

Jericho Tennis Club's Privacy Policy

1. Introduction

At Jericho Tennis Club (the "Club"), respecting privacy is an important part of our commitment to our Members, Prospective Members, and Employees. That is why we have developed Jericho Tennis Club's Privacy Policy (the "Policy").

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 and Employees.

The Policy in effect today was developed in compliance with B.C.'s *Personal Information Protection Act*, SBC 2003, c. 63, as amended ("*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, Raj Mutti, (the "Privacy Officer") who can be reached at privacy@jerichotennisclub.com or 3837 Point Grey Road, Vancouver BC, V6R 1B3. 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.

2. Personal Information

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

Personal Information: 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.

(collectively referred to herein as "Personal Information")

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

3. The Purposes for which the Club Collects, Uses and Discloses Member 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 take appropriate and necessary action in the event of a medical emergency;
- (c) to ensure proper payment of Member dues;
- (d) to maintain accurate, complete, and current Member records and files;
- (e) to assemble and make available a complete and accurate Member Directory;
- (f) to verify identity;
- (g) to manage ongoing relationships with and between Members;
- (h) to facilitate the provision of services necessary for it to maintain and operate the Club as an organization in British Columbia; and
- (i) to provide necessary financial information to accountants, auditors, and other professional advisers as required.

4. The Purposes for which the Club Collects, Uses and Discloses Employee Personal Information

- (a) to review and select prospective Employees;
- (b) to manage ongoing relationships with and between Employees;
- (c) to verify identity;
- (d) to comply with requirements established by applicable federal and provincial legislation;

- (e) to comply with the requirements of professional and regulatory bodies including but not limited to WorkSafeBC and the Government of British Columbia, Employment Standards Branch;
- (f) to maintain employment records in order to ensure accurate salary, benefit, and related information;
- (g) to monitor and assess employee performance; and
- (h) to provide necessary financial information to accountants, auditors, and other professional advisers as required.

5. Other Collection Use and Disclosure of Personal Information

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 to 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 has been 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.

6. Personal Information which The Club Can be Expected to Collect from Members and Prospective Members

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

- (a) name;
- (b) birth date;
- (c) home mailing address and billing address;
- (d) personal telephone numbers and email addresses;
- (e) occupation and employer/company name;
- (f) other club affiliations;

- (g) names, ages, and contact information of family members including spouse and children;
- (h) type of membership;
- (i) primary interests at the Club;
- (j) personal references;
- (k) product preferences;
- (l) personal medical and health information;
- (m) emergency contact information; and
- (n) credit information.

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

7. Personal Information which The Club Can be Expected to Collect from Employees and Prospective Employees

The Club can be expected to collect the following Personal Information with respect to Employees and may collect some of the following Personal Information from prospective Employees:

- (a) résumé and or *curriculum vitae*;
- (b) name, date of birth, and contact information;
- (c) emergency contact information including the name, email, telephone number(s) of an Employee's or prospective Employee's emergency contact;
- (d) medical information, including name of treating physician and basic details of any medical conditions and/or allergies, and or injuries;
- (e) personal banking information for payroll purposes;
- (f) all relevant information, including itemized receipts, for the purpose of claimed expense reimbursement;
- (g) personal referral information from third party references;
- (h) social insurance number;
- (i) accreditations and certifications; and

- (j) educational and professional documentation and/or certification.

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

8. 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.

9. Protecting Personal Information

In order to protect the confidentiality of Personal Information the Club employs various reasonable security safeguards appropriate to the sensitivity of Personal Information including password protected computers and physically securing storage areas. While the Club is committed to the protection of Personal Information against risks such as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held, given that security and privacy risks cannot be eliminated, and that the Club cannot guarantee the security of your information, it will not be liable for its release.

With the exception of the Member Directory, which is accessible only to Members and certain designated Employees, Personal Information and Employee Personal Information will only be available and accessible to those of the Club's employees with a business need-to-know, or whose duties reasonably so require.

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 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 or employee, either the actual information or the rationale for making the decision.

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.

10. 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 Privacy 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.

11. Accuracy, Accessing and Correcting Personal Information

The Club is dedicated to ensuring that all Personal Information it collects is accurate and up-to-date. 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 of 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, Member suspension, or Member expulsion. 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 discretion. The collection, use and disclosure of your Personal Information will be governed by the current version of this Policy. Amendments to the Policy will be reflected immediately on the Club's website

12. 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 any and all inquiries and complaints in respect of the Club's handling of Personal Information to the Executive Committee within seven (7) days of receipt of each such inquiry and/or 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 the complaint including, if necessary, amending this Policy and the Club's procedures 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.

13. Additional Information

For more information regarding the Policy, please contact the Privacy Officer at privacy@jerichotennisclub.com or 3837 Point Grey Road, Vancouver BC, V6R 1B3.

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