

OAKVILLE GOLF CLUB, LIMITED PRIVACY POLICY

The Oakville Golf Club, Limited (“OGCL”) recognizes the importance of privacy and the sensitivity of personal information. We are committed to protecting any personal information we hold. This Privacy Policy outlines how we manage your personal information and safeguard your privacy. References in this Privacy Policy to “you” or “your” include all shareholders of OCGL as well as all members (“Members”) of the Oakville Golf Club (the “Golf Club”) operated by OCGL.

Your Privacy Rights

Beginning January 1, 2004, all businesses in Canada engaged in commercial activities must comply with the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) or with provincial legislation which has been deemed to be ‘substantially similar’ to PIPEDA. This legislation creates obligations that extend to private clubs, including OCGL and gives you rights concerning the privacy of your personal information.

We collect, use and disclose personal information in connection with the operating of OCGL and the Golf Club and we are accountable 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.

What is Personal Information?

Personal information is any information that identifies you, or by which your identity could be deduced. It includes information that relates to your:

- personal characteristics (e.g., gender, age, home address or phone number, family status); or
- activities or views (e.g., religion, politics, opinions expressed by you, or an opinion or evaluation of you).

Personal information is to be contrasted with business information (e.g., an individual’s business address and telephone number), which is not covered by privacy legislation.

How do we Collect your Personal Information?

We collect information only by lawful and fair means and not in an unreasonably intrusive way. We collect your personal information directly from you, at the time of your application for admission to OGCL and in the course of our operating the Golf Club.

We do not generally obtain information about you from other sources. If we were to do so, we would seek your express consent.

How do we Obtain Consent to use your Personal Information?

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

It would be rare for us to collect any personal information without your express consent, but this might occur in an emergency or where we believe you would consent if asked and it is impractical to obtain consent.

How do we Use your Personal Information?

There are four primary purposes for which we collect personal information.

Our first primary purpose for collecting personal information is to operate OGCL and the Golf Club. We may collect information about your playing patterns and participation in the Oakville Golf Club, your past scores and your opinions or preferences as to how the Golf Club should be run in the future.

A second primary purpose is to obtain home contact information, so that we can contact you in an emergency.

A third purpose is so that we can publish an annual Member's Directory, the purpose of which is to assist Members in organizing their activities at the Oakville Golf Club. If you do not wish to have your name published in the Member's Directory, you may notify us accordingly and we will delete your information from the next edition of the Member's Directory.

A fourth primary purpose is to provide you with information bulletins, newsletters, notice of special events or to make you aware of developments affecting OCGL and the Golf Club. If you do not wish to receive information of this kind, you may notify us accordingly and we will not send any further material.

Like most organizations, we also collect, use and disclose information for secondary purposes. The most common examples are:

- To invoice you for membership fees and expenses incurred at the Oakville Golf Club and to process payments or to collect accounts.
- To review member files for the purpose of ensuring that we provide high quality services to the Members.
- Like all organizations, various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as part of their mandates. In these circumstances, we may consult with professionals (e.g., lawyers, accountants) who will investigate the matter and report back to us.

We do not disclose your personal information to any third party to enable them to market their products and services.

Will we Disclose your Personal Information?

We will disclose your personal information under certain circumstances when:

- we are required or authorized by law to do so, for example, if a court issues a subpoena;
- you have consented to the disclosure;
- it is necessary to establish or collect amounts owing by you to the OCGL;
- from time to time we may engage a third party to provide administrative services to us (e.g., book-keeping, auditing, computer back-up services or archival file storage) and we ensure that any such third party is bound by our privacy policy; or
- the information is already publicly known.

Can I Update my Personal Information?

Since we use your personal information to provide our services to you, it is important that the information be accurate and up-to-date.

If during the course of any year, any of your information changes, please inform us so that we can make any necessary changes.

Is my Personal Information Secure?

We take 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:

- premises security;
- restricted file access to personal information;
- deploying technological safeguards like security software, encryption and firewalls to prevent hacking or unauthorized computer access; and
- Internal password and security policies.

Can I Access my Personal Information?

You may ask for access to any personal information we hold about you.

Summary information is available on request. More detailed requests that require archive or other retrieval costs may be subject to a nominal disbursement fee, the amount of which will not be prohibitive. We may ask you to put your request in writing.

Can I be Denied Access to my Personal Information?

Your rights to access your personal information are not absolute. We may deny access when:

- denial of access is required or authorized by law;
- granting you access would have an unreasonable impact on other people's privacy;
- it is necessary to protect OGCL's rights and property;
- the request is frivolous or vexatious.

If we deny your request for access to your personal information, or refuse a request to correct your personal information, we shall explain why.

We do not use your Social Insurance Number as a way of identifying or organizing your personal information.

Can I Request Anonymity?

When it is legal and practicable, we may offer you the opportunity to make general inquiries without providing your name (e.g., by accessing general information on our website).

Communicating with Us

When sending us personal or confidential information you should be aware that e-mail is not a 100% secure medium.

Changes to this Privacy Policy

We regularly review all of our policies and procedures and may change this Policy from time to time.

Requests for Access

If you have any questions, or wish to access your personal information, please write to our Privacy Officer, Scott Thompson, at:

Oakville Golf Club, Limited
1154 Sixth Line
Oakville, ON
L6H 6M1
Tel: 905-845-8321
Fax: 905-845-0096

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Privacy Officer. They will acknowledge receipt of your complaint, ensure that it is investigated promptly and provide you with a formal, reasoned decision in writing.

For more general inquiries, or if you are not satisfied with our response, you may contact the Information and Privacy Commissioner of Canada (the “Commissioner”). The Commissioner oversees the administration of privacy legislation in the private sector and also acts as an ombudsman for privacy disputes. The Commissioner can be reached at:

30 Victoria St,
Gatineau, Quebec, K1A 1H3

Tel: 1.800.282.1376.
Fax: 819.994.5424

Employment Inquiries

If you apply to OCGL for employment, we need to consider your personal information as part of our review process. We normally retain information from candidates after a decision has been made unless we are asked not to retain the information. If we offer you employment and you accept, the information will be retained in accordance with our privacy procedures for employee records.

Web Site

The club web site is currently set up as a source of information for members and guests. We do not gather any information from those using the site.

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