OUR COMMITMENT TO PRIVACY

The Capilano Golf and Country Club ("Capilano") is committed to maintaining the security, confidentiality and privacy of your personal information. This Privacy Policy documents our on-going commitment to you and has been developed in compliance with the British Columbia Personal Information Protection Act.

SCOPE OF POLICY

This Policy applies to Capilano and its collection, use and disclosure of personal information relating to its members, prospective members and the guests of members. This Policy addresses personal information about individuals and does not apply to the information collected, used or disclosed with respect to corporate or commercial entities.

This Policy does not impose any limits on the collection, use or disclosure of the following information by Capilano:

- your business contact information; and
- certain publicly available information, as addressed by applicable law.

ACCOUNTABILITY

Capilano has designated a Privacy Officer who is responsible for Capilano's compliance with this Policy. The Privacy Officer may be contacted as described below.

PURPOSES

Capilano collects personal information for purposes authorized or required by PIPA or other law and for the following reasons:

a) to allow Capilano to communicate with you and authenticate your identity;

b) to organize, facilitate and improve members' use of Capilano facilities and services, (including, for example, the capilanogolf.com website and the Capilano App);

c) to evaluate and process member applications;

d) to protect Capilano and its staff and members from fraud, theft and similar risks;

e) to maintain information about special skills and abilities of members;
f) to administer and enforce Capilano Bylaws, Rules and Regulations and operating procedures and policies;

g) to monitor, process and collect member dues and other fees;

h) to provide various services and benefits to members, including tee time reservations, access to Golf Canada handicap system accounts, access to the Member Roster, and event registration;

i) to carry out Capilano procedures such as Board of Director elections and committee selection and meetings;

j) to conduct member surveys in order to improve Capilano programs and services;

k) to comply with its obligations at law and under Capilano Bylaws; and

This information may be disclosed to members and third parties for the purposes noted above, such as service providers (e.g., bookkeepers, data processors etc.).

The above collections, uses and disclosures are a necessary part of your member relationship with Capilano. Members may choose not to be included in the Member Roster or may limit the information about them contained in the Member Roster.

When personal information that has been collected is to be used for a purpose not previously identified, Capilano will identify the new purpose and obtain your consent unless the use is authorized or required by law.

CONSENT

Capilano will obtain your consent to collect, use or disclose personal information except where Capilano is authorized or required by law to do so without consent. For example, Capilano may collect, use or disclose personal information without your knowledge or consent where:

- Capilano is collecting or paying a debt;
- Capilano is obtaining legal advice; or
- Capilano reasonably expects that obtaining consent would compromise an investigation or proceeding.

Other exceptions may apply.

Your consent can be express, implied or given through an authorized representative such as a lawyer, agent or broker.

Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify Capilano that you do not wish your personal information collected/used/disclosed for various purposes after you have received notice of those purposes) or otherwise.

You may withdraw consent at any time, subject to legal, contractual and other restrictions, provided that you give reasonable notice of withdrawal of consent to Capilano. On receipt of notice of withdrawal of consent, Capilano will inform you of the likely consequences of
the withdrawal of consent, which may include the inability of Capilano to provide certain services for which that information is necessary.

**LIMITS ON COLLECTION OF PERSONAL INFORMATION**

Capilano will not collect personal information indiscriminately and will limit collection of personal information to that which is reasonable and necessary to provide services and which is reasonable and necessary for the purposes consented to by you. Capilano will also collect personal information as authorized by law.

**LIMITS FOR USING, DISCLOSING AND RETAINING PERSONAL INFORMATION**

Your personal information will only be used or disclosed for the purposes set out above and as authorized by law.

Capilano will keep personal information used to make a decision affecting you for at least one year after using it to make the decision.

Capilano will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes.

Capilano will take due care when destroying personal information so as to prevent unauthorized access to the information.

**ACCURACY**

Capilano will make a reasonable effort to ensure that personal information it is using or disclosing is accurate and complete.

If you demonstrate the inaccuracy or incompleteness of personal information, Capilano will amend the information as required. If appropriate, Capilano will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, Capilano will annotate the personal information under its control with a note that the correction was requested but not made.

**SAFEGUARDING PERSONAL INFORMATION**

Capilano protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

Capilano will take reasonable steps, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by the suppliers and agents who assist in providing services to you or to Capilano. Some specific safeguards include:

- physical measures such as locked offices and filing cabinets;
- organizational measures such as restricting employee access to files and databases as appropriate;
• electronic measures such as passwords and firewalls; and

• investigative measures where Capilano has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed.

Note that confidentiality and security are not assured when information is transmitted through e-mail or other wireless communication. Please notify Capilano in writing if you do not want Capilano to communicate with you through these means.

Please note that service providers and similar third parties with whom Capilano may share your personal information for the purposes outlined above may be located outside of Canada. Accordingly, your personal information may therefore be accessible to law enforcement or regulatory authorities in such foreign jurisdictions according to the applicable laws of such foreign jurisdictions.

PROVIDING ACCESS

You have a right to access your personal information held by Capilano, subject to legal exceptions as described below.

Upon written request and authentication of your identity, Capilano will provide you with your personal information under its control. Capilano will also give you information about the ways in which your information is being used and a description of the individuals and organizations to whom that information has been disclosed. Capilano may charge a reasonable fee for doing so.

Capilano will make the information available within 30 days or provide written notice where additional time is required to fulfil the request.

In some situations, Capilano may not be able to provide access to certain personal information (e.g., if disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purposes of an investigation or where disclosure of the information would reveal confidential commercial information that could harm the competitive position of Capilano). Capilano may also be prevented by law from providing access to certain personal information.

Where an access request is refused, Capilano will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

COMPLAINTS

Capilano will, on request, provide information regarding its complaint procedures.

Any inquiries, complaints or questions regarding this Policy should be directed in writing to Capilano Privacy Officer.

Contact Information:

Brad Burgart

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