

## **PRIVACY STATEMENT**

Cardinal will not share the information you provide with third parties without your permission except where necessary to complete the services or transactions you have requested, or as required by law.

## **ITEM FOR STAFF NEWSLETTER.**

Cardinal Golf Club complies with the Canadian Standards Association Model Code for the Protection of Personal Information. This is to ensure that all personal information of individuals in its possession is protected and used in accordance with the law. If you have any questions regarding, or to view, our Privacy Policy, please feel free to contact Bob Kilgour or Greg CeBelak.

## **CARDINAL PRIVACY POLICY**

The privacy of individuals connected with our business, including our customers, contractors, employees, franchisees and website visitors has always been of great importance to Cardinal. Keeping personal information in strict confidence is a cornerstone of our business. Regardless of how the range of products and services we offer our customers expands, and the technology we use changes, we will always strive to protect the privacy of personal information, subject to any consent an individual has provided for its use.

This policy describes the principles on which Cardinal will protect the privacy of personal information. The policy is based on the **Canadian Standards Association Model Code for the Protection of Personal Information**. This policy is part of Cardinal's commitment to ensure that all personal information of individuals in its possession is protected and used in accordance with the law. Privacy laws across Canada are evolving, and therefore this policy is subject to change.

Personal Information is any information about an identifiable person, other than the name, title, business address, and business telephone number of a person. It may include such things as a person's home address, date of birth, social insurance number, medical and financial information. With respect to customers, such information is collected primarily in connection with services and products provided by Cardinal. Employees may be asked to provide such information to

Cardinal in connection with matters relating to their employment. In all cases, Cardinal is committed to protecting the privacy of individuals and the integrity of their personal information.

### **1. Accountability**

Cardinal is responsible for personal information under its control, including any personal information disclosed to third parties for handling or administrative purposes. Cardinal has designated a Privacy Officer who is accountable for Cardinal's compliance with this Policy and with privacy legislation.

**1.1** While ultimate accountability for Cardinal's compliance with the Policy rests with the Privacy Officer and Senior Management of Cardinal, day-to-day compliance with the Policy is delegated to individuals throughout Cardinal's business.

**1.2** With respect to personal information that has been transferred to a third party for processing, Cardinal will use contractual or other means to safeguard personal information while it is being handled by a third party. These may include the examination of such third party's practices with respect to personal information,

**1.3** Cardinal has implemented internal guidelines and practices to give effect to this Policy, including:

- (a) establishing procedures to protect personal information;
- (b) establishing procedures to receive and respond to complaints and inquiries;
- (c) developing information to explain Cardinal's policies and procedures; and
- (d) training staff and communicating to staff information about Cardinal's policies and procedures.

**1.4** Cardinal has implemented practices to effectively monitor compliance with this policy across its business, including the appointment of a Privacy Officer and regional privacy coordinators and regular privacy compliance reviews.

### **2. Identifying the Purposes for which Personal Information is Collected**

Cardinal will identify the purposes for which personal information is collected at or before the time the information is collected, unless such purposes are obvious.

**2.1** Cardinal will ensure that the purposes for which personal information is collected and the way in which the information may be used are clear to the individual. In some cases, the purpose will be clear from the context of the interaction. In other circumstances, a written or verbal explanation may be required.

*For example:*

*When a customer orders a product in-store, some basic personal information may be collected, such as name and address, which is necessary to effectively serve the customer.*

Employees are required to give certain personal information that is essential to the employer-employee relationship, such as SIN and banking information for payroll deposits.

### **3. Consent**

Cardinal will not collect, use or disclose the personal information of a person without the individual's knowledge and consent, except in certain limited circumstances permitted by law, such as where immediate health of a person is at risk, or in connection with the breach of an agreement or a law.

**3.1** Cardinal will obtain consent, either express or implied, for the use or disclosure of personal information at the time of the collection of the information. In certain circumstances, consent

with respect to use or disclosure will be sought after the information has been collected but before use, particularly if Cardinal wants to use the information for a purpose not previously identified to the individual.

