

Privacy Policy

Wooden Sticks will comply with the *Personal Information Protection and Electronic Documents Act* (PIPEDA), a federally enacted act to protect personal information that is collected, used or disclosed. For the purposes of this Policy, personal information means information about an identifiable individual, exceeding what is normally on a business card or in a telephone book, i.e., name, title, business address or telephone number. Any reference to a guest within this Policy is in reference to personal information and not business information.

Wooden Sticks has implemented policies and procedures to give effect to the fundamental principles of PIPEDA by:

1. Implementing procedures to protect personal information.
2. Establishing procedures to receive and respond to complaints and inquiries in connection with the collection, use and disclosure of personal information by Wooden Sticks.
3. Training staff and communicating information to staff about Wooden Sticks policies and procedures.

The principles guiding Wooden Sticks are explained in more detail below:

1. ACCOUNTABILITY

Wooden Sticks is responsible for the personal information under its control and has designated a Privacy Officer to be accountable for Wooden Sticks compliance with PIPEDA.

2. IDENTIFYING PURPOSE

Wooden Sticks will identify and document the purposes for which it collects personal information. Only personal information that is necessary for those identified purposes will be collected. If Wooden Sticks intends to use the personal information that has been collected for a new purpose, this new purpose will be identified and consent for such new purpose will be obtained from the guest to which the personal information relates prior to using such personal information. Wooden Sticks shall only collect, use and disclose personal information about Guests for the following purposes:

- a. To facilitate return visits and, wherever possible, to meet Guests' personal preferences;
- b. To communicate the offering of goods and services to Guests.
- c. To assist Wooden Sticks in the communication with Guests for reservation information with respect to its' services and for the promotion of its services to

the Guest.

Wooden Sticks does not sell or trade personal information about Guests to any third party agencies.

Guest inquiries regarding the purposes for the collection, use and disclosure of personal information will be addressed by Wooden Sticks or referred to the Chief Privacy Officer.

3. CONSENT

The knowledge and consent of Guests is required for the collection, use or disclosure of personal information, except when inappropriate, including where permitted or required by law. Wooden Sticks will seek consent for the collection of personal information at the time of collection, wherever possible. Wooden Sticks will make a reasonable effort to ensure that Guests are advised of the purposes for which the personal information being collected will be used, and will state the purposes in a manner that will allow Guests to reasonably understand how their personal information will be used or disclosed by Wooden Sticks

Although information may be publicly available, Wooden Sticks will treat this in accordance with PIPEDA principles. Moreover, Wooden Sticks may provide personal information to its lawyers, advisors, agents and/or third parties to collect a debt, comply with a subpoena, warrant or other court order, to a government institution requesting the information upon lawful authority, or as may be otherwise required by law. In all cases, proper internal authorization for disclosure procedures will be followed.

The use of Wooden Sticks will be considered consent to collect, use and disclose personal information for stated purposes.

Copies of the Wooden Sticks Privacy Policy will be published on the Wooden Sticks website at www.Woodensticks.com

A Guest may withdraw consent by providing reasonable notice to Wooden Sticks Privacy Officer. Wooden Sticks will inform the Guest of any implications of such withdrawal. Any withdrawal of consent will still allow Wooden Sticks to use and disclose a Guest's personal information in order to collect or enforce payment of amounts owing as a result of a Guest's previous or continuing use of Wooden Sticks. Subsequent use of the Wooden Sticks will automatically provide consent for the collection, use, disclosure and retention of personal information.

4. LIMITING COLLECTION

The collection of personal information will be limited to that which is appropriate in the circumstances.

Wooden Sticks collects some information about prospective Guests using technology, so

it may not be readily apparent to prospective Guests that it is being collected. For instance, when a prospective Guest visits our website, the system will gather information such as what kind of browser a visitor is on, what operating system they are using, their IP address, and their clickstream information (for example, which pages they have viewed and how long they have been there). An IP address is often associated with the place from which a prospective Guest enters the Internet like their Internet Service Provider (ISP), their firm or company or their university. This information is not personally identifiable.

Note that information is only gathered while the visitor is on the website in question -- in this case www.woodensticks.com. Wooden Sticks monitors how a visitor arrives at the website, but cannot and will not gather information about other sites the visitor has been on.

Wooden Sticks may use “cookie” technology in order to obtain non-personal information from its online visitors for certain purposes. The cookie is stored on their computer to allow them to get back into certain areas of the website with as minimal delay as possible. We do not extract personal information in this process nor do we disclose this information. Cookies are tools that allow the Wooden Sticks server to recognize a return visitor as a unique user. Cookies are small text files placed in the 'Cookies' folder on a visitor's hard disk and allow for Wooden Sticks to remember the visitor. The cookies placed by the Wooden Sticks server are readable only by Wooden Sticks, and cookies cannot access, read or modify any other data on a computer. All web-browsers offer the option to refuse any cookie, and if a visitor refuses the Wooden Sticks cookie then Wooden Sticks does not gather any information on that visitor.

