



## Privacy Policy

Richmond Hill Country Club is a facility with fitness, wellness, spa, conference and catering services created under the laws of Ontario.

In the process of operating and managing the facility, Richmond Hill Country Club collects certain personal information from members, visitors, subcontractors and employees (hereinafter called "Individuals") and may employ or contract third party services from a variety of individuals, companies and professionals who may need access to this personal information.

Personal Information means information that is personally identifiable to Individuals. This may include, without limitation, addresses, telephone numbers, email addresses, bank account numbers, payment histories, information about his or her family, seasonal address, emergency contact names and any special needs.

This Privacy Policy is based on, and complies with, Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"). It sets out principles that Richmond Hill Country Club follows to ensure that it protects Individual's personal information when it collects, uses or discloses it in the course of carrying on its activities. All of the Richmond Hill Country Club Employees, Contracted Employees and its Directors who have access to personal information must adhere to this Policy and related procedures.

### Collection

Richmond Hill Country Club shall only collect information that is reasonably necessary for the purposes identified. The information will be collected by fair and lawful means.

Information that is typically collected includes, but is not limited to the following:

- Name
- Address – Current and Seasonal
- Telephone Numbers
- E-mail Address
- Financial Institution and Bank Account Number
- Emergency Contact and Contact Information
- Vehicle Information including License Plate Numbers
- Special Needs of Members, Employees and Subcontracted Employees

In addition, information other than as set out above may also be collected from time to time including, but not limited to:

- Video surveillance cameras are located throughout the building for security purposes and to record pedestrian and vehicular access to and within the property
- Registration of visitors, including name and time of entry

- Computerized registration of access cards or fobs recording access point, time of use and registered user of access device;
- Listing of members, employees and subcontracted employees who would require special assistance during a fire emergency and;
- Other similar lists related to security

### **Use and Disclosure**

Richmond Hill Country Club shall not authorize the use of personal information for purposes other than those in keeping with the effective operation and management without the written consent of the individual.

Richmond Hill Country Club also uses a number of employees, third party service providers, consultants and other agents that may in the course of their duties have limited access to personal information retained. These include building concierge, security staff, housekeeping staff, consultants, temporary employees or employees of third-party suppliers, auditors, lawyers and others. We restrict their access to any personal information we hold except to the extent necessary for them to reasonably perform their role on the individual's behalf. The purpose of disclosing personal information to these parties is to ensure an Individual's safety, security and reasonable enjoyment of the facility, to ensure Individual's have access to their premises and services that Richmond Hill Country Club provides, to preserve the property and to collect monies owing for the provision of services.

Personal information will only be used or disclosed for the purpose for which it was collected unless an Individual has otherwise consented, or when it is required or permitted by law. In certain exceptional circumstances, Richmond Hill Country Club may have a legal duty or right to disclose personal information without an Individual's knowledge or consent with respect to matters that concern the public's interest or in complying with a court order.

Richmond Hill Country Club may disclose information without the individual's consent when permitted by law including in situations involving medical emergencies, collection of debt and suspicion of illegal activities.

Richmond Hill Country Club shall allow an individual access to their information within a reasonable time upon receipt of a written request to view the information.

### **Accuracy & Security**

Richmond Hill Country Club will keep all personal information as accurately and as current as necessary to fulfill the identified purposes for which it was collected. Richmond Hill Country Club will update or correct any personal information held by it if the individual concerned provides Richmond Hill Country Club with particulars of any information which requires updating or correction.

Richmond Hill Country Club acknowledges the responsibility of safely maintaining accurate records. All information kept in the on-site management offices will be stored out with limited access of management personnel.

Personal information is safeguarded to protect against loss, theft or unauthorized access, disclosure, use or modification of information using physical, organizational and electronic security measures.

## **Accountability**

A copy of this policy shall be kept available in the offices of Richmond Hill Country Club and will be made available for review upon request.

Individuals may address specific concerns regarding the use or distribution of personal information to their appropriate Department or Club Director.

Richmond Hill Country Club will ensure that employees strictly comply with the Policy.

## **Questions or Concerns**

Richmond Hill Country Club has policies and procedures to receive, investigate and respond to any questions or concerns respecting this Privacy Policy or the personal information that is held. Individuals may contact the Privacy Officer with any questions or concerns or to request access to their personal information.

## **Privacy Officer**

The Privacy Officer of Richmond Hill Country Club is Michael Pasichny, Club Director, 8905 Bathurst Street Richmond Hill, Ontario, L4C 0H4. Contact at 905-731-2800 ext. \_\_ and/or [mpasichny@richmondhillcountryclub.com](mailto:mpasichny@richmondhillcountryclub.com).