**3.2** Cardinal is committed to obtaining meaningful consent to the collection, use and disclosure of personal information. To achieve this aim, the purposes for which the information will be used, if not obvious, will be explained in such a manner that the individual can reasonably understand how the information will be used or disclosed.

**3.3** Cardinal will not, as a condition of the supply of a product or service, unreasonably require an individual to consent to the collection, use, or disclosure of information beyond what is required in the circumstances.

**3.4** The way in which Cardinal seeks consent may vary, depending on the circumstances and the type of information collected. In determining the type of consent that may be required, Cardinal will consider the nature of the information, the use to which the information will be put, applicable laws and the type of interaction in which the information is provided.

**3.5** Consent may be express or implied, given orally, electronically or in writing and provided by an action or inaction. Consent may be given through a legally appointed representative or a legal guardian.

*For example:*

*When a customer provides his or her personal information on a Cardinal website, he or she will be asked to consent, electronically, to certain uses of that information. This constitutes express consent.*

*Implied consent will be provided in circumstances where it is clear that the collection and use of the information is required for a specific purpose. For example, when a customer orders a product or service, such as booking a tournament, certain basic information will be collected from the customer and this will constitute implied consent for Cardinal to use that information for the purpose of processing the order.*

**3.6** An individual, subject to legal or contractual limitations, may withdraw his or her consent at any time on sufficient notice to Cardinal. Withdrawal of consent may result in Cardinal becoming unable to provide or continue to provide the person with certain services, products or benefits, and the individual will be given notice of the implications of the withdrawal of his or her consent.

*For example:*

*When using a Cardinal website, “cookies” (small data files containing information to specify preferences and provide personalized content) may be used. If a website user does not want cookies used, they may be turned off on the individual web browser. However, if a user refuses cookies, this may result in some limitations on use of the website.*

#### **4. Limits on the Collection of Personal Information by Cardinal**

The collection of personal information by Cardinal will be limited to that which is necessary for the purposes identified by Cardinal. At all times, Cardinal will collect personal information by fair and lawful means.

It is possible that Cardinal may, with the consent of an individual, collect and use information about that individual from a third party. *For instance, credit references may be checked if a customer is applying for a credit product.*

### **5. Limits on the Use, Disclosure and Retention of Personal Information by Cardinal**

Personal information will not be used or disclosed by Cardinal for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information will be retained only as long as reasonably necessary for the fulfillment of those purposes or as required by law.

### **6. Accuracy of Personal Information held by Cardinal**

Cardinal will make reasonable efforts to ensure that personal information of individuals is as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

**6.1** Personal information will not be updated without the consent of the individual and it will only be updated if it is necessary for the continued use of the personal information.

**6.2** Cardinal will make reasonable efforts to obtain information from individuals in order to update information on hand if required to fulfill the purposes for which the information was collected. Once informed by a person that personal information held by Cardinal about them is inaccurate, Cardinal will update the information as soon as possible.

### **7. Safeguarding Personal Information**

Cardinal will protect personal information by the use of security safeguards appropriate to the sensitivity of the information.

**7.1** Cardinal will employ security safeguards that will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification, regardless of the format in which the information is held.

**7.2** The nature of the safeguards used by Cardinal will vary depending on the sensitivity of the information that has been collected, the amount, distribution, and format of the information, and the method of storage of the information. A higher level of protection will safeguard more sensitive information.

**7.3** The methods of protection used by Cardinal will include:

- (a) physical measures, for example, locked filing cabinets and restricted access to offices;
- (b) organizational measures, for example, security clearances and limiting access on a “need-to-know” basis; and
- (c) technological measures, for example, the use of passwords and encryption.

**7.4** Cardinal will ensure that its employees who are in contact with personal information are trained in the appropriate protection of personal information and that they are aware of the importance of maintaining the confidentiality of personal information. Employees are required to abide by this Policy.

**7.5** If personal information is disclosed to third parties for the purpose of processing or another administrative purpose, Cardinal will make reasonable efforts to ensure that the third party uses safeguards to protect personal information which are comparable to those used by Cardinal.

### **8. Openness**

Cardinal will make available to individuals information about its policies and practices relating to the management of personal information. Cardinal is open about the policy it has to ensure the protection of personal information.