5. LIMITED USE, DISCLOSURE & RETENTION

Wooden Sticks will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the Guest or as required by law. Personal information cannot be used or passed on in a manner inconsistent with the identified purpose.

Wooden Sticks may disclose a Guest's personal information to third parties retained by Wooden Sticks for the purposes of billing such a Guest for the use of Wooden Sticks and to collect and enforce payment of amounts owing by such Guests.

Certain Wooden Sticks employees and third party agents may be given access to a Guest's personal information collected by Wooden Sticks in so far as their duties require access for the purposes outlined above. Wooden Sticks employees and such third party agents are governed by a non-disclosure agreement prohibiting disclosure or use of any confidential or personal information for any purposes other than the stated purposes.

Personal information that has been used to make a decision about a Guest will be retained

in accordance with the Wooden Sticks document retention guidelines. Personal information that is no longer required will be destroyed, erased or made anonymous. Wooden Sticks retains personal information of a Guest only for as long as it is required for Wooden Sticks business purposes or as required by federal and provincial laws.

6. ACCURACY

Wooden Sticks will take reasonable steps to ensure that the personal information under its control is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

Wooden Sticks will not routinely update personal information, unless such a process is necessary to fulfill the purposes for which the information was collected. Wooden Sticks will take reasonable steps to ensure that personal information that is used on an ongoing basis, including personal information that is disclosed to third parties, is accurate and up-to-date.

Access to a Guest's personal information on record with Wooden Sticks may be requested by that Guest in order to review and amend their personal information, as appropriate. In circumstances where personal information has been provided by a third party, Wooden Sticks will refer the Guest to that party. It is the responsibility of the third party to maintain accuracy of the personal information that is provided by them. To access your personal information, refer to "Contact us".

7. SAFEGUARDS

Wooden Sticks will take reasonable steps to protect personal information through security safeguards appropriate to the sensitivity of the personal information. Team Members of Wooden Sticks who have access to personal information will be made aware of the importance of maintaining the confidentiality of personal information. As a condition of employment all new employees/agents must sign the Wooden Sticks Confidentiality Agreement. Security safeguards protect against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Care will be used in the disposal or destruction of personal information, to prevent unauthorized parties from gaining access to the information.

8. OPENESS

Wooden Sticks will make readily available to Guests specific information about its policy and guidelines relating to the management of personal information. Wooden Sticks will be open about its policy and procedure with respect to the management of personal information, and Guests will be able to acquire information about these policies easily and in a form that is generally understandable. This policy and any related information is available at all times at, www.woodensticks.com, under Privacy. To contact Wooden Sticks, refer to "Contact us".

9.INDIVIDUAL ACCESS

Wooden Sticks will inform a Guest of the existence, use and disclosure of their personal information (including to third parties) and will provide access to that personal information, upon written request. Wooden Sticks will assist a Guest in the preparation of a request for access when such a Guest requests assistance. Wooden Sticks will inform the Guest whether or not it holds personal information about them, and will indicate the source of any such personal information, when possible.

Wooden Sticks will be as specific as possible in providing an account of third parties to which personal information has been disclosed, and will provide a list of organizations to which personal information may have been disclosed when it is not possible to provide a list of the organizations to which specific personal information have actually been disclosed.

Wooden Sticks will respond to a Guest's request to access their personal information within a reasonable time, and not later than 30 days after receipt of the request. Wooden Sticks may be entitled to a 30 day extension to respond, in limited circumstances, in which case the Guest will be notified of such an extension, the new time limit, the reasons for extending the time limit, and their right to make a complaint to the Privacy Commissioner with respect to the extension.

10. CHALLENGING COMPLIANCE

A Guest will be able to address a challenge concerning compliance with the above principles to the Chief Privacy Officer. Wooden Sticks will handle all complaints or inquiries about the policies and procedures relating to the handling of personal information in line with the processes that are in place.

Wooden Sticks will inform Guests who make inquiries or lodge complaints of the existence of the relevant complaint procedures. Wooden Sticks will investigate all complaints, and if a complaint is justified, Wooden Sticks will take appropriate measures, including amending policies and procedures.

HOW TO CONTACT US:

If you have any questions or comments about this Privacy Policy or you feel that your concerns or complaints have not been resolved to your satisfaction, please contact us by:

- Telephone at 905-852-4379
- Facsimile at 905- 852-4315
- Email at privacy@woodensticks.com
- Writing to the Chief Privacy Officer,
Wooden Sticks Golf Inc.
P.O. Box 848

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