

# Great Bear Heli Skiing Inc.

## Personal Information Protection Policy

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At Great Bear Heli Skiing Inc. (hereafter referred to as “GBHS”), we are committed to providing our guests, whether online or in person, with exceptional service. As providing this service involves the collection, use and disclosure of some personal information, protecting their personal information is one of our highest priorities.

British Columbia’s *Personal Information Protection Act* (“PIPA”). came into effect on January 1, 2004, and sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our guests of why and how we collect, use and disclose their personal information, obtain their consent where required, and handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, outlines the principles and practices we will follow in protecting guests’ personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our guests’ personal information and allowing our guests’ to request access to, and correction of, their personal information.

### Scope of this Policy

- Before or at the time of collecting personal information, we will identify the purposes for which information is being collected.
- We will collect and use of personal information solely with the objective of fulfilling those purposes specified by us and for other compatible purposes, unless we obtain the consent of the individual concerned or as required by law.
- We will only retain personal information as long as necessary for the fulfilment of those purposes.
- We will collect personal information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual concerned.
- Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, should be accurate, complete, and up-to-date.
- We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.
- We will make readily available to customers information about our policies and practices relating to the management of personal information.
- We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained.
- We will make reasonable efforts to ensure that our subsidiaries, affiliates and service providers adhere to the same or higher standards.

### Definitions

**Personal Information** –means information about an identifiable *individual*. Personal information does not

include contact information (described below).

**Contact information** – means information that would enable an individual at a place of business to be contacted and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

**Privacy Officer** – means the individual we designate from time to time to be responsible for ensuring that GBHS complies with this policy and PIPA.

## **Policy 1 – Collecting Personal Information**

- 1.1 Unless the purposes for collecting personal information are obvious and the guests voluntarily provide their personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect guest information that is necessary to fulfill the following purposes:
  - To verify identity; we may collect your name, number, or email and copies of identification for verification
  - To identify [guest] preferences; we may request your specific preferences related to a topic
  - To deliver requested products and services; we may require your name, email, or mailing address
  - To guarantee a travel or hotel reservation; we may require additional personal information to assist you such as: name, phone number, address, credit card information
  - To enrol the guests in a program; we may require your name, phone number, or email address
  - To send out association membership information; we may ask for your email, or mailing address
  - To ensure a high standard of service to our [guests]; we may ask for personal preference, medical information, or special requirements
  - To meet regulatory requirements; we may ask for your phone number, email, mailing, or home address

## **Policy 2 – Consent**

- 2.1 Except as set out below we will obtain guest consent before collecting, using or disclosing personal information.
- 2.2 Consent can be provided [*orally, in writing, or, electronically, and can be delivered personally or through an authorized representative*] It can also be implied where the purpose for collecting using or disclosing the personal information would reasonably be considered obvious and the guest voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a guest is given notice and a reasonable opportunity to their personal information being used for mail-outs, the marketing of new services or products, fundraising or similar purposes and the guest does not object.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), guests can withdraw or restrict their consent; however that may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the guest making the decision.
- 2.5 We may collect, use or disclose personal information without the guests knowledge or consent in the

following limited circumstances:

- when the collection, use or disclosure of personal information is permitted or required by law;
- in an emergency that threatens an individual's life, health, or personal security;
- when the personal information is available from a public source (e.g., a telephone directory);
- to the extent it is reasonably necessary to obtain legal advice;
- for the purposes of collecting a debt from the particular guests;
- to protect ourselves from fraud; or
- to the extent it is reasonably necessary to investigate an anticipated breach of contract or a contravention of law.
- To conduct client, customer, member surveys in order to enhance the provision of our services'
- To contact our [guests] directly about products and services that may be of interest;]

2.6 We will not sell guests lists or personal information to other parties [*unless we have consent to do so*].

### **Policy 3 – Retaining Personal Information**

- 3.1 If we use guests personal information to make a decision that directly affects the guests, we will retain that personal information for at least one year so that the guest has a reasonable opportunity to request access to it.
- 3.2 Subject to policy 4.1, we will retain guest personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

### **Policy 4 – Ensuring Accuracy of Personal Information**

- 4.1 We will make reasonable efforts to ensure that guest personal information is accurate and complete-
- 4.2 Guests may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the guest, the personal information in question and the correction being sought.
- A request to correct personal information should be forwarded to the Privacy Officer [or designated individual].*
- 4.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we have disclosed the personal information. If the correction is not made, we will note the guest's correction request in the file.

### **Policy 5 – Securing Personal Information**

- 5.1 We are committed to ensuring the security of guest personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 5.2 We will take reasonable security measures to protect personal information, including. the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures].
- 5.3 We will use appropriate security measures when destroying guests' personal information such as *shredding documents, and deleting electronically stored information*].
- 5.4 We will continually review and update our security policies and controls as technology changes to

ensure ongoing personal information security.

## **Policy 6 – Providing Guests Access to Personal Information**

- 6.1 Guests have a right to access their personal information, subject to limited exceptions.
- 6.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought
- 6.3 Upon request, we will also tell guests how we use their personal information and to whom it has been disclosed if applicable.
- 6.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 6.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the guest of the cost and request further direction from the guests on whether or not we should proceed with the request.
- 6.6 If a request is refused in full or in part, we will notify the guests in writing, providing the reasons for refusal and the recourse available to the guests.

## **Policy 7 – Questions and Complaints: The Role of the Privacy Officer or designated individual**

- 7.1 The Privacy Officer **or designated individual** is responsible for ensuring GBHS compliance with this policy and the *Personal Information Protection Act*.
- 7.2 Guests should direct any complaints, concerns or questions regarding GBHS compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the guest may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for GBHS Privacy Officer or designated individual:

Great Bear Heli Skiing  
PO Box 268  
Hagensborg, BC  
V0T 1H0  
Attn: Privacy Officer  
info@greatbearheliskiing.com