

## **PRIVACY POLICY**

St. Catharines Golf and Country Club (the Club) is committed to maintaining the confidentiality of information that has been provided to us by our members, guests 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 & 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 and information about the person's health.

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 and e-mail address) as well as a member's birth date and joining date. The member's contact information may be used in order to reach you to discuss the status of your membership with the Club, so that other members of the Club may reach you to schedule a round of golf. Such information is also disclosed to other members on our website for the same purpose.

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; 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' needs and in accordance with this Privacy Policy.

The Club may use other certain outside service providers, including the Club's computer hardware and software providers, accountants and legal counsel, may have access to personal information although these providers are also subject to the federal legislation governing the protection of personal information. Under no circumstances does the Club sell or market its membership list to third parties.

### **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. By providing us with such information, you consent to our collection and use of your Personal Information for such purposes. Members have full control over their personal information visible to other members on the website and can edit their own profiles accordingly

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**

Cookies are identifiers that a website sends to your browser and stores on your computer to streamline your next visit to that website. We do not presently use cookies on our website.

### **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. 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 information, including Personal Information, our paper files are shredded and information kept electronically is deleted from our computers and computer network.

### **ACCURACY OF INFORMATION**

The Club will endeavour to maintain the accuracy of all information kept and that it is the member's responsibility to inform the Club promptly of any change in that information. If a member believes that personal, factual information in the Club's records may be inaccurate, that member may request access to the information by contacting our Privacy Officer, Lisa Hunt, at (905) 682-8681 ext. 226 and request appropriate amendments.

## **QUESTIONS & CONCERNS**

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

Attention: Privacy Officer, Lisa Hunt  
St. Catharines Golf and Country Club  
70 Westchester Avenue  
St. Catharines, Ontario  
L2R 3P4

Telephone: 905.682.8681

Email: [lisa@stgcc.com](mailto:lisa@stgcc.com)

If you wish to make a formal complaint about our privacy practices, please forward your complaint in writing to our Privacy Officer, Lisa Hunt. She will acknowledge receipt of your complaint and ensure that the matter is investigated promptly. She will also provide you 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.

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.