

PRIVACY POLICY



Richmond Hill Golf Club is a facility with a golf course, golf teaching academy, restaurant, driving range, Pro Shop with tournament services created under the laws of Ontario.

In the process of operating and managing the facility, Richmond Hill Golf Club collects certain personal information from clientele, visitors, subcontractors and employees (hereinafter called “Individuals”) and may employ or contract third party services from a variety of individuals, companies and professionals who may need access to this personal information. Majority of information collected from clientele is collected stored through an online registration system, Jonas.

Personal Information means information that is personally identifiable to individuals. This may include, without limitation, addresses, telephone numbers, email addresses, bank account numbers, address, emergency contact names and any special needs.

The collecting and maintenance of information is an essential part of operating our business. To this end, we recognize the importance of individuals’ rights to privacy of their personal information. In addition, we recognize the importance of collecting and disclosing this information solely for legitimate business purposes, as well as the necessity of establishing standards for the management and control of this information. Any misuse of personal information, or its disclosure without authorization from Senior Management is strictly prohibited and is grounds for dismissal.

This Privacy Policy is based on, and complies with, Canada’s Personal Information Protection and Electronic Documents Act (“PIPEDA”). It sets out principles that Richmond Hill Golf Club follows to ensure that it protects Individual’s personal information when it collects, uses or discloses it in the course of carrying on its activities. All of the Richmond Hill Golf Club Employees, Contracted Employees and its Directors who have access to personal information must adhere to this Policy and related procedures.

COLLECTION

Richmond Hill Golf Club shall only collect information that is reasonably necessary for the purposes identified. The information will be collected by fair and lawful means.

Information that is typically collected includes, but is not limited to the following:

- Name, Address, Telephone Numbers, E-mail Address
- Financial Institution and Bank Account Number
- Emergency Contact and Contact Information
- Vehicle Information including License Plate Numbers
- Special Needs of Members, Employees and Subcontracted Employees

In addition, information other than as set out above may also be collected from time to time including, but not limited to:

- Video surveillance cameras are located throughout the building for security purposes and to record pedestrian and vehicular access to and within the property
- Registration of clientele, including name and time of entry
- Computerized registration of access cards or fobs recording access point, time of use and registered user of access device
- Listing of visitors, clientele, employees and subcontracted employees who would require special assistance during a fire emergency
- Other similar lists related to security

Richmond Hill Golf Club limits the amount and type of personal information it collects to that which is necessary for the business as permitted by law. Each affiliate of Richmond Golf Club will be responsible for its own collection, use and disclosure of information. Personal Information will be collected using procedures that are fair, transparent and lawful.

USE AND DISCLOSURE

Richmond Hill Golf Club shall not authorize the use of personal information for purposes other than those in keeping with the effective operation and management without the consent of the individual.

Richmond Hill Golf Club also uses a number of employees, third party service providers, consultants and other agents that may in the course of their duties have limited access to personal information retained. These include building concierge, security staff, housekeeping staff, consultants, temporary employees or employees of third-party suppliers, auditors, lawyers and others.

We restrict their access to any personal information we hold except to the extent necessary for them to reasonably perform their role on the individual's behalf. The purpose of disclosing personal information to these parties is to ensure an Individual's safety, security and reasonable enjoyment of the facility, to ensure Individual's have access to the premises and services that Richmond Hill Golf Club provides, to preserve the property and to collect monies owing for the provision of services.

Personal information will only be used or disclosed for the purpose for which it was collected unless an Individual has otherwise consented, or when it is required or permitted by law. In certain exceptional circumstances, Richmond Hill Golf Club may have a legal duty or right to disclose personal information without an Individual's knowledge or consent with respect to matters that concern the public's interest or in complying with a court order.

Richmond Hill Golf Club may disclose information without the individual's consent when permitted by law including in situations involving medical emergencies, collection of debt and suspicion of illegal activities.

Richmond Hill Golf Club shall allow an individual access to their information within a reasonable time upon receipt of a written request to view the information.

ACCURACY & SECURITY

Richmond Hill Golf Club will keep all personal information as accurately and as current as necessary to fulfill the identified purposes for which it was collected. Richmond Hill Golf Club will update or correct any personal information held by it if the individual concerned provides Richmond Hill Golf Club with particulars of any information which requires updating or correction.

In executing its responsibilities with respect to the confidentiality of personal information, Richmond Hill Golf Club will employ safeguards, appropriate to the sensitivity of the information, to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards will include physical measures, organizational measures and technological measures, for example locked filing cabinets, restricted access to offices, security clearances, limiting access on a "need to know" basis and the use of passwords and encryption. Procedures for implementing these measures will be communicated to all employees and third parties to ensure compliance with this principle.

Richmond Hill Golf Club acknowledges the responsibility of safely maintaining accurate records. All information kept in the on-site management office will be stored with limited access of management personnel. The data collected by the online registration system company, Jonas have their own database and are responsible in ensuring appropriate safeguards are in place to protect personal information.

ACCOUNTABILITY

A copy of this policy shall be kept available in the office of Richmond Hill Golf Club and will be made available for review upon request.

Individuals may address specific concerns regarding the use or distribution of personal information to their appropriate Department or Club Director.

Richmond Hill Golf Club will ensure that employees strictly comply with the Policy.

QUESTIONS OR CONCERNS

Richmond Hill Golf Club will receive, investigate and respond to any questions or concerns respecting this Privacy Policy or the personal information that is held. Individuals may contact the Privacy Officer with any questions or concerns or to request access to their personal information. Response to an individual's request will be made in a timely and efficient manner.

PRIVACY OFFICER

The Privacy Officer of Richmond Hill Golf Club is:
Doug Young, Club Director
8755 Bathurst St., Richmond Hill, ON L4C 0H4
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