



## PRIVACY POLICY

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Protecting the privacy and confidentiality of personal information is an important aspect of the way that The Toronto Golf Club conducts its business. This Privacy Policy has been prepared 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.

This Privacy Policy has been developed to comply with the Personal Information Protection and Electronic Documents Act (PIPEDA).

Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website or app.

The Toronto Golf Club assumes full accountability for the personal information within its possession and control. Mr. John Gravett, General Manager, C.O.O. has been appointed the “Privacy Officer” of all privacy matters and legal compliance with privacy laws.

### **What personal information do we collect from the people that visit our website or app?**

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. In general, you can visit our website and app without providing us with any personal information. However, there are instances where we must have your personal information in order for us to grant you an access to our protected and secured sites. This information may include registration data (your name, address, e-mail address, phone number, title, etc.), information request data and response data (“User Information”).

We collect information from you when you fill out a form, register for an event, or enter information on our website or app.



## **How do we use your information?**

We intend to use such information we collect from you for purposes of supporting your relationship with The Toronto Golf Club by improving our website in order to better serve you and to allow us to better service you in responding to your member service requests. We may also use the information to request for ratings and review of services or products.

## **How do we protect your Personal Information?**

Under no circumstances will The Toronto Golf Club sell, distribute, or otherwise disclose personal information or contact lists to third parties.

The Toronto Golf Club vows to protect personal information with the appropriate security measures, physical safeguards, and electronic precautions. The Toronto Golf Club maintains personal information through a combination of paper and electronic files.

Access to personal information will be authorized to a limited number of persons who have special access rights to such systems and are required to keep the information confidential, only for the employees of The Toronto Golf Club who require the information to perform their job duties. The Toronto Golf Club's computer and network systems are secured by complex passwords.

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.

## **How accurate is my Personal Information?**

The accuracy of the User Information is important to The Toronto Golf Club. Currently, you may review and request updates to your User Information retained by The Toronto Golf Club through our online Members Only Area. If you contact us



to correct your User Information, we will attempt to correct such inaccuracies in a timely manner.

### **How do you access your Personal Information?**

With limited exceptions as set forth in PIPEDA, you are always entitled to access the Personal Information that we have collected from you. We reserve our right to charge you a nominal fee to provide you with such access. If we cannot provide you with access to your Personal Information, we will advise you within 30 days that we are unable to do so, and will tell you, if possible, why we cannot provide you with such access.

### **Why do I require a username and password?**

As a member of The Toronto Golf Club, access to certain content on our website or app may be allowed under an OPT-IN agreement between you and The Toronto Golf Club and will require a membership number, username and/or password. In some cases failure to OPT-IN to our services and provide personal information may prevent you from accessing certain pages of the website which may contain confidential information, products, services or promotional offers. By accessing and using our protected and secured website, you agree to maintain the confidentiality of the username and password you selected to access such site.

### **Do we use ‘cookies’?**

The Toronto Golf Club uses “cookies”. Cookies are identifiers that a website sends to your browser (if you allow) and stores on your computer to streamline your next visit to that website. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.



You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

### **Do we use 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.

### **Third-party disclosure**

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety.

### **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 secured and which respects your privacy. When we dispose of a member's or a customer's information, including Personal Information, our paper files are shredded and information kept electronically is deleted from our computers and computer network.

However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy.



## Contacting Us

If you have any questions with respect to our privacy practices, please do not hesitate to call our Privacy Officer at:

The Toronto Golf Club  
1305 Dixie Rd.  
Mississauga, On  
L5E 2P5  
905-278-5255

If you are unhappy with the decision reached by the Club, or have a general inquiry about privacy legislation, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. You can contact the information and Privacy Commissioner at:

112 Kent St.  
Ottawa, Ontario  
K1A 1H3  
Phone: 1 (800) 282-1376  
Fax: (613) 947-6850  
Email: [info@privcom.gc.ca](mailto:info@privcom.gc.ca) (<mailto:info@privcom.gc.ca>)  
[www.privcom.gc.ca](http://www.privcom.gc.ca)

## Policy Updates

Please note that The Toronto Golf Club reviews and updates this Privacy Policy from time to time as needed, without notice. Therefore, you should review the terms of this policy periodically to make sure that you are aware of how The Toronto Golf Club collects and uses personal information.