Personal Information Protection
Private Sector Privacy Legislation

Personal Information Protection Policy

Own The Day Limited o/a Own Your Day Travel

Personal Information Protection Policy

At Own Your Day Travel, we are committed to providing our members and clients with exceptional service. As providing this service involves the collection, use, and disclosure of some personal information about our members and clients, protecting their personal information is one of our highest priorities.

While we have always respected our members and client's privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of the Personal Information Protection and Electronic Documents Act (PIPEDA) and British Columbia's Personal Information Protection Act (PIPA). PIPEDA and PIPA, which came into effect on January 1, 2004, sets out the ground rules for how businesses and not-for-profit organizations may collect, use, and disclose personal information.

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

This Personal Information Protection Policy, in compliance with PIPEDA and PIPA, outlines the principles and practices we will follow in protecting members' and clients' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our members' and clients' personal information and allowing our members and clients to request access to, and correction of, their personal information.

Scope of this Policy

This policy also applies to any service providers collecting, using, or disclosing personal information on behalf of Own Your Day Travel.

Definitions

Personal Information –means information about an identifiable individual. Such as name, home address, home phone number, personal email address, social insurance number*, credit card information, passport number and date of birth. Personal information does not include contact information (described below).

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

Privacy Officer – means the individual designated responsibility for ensuring that Own Your Day Travel complies with this policy, PIPEDA and PIPA.

Member - An authorized representative of Own Your Day Travel or interested individual in an Own Your Day Travel member program. *

Client - Recipient of travel and/or travel related information and services by an authorized Own Your Day Travel member.

Policy 1 – Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the member and client voluntarily provides his or her 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 member and client information that is necessary to fulfill the following purposes:

- To verify identity;
- To identify member and client preferences;
- To open and manage an account;
- To deliver requested products and services;
- To guarantee a travel reservation;
- To enrol the member or client in an agreed program;
- To send out membership or travel information;
- To ensure a high standard of service to our members and clients;
- To meet regulatory requirements;
- To collect and process membership or travel payments

Policy 2 – Consent

2.1 We will obtain member and client consent to collect, use, or disclose personal information (except where, as noted below, we are authorized to do so without consent).

2.2 Consent can be provided *orally, in writing, electronically, through an authorized representative* or it can be implied where the purpose for collecting, using, or disclosing the personal information would be considered obvious and the member or client voluntarily provides personal information for that purpose.

2.3 Consent may also be implied where a member or client is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new products or services, fundraising and the member or client does not opt-out.

2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the product or service, or the withdrawal of consent would frustrate the performance of a legal obligation), members

and clients can withhold or withdraw their consent for Own Your Day Travel to use their personal information in certain ways. A member's or client's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular product or service. If so, we will explain the situation to assist the member or client in making the decision.

2.5 We may collect, use, or disclose personal information without the member's or client's 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);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law

Policy 3 – Using and Disclosing Personal Information

3.1 We will only use or disclose member or client personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:

- To conduct member or client surveys in order to enhance the provision of our services;
- To contact our members or clients directly about products and services that may be of interest

3.2 We will not use or disclose member or client personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell member or client lists or personal information to other parties.

Policy 4 – Retaining Personal Information

4.1 If we use member or client personal information to make a decision that directly affects the member or client we will retain that personal information for at least one year so that the member or client has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain member and client personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

5.1 We will make reasonable efforts to ensure that member and client personal information is accurate and complete where it may be used to make a decision about the member or client or disclosed to another organization.

5.2 Members and Clients 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 personal information and the correction being sought.

5.3 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 disclosed the personal information in the previous year. If the correction is not made, we will note the members' or clients' correction request in the file.

Policy 6 – Securing Personal Information

6.1 We are committed to ensuring the security of member and client personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

6.2 The following security measures will be followed to ensure that member and client personal information is appropriately protected:

- 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

6.3 We will use appropriate security measures when destroying member's and client's personal information such as shredding documents and deleting electronically stored information.

6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Members and Clients Access to Personal Information

7.1 Members and Clients have a right to access their personal information, subject to limited exceptions such as solicitor-client privilege, disclosure would reveal personal information about another individual, health and safety concerns.

7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.

7.3 Upon request, we will also tell members and clients how we use their personal information and to whom it has been disclosed if applicable.

7.4 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.

7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the member or client of the cost and request further direction from the member or client on whether we should proceed with the request.

7.6 If a request is refused in full or in part, we will notify the member or client in writing, providing the reasons for refusal and the recourse available to the member or client.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

8.1 The Privacy Officer is responsible for ensuring Own Your Day Travel's compliance with this policy and the *Personal Information Protection Act.*

8.2 Members and Clients should direct any complaints, concerns or questions regarding Own Your Day Travel's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member or client may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Own Your Day Travel's Privacy Officer:

Own Your Day Travel
Att: Privacy Officer
1862 Juniper Dr, Merritt, BC V1K 1J4
Ph: 1-888-688-9438