

# Privacy Policy

## Policy Statement and Objective

Waterloo Wellington Flight Centre has created this privacy policy in order to demonstrate a commitment to privacy and the protection of personal information. This policy has been developed in accordance with the standards set out in the *Personal Information Protection and Electronic Documents Act*.

### a) Scope

This policy applies to all personal information collected, used or disclosed by Waterloo Wellington Flight Centre during the course of its business activities, including all personal information regarding Waterloo Wellington Flight Centre Employees.

### b) Definitions

For the purposes of this policy, key terms are defined as follows:

**Personal Information:** information about an identifiable individual recorded in any form, including but not limited to such things as race, ethnic origin, colour, age, marital status, religion, education, medical, criminal, employment or financial history, address and telephone number, birth date, numerical identifiers such as Social Insurance Number, and personal views or opinions.

Note that personal information does not include the name, title, business address, business telephone number, or any other work-related information of an Employee of Waterloo Wellington Flight Centre.

**Consent:** voluntary agreement with what is being done or proposed. Consent can be either express or implied. Express consent is given explicitly, either orally or in writing, and is unequivocal. Implied consent arises where consent may reasonably be inferred from the action or inaction of the individual.

**Collection:** the act of gathering, acquiring or obtaining personal information from any source, including third parties, by any means.

**Use:** the treatment and handling of personal information at Waterloo Wellington Flight Centre.

**Disclosure:** making personal information available to others outside Waterloo Wellington Flight Centre.

### c) Policy

To protect the privacy of our Employees, Waterloo Wellington Flight Centre will adhere to the following 10 principles, which are set out in the *Personal Information Protection and Electronic Documents Act*:

1. **Accountability** – Waterloo Wellington Flight Centre is responsible for all personal information in its possession or control, including information that has been transferred to a third party for processing. Waterloo Wellington Flight Centre will use contractual or other means to provide comparable protection during such processing by a third party.

Waterloo Wellington Flight Centre makes every attempt to periodically update this Privacy Policy such that it is compliant with the governing privacy legislation, legislation administered by the Privacy Commissioner, and is in general conformity with best practices.

Should you have a question or concern about Waterloo Wellington Flight Centre's Privacy Policy or practices in this regard, please contact the Chief Privacy Officer: Bob Connors.

2. **Purpose** – Waterloo Wellington Flight Centre and those designated or contracted to act for or on Waterloo Wellington Flight Centre's behalf will identify, and document, the purposes for which personal information is collected at or before the time the information is collected. Any personal information collected will be used only for the original purpose for which it was collected. Any secondary or optional uses Waterloo Wellington Flight Centre may make of any personal information will be identified and individuals will be provided with an opportunity to reject or accept such uses. Waterloo Wellington Flight Centre will only collect information that is necessary for the identified purpose(s).
3. **Consent** – Waterloo Wellington Flight Centre will obtain the consent of an individual before collecting, using or disclosing the individual's personal information. Waterloo Wellington Flight Centre will not, as a condition of the supply of a product or service, require an individual to consent to the collection, use or disclosure of information beyond that required to fulfill explicitly specified and legitimate purposes.

Any individual who has provided Waterloo Wellington Flight Centre with his/her consent to collect, use, or disclose his/her personal information may withdraw such consent at any time by providing notice to the privacy officer.

There may be circumstances where the use and/or disclosure of personal information may be justified or permitted or where Waterloo Wellington Flight Centre is obliged to disclose information without consent.

Such circumstances may include:

- i. where required by law or by order or requirement of a court, administrative agency or other governmental tribunal;
- ii. where Waterloo Wellington Flight Centre believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group; or
- iii. where the information is public.

Waterloo Wellington Flight Centre will not sell or rent any personal information to third parties without obtaining informed consent. Generally, Waterloo Wellington Flight Centre does not sell or rent personal information in any event.

