



THE ARBUTUS CLUB

PRIVACY POLICY

INTRODUCTION

Respecting privacy is an important commitment of The Arbutus Club (the "Club") to its Members, Associates and Employees. That is why The Arbutus Club Privacy Policy (the "Policy") has been developed.

The Policy is a statement of principles and guidelines that govern how the Club collects, uses, discloses and protects the personal information provided to it by its Members, Associates, and Employees.

The Policy was developed in compliance with British Columbia's *Personal Information Protection Act*, as amended and in effect today ("PIPA"), the legislation which sets out the rules for how organizations, such as the Club, can, and may, collect, use and disclose your personal information. The Club is committed to maintaining the highest standards with respect to personal information and as such, this policy is subject to review to ensure currency and compliance with PIPA, as amended from time to time.

Responsibility for compliance with the provisions of the Policy rests with the Club's Privacy Officer Brent Elkington (the "Privacy Officer") who can be reached at privacy@arbutusclub.com or 2001 Nanton Ave. Vancouver, BC V6J 4A1. Other individuals within the Club may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.

PERSONAL INFORMATION

The Club has adopted the definition of Personal Information provided by PIPA. PIPA defines "Personal Information" as:

"information about an identifiable individual and includes employee personal information but does not include: contact information, or work product information."

As set out above, Personal Information specifically includes "employee personal information". PIPA defines the following, each of which is relevant to this Policy:

Employee Personal Information: information that is collected, used or disclosed solely for the purposes reasonably required to establish, maintain, manage or terminate an employment relationship between an employee (including a volunteer) and an organization. This may include information such as name, home address, educational history and employment history. This does not include contact information or work product information.

Contact Information: information that allows an individual to be contacted at work. It includes the name, position name or title, business telephone number, business address, business e-mail and business fax number for the individual.

Work Product Information: information that is prepared or collected by an employee as part of that individual's work responsibilities, but does not include information about an individual who did not prepare or collect the information.

"Summarized Data" mean records which have been stripped of information potentially identifying individuals, and which have been manipulated or combined to provide generalized, anonymous information.

Other defined terms used herein have the meanings ascribed to them in the Club's Rules and Bylaws.

THE PURPOSES FOR WHICH THE CLUB COLLECTS, USES AND DISCLOSES PERSONAL INFORMATION

The Club collects, uses and discloses Personal Information for the following specific purposes:

- a. to review and select prospective Club Members;
- b. to review and select prospective Employees;
- c. to facilitate the provision of services necessary for it to maintain and operate the Club as an organization and business in British Columbia;
- d. to manage ongoing relationships with Members, Associates and Employees;
- e. to verify identity;
- f. to enroll a Member, Associate or Employee in a specific program;
- g. to comply with requirements established by applicable federal and provincial legislation;
- h. to comply with the requirements of professional and regulatory bodies including but not limited to Work-SafeBC and the Government of British Columbia, Employment Standards Branch;
- i. to maintain accurate membership records;
- j. to maintain employment records in order to ensure accurate salary, benefit, and related information;
- k. to monitor and assess employee performance; and
- l. to provide necessary financial information to accountants, auditors, and other professional advisers as required.

The Club does not collect, use or disclose Personal Information other than for the purposes outlined above, save and except as required by law or as such collection, use and/or disclosure is permitted by PIPA without consent. While you are generally required to consent to the collection, use, and disclosure of Personal Information, such consent is not required in certain circumstances, and in such circumstances consent will not be sought.

The Club shall specify orally, electronically or in writing the identified purposes for which Personal Information is being collected at or before the time of collection. Upon request, persons collecting Personal Information shall explain the identified purpose(es) or refer you to a designated person within the Club who will explain the purpose(es) for which the Personal Information is collected.

When Personal Information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, or is implied in the previously granted consent, your consent will be sought and obtained before the Personal Information is put to a new use.

PERSONAL INFORMATION WHICH THE CLUB CAN EXPECT TO COLLECT

The Club can be expected to collect the following Personal Information with respect to Members and Associates:

- a. name;
- b. birth date;
- c. home mailing address;
- d. names, ages, and contact information of family members;
- e. personal telephone numbers and email addresses;
- f. photograph and biometric data;
- g. product preferences;
- h. health information; and
- i. credit information.

The Club may also collect Personal Information from other sources including credit bureaus, employers or personal references, or other third parties who represent that they have the right to disclose the information.

USE AND DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTY PROVIDERS

The Club may collect, use, and disclose Personal Information as set out above. Should the Club retain a third party to provide services to the Club, and should that third party require access to Personal Information, the Club will ensure that an agreement is in place that commits the third party to adhere to this Policy.

