



## Privacy Policy

Golf Canada is committed to providing our members, volunteers and customers with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about individuals, protecting their personal information is one of our highest priorities.

We have always respected individuals' privacy and safeguarded their personal information. We comply fully with applicable provincial and federal privacy legislation, which set out the ground rules for how organizations may collect, use and disclose personal information.

We will inform individuals why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Privacy Policy outlines the principles and practices we will follow in protecting individuals' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of personal information and allowing individuals to request access to, and correction of, their personal information.

### Scope of this Policy:

- This Personal Information Protection Policy applies to Golf Canada, its subsidiaries, and their employees. This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Golf Canada.

### DEFINITIONS:

**Personal Information** – means information about an identifiable *individual, including name, address and other contract information, as well as membership details such as membership status, club affiliation and handicap*. Personal information does not include business contact information, which would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number.

**Privacy Officer** – means the individual designated with responsibility for ensuring that Golf Canada complies with this policy and applicable legislation.

### **Policy 1 – Collecting Personal Information:**

- Unless the purposes for collecting personal information are obvious and the individual voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- We will only collect an individual's information that is necessary to fulfill the following purposes:
  - To establish and maintain commercial and membership relationships and to provide ongoing services;
  - To understand an individual's needs and preferences;
  - To recommend programs, merchandise and services to individuals;
  - To inform you of Golf Canada programs, services and benefits
  - To develop, enhance, market and provide programs, merchandise and services;
  - To facilitate and enhance your use of our websites and applications;
  - To contact individuals for fundraising;
  - To assist us in the collection of your account;
  - To prevent fraud with respect to both you and our companies;
  - To meet legal and regulatory requirements.

### **Policy 2 – Consent:**

- We will obtain an individual's consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- Consent may be provided in writing or electronically and may be collected by an authorized representative of Golf Canada. In some cases, consent may be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the individual voluntarily provides personal information for that purpose.
- Consent may also be implied where an individual is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the individual does not opt-out.
- Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), individuals can withhold or withdraw their consent for Golf Canada to use their personal information in certain ways. An individual's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the individual in making the decision.
- We may collect, use or disclose personal information without the individual's knowledge or consent in the following limited circumstances:
  - When the collection, use or disclosure of personal information is permitted or required by law;
  - In an emergency that threatens an individual's life, health, or personal security;
  - When the personal information is considered at law to be publicly available (e.g., where published in a telephone directory);
  - When we require legal advice from a lawyer;
  - For the purposes of collecting a debt;
  - To protect ourselves from fraud;
  - To investigate an actual or anticipated breach of an agreement or a contravention of law

**Policy 3 – Using and Disclosing Personal Information:**

- We will only use or disclose an individual's personal information where necessary to fulfill the purposes identified above, or such other purposes as may be identified at the time of collection
- We will not use or disclose an individual's personal information for any additional purpose unless we obtain consent to do so.
- We will not sell member and customer lists or personal information to other parties unless we obtain your explicit consent to do so.
- From time to time, we may share personal information with third parties who have been engaged to carry out certain functions on our behalf, such as to process the mailing of information to members, or to administer certain events. In each case, we will share only the personal information required by the third party to perform the function for which they have been retained. All service providers are required to keep personal information confidential, protect it using the same safeguards as employed by Golf Canada, use it only for the purpose for which it was disclose and not disclose the information to third parties for their own use.
- In some cases, your personal information may be stored or processed outside of Canada and may therefore be subject to the laws of those countries.

**Policy 4 – Retaining Personal Information:**

- If we use personal information to make a decision that directly affects the member or customer, we will retain that personal information for at least one year so that the individual has a reasonable opportunity to request access to it.
- Subject to policy 4.1, we will retain personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

**Policy 5 – Ensuring Accuracy of Personal Information:**

- We will make reasonable efforts to ensure that personal information is accurate and complete where it may be used to make a decision about the individual or disclosed to another organization.
- Individuals may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing to our Privacy Officer, at the address provided below, and provide sufficient detail to identify the personal information and the correction being sought.
- If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the individual's correction request in the file.

#### **Policy 6 – Securing Personal Information:**

- We are committed to ensuring the security of personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- We will protect personal information using a range of measures, consistent with industry practices for the protection of similar information. These safeguards will include the following methods of protection:
  - Physical measures, such as locked filing cabinets and restricted access to offices and facilities;
  - Organizational measures, such as employee security clearances and restricted, “need-to-know” access;
  - Technological measures, such as the use of passwords, encryption and intrusion detection software.
- Any service providers performing services on our behalf must provide the same level of security safeguards as Golf Canada itself provides.
- We will use appropriate security measures when destroying member’s and customer’s personal information such as shredding of paper documents and deletion or anonymization of electronically stored information.
- We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

#### **Policy 7 – Providing Individuals Access to Personal Information:**

- Individuals have a right to access their personal information, subject to limited exceptions provided by law, such as information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial reasons, or information that is subject to solicitor-client privilege.
- A request to access personal information must be made in writing to the Privacy Officer, at the address noted below, and must provide sufficient detail to identify the personal information being sought.
- Upon request, we will also tell members and customers how we use their personal information and to whom it has been disclosed if applicable.
- We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the member and customer of the cost and request further direction from the member and customer on whether or not we should proceed with the request.
- If a request is refused in full or in part, we will notify the member or customer in writing, providing the reasons for refusal and the recourse available to the member or customer.

#### **Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual:**

- The Privacy Officer is responsible for ensuring Golf Canada’s compliance with this policy and all applicable privacy laws.
- Individuals should direct any complaints, concerns or questions regarding Golf Canada’s compliance in writing to the Privacy Officer.

Golf Canada’s Privacy Officer may be reached at the following address:

1333 Dorval Drive, Suite 1

Oakville, ON L6M 4X7

E-mail: [privacy@golfcanada.ca](mailto:privacy@golfcanada.ca)