- 4. **Limiting Collection of Information** – Waterloo Wellington Flight Centre will only collect personal information necessary for the purposes it has identified.
- 5. **Limiting Use, Disclosure and Retention** – Subject to any legislated exemptions, Waterloo Wellington Flight Centre will not use or disclose any personal information for purposes other than those for which it was collected, unless the individual's informed consent is obtained. Waterloo Wellington Flight Centre will retain personal information only as long as necessary for the fulfillment of those purposes. Personal information that is no longer required by Waterloo Wellington Flight Centre to fulfill the identified purposes will be destroyed or made anonymous.

Pursuant to allowable exemptions under current legislation, Waterloo Wellington Flight Centre may disclose personal information when there is reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be violating Waterloo Wellington Flight Centre's policy, violating any law of the province of Ontario or Canada, or may be causing injury to or interference with (either intentionally or unintentionally), Waterloo Wellington Flight Centre's rights or property, other Employees, students, or anyone else who could be harmed by such activities. Waterloo Wellington Flight Centre may also disclose personal information to a collection agency for the purposes of the lawful collection of a debt owed to Waterloo Wellington Flight Centre by an Employee, student, or anyone else.

- 6. **Ensuring Accuracy** – Waterloo Wellington Flight Centre will ensure that all personal information in its possession or control is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
- 7. **Safeguards** – Waterloo Wellington Flight Centre will endeavour to maintain adequate physical, organizational, and technical security with respect to its

offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of personal information. Waterloo Wellington Flight Centre will protect personal information by restricting access to it to those Employees that Management has determined need to know that information in order that Waterloo Wellington Flight Centre may provide its products and services. Waterloo Wellington Flight Centre will take care in the disposal and destruction of all personal information in order to prevent unauthorized parties from gaining access to the information.

8. **Openness** – Waterloo Wellington Flight Centre will make readily available to individuals specific information about its policies and practices relating to the management of personal information. Such information will include:

- i. the name or title, and address of the person accountable for its policies and practices and to whom complaints or inquiries can be forwarded;
- ii. the means by which individuals may access their personal information held by Waterloo Wellington Flight Centre;
- iii. a description of the type of personal information held by Waterloo Wellington Flight Centre, including a general account of its use;
- iv. what personal information is made available to third parties; and
- v. a copy of any other information that explains Waterloo Wellington Flight Centre's policies and standards.

Individuals may acquire such information by contacting the privacy officer.

9. **Individual Access** – Upon request, Waterloo Wellington Flight Centre will inform an individual of the existence, use, source, and disclosure of the individual's personal information and will give access to that information. An individual may be required to provide sufficient information to allow the organization to provide an account of the existence, use, and disclosure of the information. An individual will be permitted to challenge the accuracy and completeness of the information and have it amended as appropriate. Waterloo Wellington Flight Centre will respond to all requests within a reasonable time (but no later than 30 days) after receipt of the request at minimal or no cost to the individual.

In situations where Waterloo Wellington Flight Centre may not be able to provide an individual access to personal information, the reasons for denying access will be provided to the individual upon request. Such reasons may include the fact that the information also relates to a third party who has not consented to its disclosure, the information is prohibitively costly to provide, or any legal, security, or commercial proprietary reasons.

When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, Waterloo Wellington Flight Centre will amend the information as required and, if necessary, transmit the amended information to third parties having access to the information. If a challenge is not resolved to the satisfaction of the individual, the substance of the unresolved challenge will be recorded by Waterloo Wellington Flight Centre and, where appropriate, will be transmitted to any third parties having access to the information in question.

10. **Challenging Compliance** – An individual who wishes to challenge Waterloo Wellington Flight Centre's compliance with the principles contained in this policy should address those concerns to the Chief Privacy Officer. All complaints will be investigated and, if found to be justified, appropriate measures will be taken, including, if deemed necessary, amending Waterloo Wellington Flight Centre's privacy policies and practices.

If an individual is not satisfied with Waterloo Wellington Flight Centre's response to a complaint, that individual may submit a complaint to the Federal Privacy Commissioner within six (6) months. Appeals from decisions of the Federal Privacy Commissioner may be made to the Federal Court of Canada within one year after the Commissioner's report or notice of discontinuance has been sent.