our Club roster and production of membership cards
- d) For listing of Club roster on our web site, publishing names and events on our website and posting of tee time schedules on our web.
- e) For inclusion in our monthly news letters
- f) For posting within the club to monitor club events
- g) To maintain the employment relationship with our employees

To demonstrate this openness, we require the consent of our clients and mailing list subscribers prior to using their personal information for any purpose other than that for which it was originally collected.

If any individuals wish to be advised of the personal information we have in relation to them, they are advised to follow the procedure listed in Section C below.

3. Consent

In most cases, we shall ask you to specifically consent, if we collect, use, or disclose your personal information. Normally we ask you for your consent in writing but in some circumstances, we may accept your oral consent. Sometimes your consent may be implied throughout your conduct with us.

For example, it is the Club's position that all personal information may be collected, used and disclosed for the purposes listed in Section 2 above. If you do not wish your personal information for one such purpose please contact the club's privacy officer at the address listed in Section C below.

The club will only further disclose your personal information, without notice, only in the situations described in Section 5 below.

4. Limiting Collection

Our Club restricts the collection of personal information only to that information that is necessary for the limited purposes noted above. We are committed to collecting personal information in a fair, open and lawful manner.

For this reason, our Club does not indiscriminately collect personal information. We collect personal information to fulfill the above noted purposes only, and for no other purpose.

5. Limiting Use, Disclosure and Retention

Our Club does not use personal information for purposes other than those for which it was originally collected, unless it has first obtained the consent of the person from whom such information was received.

Further, Dundas Valley Golf & Curling Club will only disclose your personal information under the following circumstances:

- * When we are required or authorized by law to do so, for example if a court issues a subpoena;
- * When you have consented to the disclosure;
- * Where it is necessary to establish or collect fees;
- * If the information is already publicly known.

We retain personal information only for as long as it is needed and only for the fulfillment of the purposes for which it was originally collected.

6. Accuracy

Since we use your personal information to maintain our Club roster list, it is important that the information be accurate and up-to-date. If during the course of your membership any of your information changes, please inform us of such changes and we will update our records accordingly.

You may confirm the accuracy of your personal information by contacting us in writing or by e-mailing your request to the address set out in Section C below.

7. Safeguards

Our Club takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- * Premise security;
- * Restricted file access to personal information;
- * Secured databases where membership information is stored;
- * Hard copies of membership information kept in a locked office in filing cabinets.

We also ensure that any of our employees who deal with personal information are properly trained and are aware of the necessary and appropriate measures required to protect personal information.

8. Openness

Our Club makes information about its policies and practices respecting the collection and maintenance of personal information available to all interested parties.

We are pleased to answer any questions that you may have regarding the collection and maintenance of personal information. Please forward any questions in writing or by e-mail to the address set out in Section C below.

9. Individual Access

You may ask for access to any personal information, which we hold about you. However, we reserve the right to confirm the identity of the persons seeking access to personal information before complying with any requests.

Summary information is available upon request. More detailed requests, which require archival or other retrieval costs may be subject to a nominal fee.

However, your rights to access of your personal information are not absolute.

We may deny access when;

- * Denial of access is required or authorized by law;
- * Information relates to existing or anticipated legal proceedings against you;
- * When granting you access would have an unreasonable impact on other people's privacy;
- * When to do so would prejudice negotiation with you;
- * To protect our club's rights and property;
- * When the request is frivolous or vexatious.

If we deny your request to information we shall provide you with a written explanation for such denial.

10. Challenging Compliance

Our Club has designated officials who are responsible for the day-to-day care and control of personal information. These officials will receive and respond to all information requests concerning our privacy policies or about your personal information under our care and control.

We investigate all complaints received by us and will respond in writing in a timely manner. If any complaint is found to be justified, then we will take the appropriate measures to respond to the matter to the satisfaction of the complainant.

C. How to Access or Amend Your Personal Information

1. Requests for Access

If you have any questions, or wish to access your personal information, please write to our privacy contact at:

Dundas Valley Golf and Curling Club

Attention: Denise Contestabile

P.O. Box 8240
10 Woodley's Lane
Dundas, ON - L9H 6Y6 – E-mail d.contestabile@dundasvalleygcc.com

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

112 Kent Street
Ottawa, ON
K1A 1H3
1-800-282-1376

2. Communicating With Us

You should be aware that e-mail is not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information.

D. Notes

1. Employee Information

This entire policy applies to all staff and employees of Dundas Golf and Curling Club. For that reason the use of the word "member" should also be taken to include employees or staff.

Please be advised that employee personal information is important to us and for such reasons this policy governs all aspects of the employment relationship between the parties, including but not limited to:

- a) Employee applications whether or not the employee is eventually hired by the club;
- b) All resumes;
- c) All documents, including insurance documents, found in the employee personnel file;
- d) The termination or severance of the employment.

2. Changes to This Privacy Policy

Since Dundas Valley Golf & Curling Club regularly reviews all of its policies and procedures, we may change our privacy policy from time to time.