**8.1** Cardinal will make this information readily available to individuals. The information will be made available in a form that is generally understandable.

**8.2** Cardinal may make information on its policies and practices available in a variety of ways, depending on the nature of the service or product being provided and the nature of the personal information.

## **9. Individual Access to Personal Information**

Upon the receipt by Cardinal of a written request, an individual will be informed, within a reasonable time following such request, of the existence, use, and disclosure of his or her personal information and will be given access to that information. In certain limited circumstances, as permitted by law, certain information, such as that collected and held in the context of an investigation of the breach of a law or a contract, will not be disclosed to the individual. Cardinal has established procedures for an individual to follow in order to access their personal information.

**9.1** Subject to applicable laws, upon receipt of a written request from an individual, Cardinal will inform him or her whether or not Cardinal holds personal information about the individual and make reasonable efforts to indicate the source of the information. In addition, Cardinal will, upon written request, provide a summary of the use that has been made or is being made of this information.

**9.2** An individual may be required to provide sufficient information to permit Cardinal to provide an account of the existence, use, and disclosure of personal information. The information provided will only be used for this purpose.

**9.3** Upon receipt of a written request, Cardinal will provide an individual the identities of third parties to which it may have disclosed personal information about the individual and the purpose for which the information may have been disclosed to the third party.

**9.4** If an individual successfully demonstrates the inaccuracy or incompleteness of personal information held by Cardinal, Cardinal will amend the information as required. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.

**9.5** Cardinal may decline to provide an individual access to his or her information in accordance with applicable laws. If such a refusal is made, Cardinal will inform the individual of the reasons why such access has been denied, except when Cardinal is prohibited from doing so by law.

## **10. Complaints and Questions**

A person about whom personal information is kept may challenge Cardinal concerning its compliance with this Policy.

**10.1** Complaints and questions regarding Cardinal's compliance with this Policy may be made in writing to the Cardinal Privacy Officer at the Administrative Offices, with your Department Manager, or by e-mail at [bobkilgour@cardinalgolfclub.com](mailto:bobkilgour@cardinalgolfclub.com).

**10.2** Cardinal has procedures in place to receive and respond to inquiries or complaints about this Policy and its practices relating to the handling of personal information. These procedures will be provided upon request.

**10.3** If an individual is not satisfied with a response by Cardinal to a complaint, or is otherwise

not satisfied with Cardinal's policies and practices with respect to its handling of personal information, a complaint may be made to the provincial privacy commissioner of the province where the personal information of the individual is kept, or to the Federal Privacy Commissioner at 112 Kent Street, Ottawa, Ontario, K1A 1H3, 1-800-282-1376. More information can be obtained at the federal privacy commissioner's website, [www.privcom.gc.ca](http://www.privcom.gc.ca).

#### YOUR CONCERNS MATTER TO US

If you have any questions about the Cardinal Privacy Policy, or your dealings with us, you can contact the Cardinal Privacy Officer by e-mail at [bobkilgour@cardinalgolfclub.com](mailto:bobkilgour@cardinalgolfclub.com),

Or by writing to:        Privacy Officer  
                                 Cardinal Golf Club  
                                 2740 Highway 9, RR 1  
                                 Kettleby, Ont. L0G 1J0

### **ISSUES**

1. Implement practices to effectively monitor compliance
  1. (a) establishing procedures to protect personal information;
  1. (b) establishing procedures to receive and respond to complaints and inquiries;
  1. (c) developing information to explain Cardinal's policies and procedures; and
  1. (d) training staff and communicating to staff information about Cardinal's policies and procedures
3. Does the website use cookies? Is info gathered online?
  3. When a customer provides his or her personal information on a Cardinal website, he or she will be asked to consent, electronically, to certain uses of that information. This constitutes express consent.

4. An application form, for example, may give notice of the purposes
5. Record of use and disclosure
7. Security safeguards
9. Establish procedures for an individual to follow in order to access their personal information.
10. Procedures to receive and respond to inquiries or complaints about this Policy
10. Access to policy