

The Manor of Carmel Personal Information Protection Policy

At the Manor of Carmel, we are committed to providing our users with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our users, protecting their personal information is one of our highest priorities.

We will inform our users 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 PIPA, outlines the principles and practices we will follow in protecting our users' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our users' personal information and allowing our users to request access to, and correction of, their personal information.

Definitions

Personal Information – means information about an identifiable individual. 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 includes name, position name or title, business telephone number, business address, business email or

business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that the Manor of Carmel complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

1.1 : Unless the purposes for collecting personal information are obvious and the user 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 user information that is necessary to fulfill the following purposes:

To verify identity;

To identify user preferences;

To deliver requested products and services

To enroll the client in a program;

To send out association membership information;

To ensure a high standard of service to our users;

To meet regulatory requirements;

To contact the user (if requested) via the information provided

Policy 2 – Consent

2.1 : We will obtain user 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 directly or it can be implied where the purpose for collecting using or disclosing the personal information would

be considered obvious and the user voluntarily provides personal information for that purpose.

2.3 : Consent may also be implied where a user 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 services or products, fundraising and the user does not opt-out.

2.4 : Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), users can withhold or withdraw their consent for the Manor of Carmel to use their personal information in certain ways. A users decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the user in making the decision.

Policy 3 – Using and Disclosing Personal Information

3.1 : We will only use or disclose user 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 contact our users directly about products and services that may be of interest;

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

Policy 4 – Retaining Personal Information

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

4.2 : Subject to policy 4.1, we will retain user 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 user personal information is accurate and complete where it may be used to make a decision about the user or disclosed to another organization.

5.2 : Users 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.

Policy 6 – Securing Personal Information

6.1 : We are committed to ensuring the security of user 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 user personal information is appropriately protected:

Secure transmission of data;

Appropriate encryption of stored data;

6.3 : We will use appropriate security measures when destroying user's personal information such as shredding printed documents or securely erasing digital 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 Users Access to Personal Information

7.1 : Users have a right to access their personal information, subject to limited exceptions.

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 users 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 user of the cost and request further direction from the user on whether or not we should proceed with the request.

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