The Club will never disclose, deliver up, rent, or sell your Personal Information to any outside organization unless consent to such use is specifically granted in advance of such disclosure.

PROTECTING PERSONAL INFORMATION

In order to protect the confidentiality of Personal Information the Club employs various reasonable security safeguards appropriate to the format and sensitivity of Personal Information. However, because risks such as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction cannot be eliminated, the Club cannot guarantee the security of your information and will not be liable for its release and any consequences of its release.

With the exception of the on-line roster, which is accessible only to Members, Associates, and Employees, only the Club's employees with a business need-to-know, or whose duties reasonably so require, are granted access to other Personal Information about Members, Associates and/or Employees.

The Club shall keep Personal Information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where Personal Information has been used to make a decision about a Member, Associate, or Employee, the Club shall retain, for a period of time that is reasonably sufficient, or as required by law, to allow for access by the Member, Associate or employee, either the ac-

tual information or the rationale for making the decision, if such access is not in breach of *PIPA*, this Policy or the Rules.

The Club shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to Personal Information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

SUMMARIZED DATA

We may also use your Personal Information to generate Summarized Data for internal use. Your identity and Personal Information will be kept anonymous in Summarized Data. Summarized Data will be used for management and planning purposes.

CONSENT

By submitting Personal Information to the Club, you agree that the Club may collect, use and disclose your Personal Information in accordance with this Policy and as permitted or required by law. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting the Club's Privacy Officer. If you refuse to deliver necessary Personal Information to the Club or if you withdraw your consent, the Club may not be able to continue to provide you with certain services and/or information which may be of value to you; please contact the Club for more information regarding the implications of withdrawing consent.

ACCURACY, ACCESSING AND CORRECTING PERSONAL INFORMATION

The Club is dedicated to ensuring that Personal Information it collects is accurate. The Club will make reasonable efforts to ensure that all Personal Information is accurate and complete.

The Club will, upon its receipt of your written request, provide you with a statement detailing the contents of the Personal Information held about you. The Club will further provide you with a summary how that information has been used or disclosed by the Club.

Should you advise that the Club's records are inaccurate, the Club will, on being satisfied that the request for correction is reasonable, amend the Personal Information in the Club's possession.

In certain situations, the Club may not be able or permitted to provide access to all of the Personal Information that it holds about an individual. For example, the Club may not provide access to information if doing so would likely reveal Personal Information about a third party or could reasonably be expected to threaten the life or security of another individual. The Club may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to employee discipline, Discipline, as that term is used in the Club's Rules, including but not limited to complaints, investigations arising out of complaints, and decisions and consequences of a review and investi-

gation by the Discipline Committee, the investigation of a complaint, breach of an agreement or a contravention of the laws of Canada or a province. In the event that the Club is unable or not permitted to grant access to Personal Information further to a request, the Club will advise why that is so, in writing.

Should you resign from employment with, or from membership with the Club, the Club retains the right to continue to use and disclose your Personal Information in accordance with both the consent you have provided and this Policy.

This Policy may be amended from time to time at the Board's sole discretion. The collection, use and disclosure of your Personal Information will be governed by the then current version of this Policy in effect at such time. Following any amendments to the Policy, a current version of the Policy will be posted on the Club's website as soon as practical.

COMPLIANCE WITH THIS POLICY

The Club shall maintain procedures for addressing and responding to all inquiries or complaints from individuals regarding the Club's handling of Personal Information. The Club's Privacy Officer shall report all complaints in respect of the Club's handling of Personal Information to the Executive Committee Executive Committee within 48 hours of receipt of each such complaint.

The Club shall investigate all complaints concerning compliance with this Policy. If a complaint is found to be justified, the Club shall take appropriate measures to address and/or resolve address and/or resolve the complaint including, if necessary, amending this Policy and the Club's procedures should this Policy and the Club's procedures be found, by the Executive Committee, to be deficient in responding to any such complaint should this Policy and/or the Club's procedures be found, by the Executive Committee, to be deficient in responding to any such complaint. An individual who brings such a complaint shall be informed of the outcome of the investigation regarding his or her complaint.

ADDITIONAL INFORMATION

For more information regarding the Policy, please contact the Privacy Officer at privacy@arbutusclub.com or 2001 Nanton Ave. Vancouver, BC V6J 4A1.

Information is also available from the Office of the Information and Privacy Commissioner of BC at www.oipc.bc.ca.