



PGA OF CANADA PRIVACY POLICY

COMMITMENT TO PRIVACY

Privacy of personal information is an important principle to the PGA of Canada. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary to serve our members. We strive to be open and transparent regarding how we handle personal information. This document describes our privacy policies which are based on the key principles of Ontario privacy legislation.

WHAT IS PERSONAL INFORMATION

Personal information refers to information that specifically identifies you as an individual and is provided to or collected by us. It may include, for example, your name, address, age, gender, or identification numbers. Generally speaking, the PGA of Canada will not collect, use or disclose personal information without the knowledge or consent of the individual, unless such disclosure or use is required by law, or is reasonably necessary to protect the PGA of Canada's interests against criminal activity, fraud or material misrepresentation. Personal information does not include business contact information or information that is already in the public domain.

WHY WE COLLECT AND USE PERSONAL INFORMATION

We may collect, use and disclose personal information:

- a) To maintain accurate records of our members;
- b) For member communication, service and administration;
- c) For billing purposes related to our services and for the collection of fees;
- d) For internal, external and regulatory audit or legal purposes;
- e) To advise members of special events, marketing or job opportunities;
- f) To refer members to network contacts or other consultants for professional opportunities;
- g) To answer questions from our members about our services.

CONSENT TO USE PERSONAL INFORMATION

Under most circumstances, the PGA of Canada's standard practice shall be to obtain the consent of an individual before collecting, using or disclosing personal information. Consent may be obtained in various ways. We may obtain your express consent. Express consent can be given in writing, or verbally in person or over the telephone. In some

cases, consent may be deemed or implied to exist, whereby an individual's consent is inferred from their actions and the circumstances of a particular situation. When we receive personal information from you for the purposes of providing you with our services, your consent to allow us to deal with that personal information in a reasonable manner is implied. If you are providing personal information about other individuals (such as members in your own clubs), the PGA of Canada requires that you obtain their consent prior to your disclosure of such information to the Association.

Providing us with your personal information is always your choice. When you request services from us, we ask that you provide information that enables us to respond to your request. In doing so, you consent to our collection, use and disclosure to appropriate third parties of such personal information for these purposes. You also authorize us to use and retain this personal information for as long as it may be required for the purposes described above. Your consent remains valid even after the termination of our relationship with you, unless you provide us with written notice that such consent is withdrawn.

There may be some legal exceptions and circumstances under which the PGA of Canada may not obtain consent or identify the purposes for the collection, use or disclosure of personal information. Some examples of such situations include an emergency that threatens the life, health or security of an individual, or if the Association must comply with a court order.

Notwithstanding your implied consent to allow us to deal with your personal information in a reasonable manner, if for any reason it becomes necessary for us to use or disclose personal information for a different purpose than was identified when such information was originally collected from you, it shall be the PGA of Canada's practice to make reasonable efforts to contact you in advance and obtain your consent.

SHARING PERSONAL INFORMATION WITH OTHERS

The PGA of Canada does not sell membership lists or personal information to others. Any PGA of Canada individual or other agent, including other Association members, with access to personal member information is required to adhere to this policy. The PGA of Canada limits access to personal information to those employees, members, suppliers, service providers and/or other agents who need it for use or disclosure in the conduct of PGA of Canada business. The PGA of Canada requires such employees, members, suppliers, service providers and/or other agents to keep all personal information private, confidential and secure, and to use the personal information only to carry out work on behalf of the PGA of Canada.

In certain circumstances, we may be required to provide personal information to third parties for legal or regulatory purposes.

KEEPING INFORMATION ACCURATE

It is important that your personal information is accurate and complete. Having accurate information about you enables us to give you the best possible service. With some exceptions, you have the right to access, verify and amend the information we have about you. You can help us keep personal information up-to-date by keeping us informed of any changes, such as a change of address, telephone number or any other circumstances. Remember to first update your Zone.

Despite our best efforts, errors sometimes do occur. If you identify any personal information that is out-of-date, incorrect or incomplete, let us know and we will make the corrections promptly and use every reasonable effort to communicate these changes to other parties who may have inadvertently received incorrect or out-of-date personal information from us.

HOW WE SAFEGUARD PERSONAL INFORMATION

At the PGA of Canada we employ physical, electronic and procedural safeguards to protect our systems

and all personal information under our control against unauthorized access and use. All safety and security measures are appropriate to the sensitivity level of the information collected.

Our service providers and agents, as part of their contracts with us, are bound to maintain member confidentiality, and may not use the information for any unauthorized purpose.

Our employees are governed by strict standards and policies to ensure that personal information is secure and treated with the utmost care and respect.

CONTACT INFORMATION

Please contact our Privacy Officer to obtain further information about our policies and procedures, to seek access to personal information we may have about you, or if you have any unresolved inquiries or concerns. We will respond to you promptly and do our utmost to resolve your concerns. We may need to ask you for personal information to verify your identity.

Darcy Kral Privacy Officer
PGA of Canada
13450 Dublin Line
Acton, ON L7J 2W7
t: 519.853.5450 ext. 224
f: 519.853.5449

For more general inquiries, the Office of the Privacy Commissioner of Canada oversees the administration of privacy legislation in the private sector. The Commissioner also acts as an ombudsman for privacy disputes. For more information you can visit the Office of the Privacy Commissioner of Canada website at www.privcom.gc.ca.