

# THE TRAVEL NETWORK CORP.

## General Privacy Policy For Customers and Suppliers

### INTRODUCTION

The Travel Network (“TTN”) has been a highly successful and growing enterprise since our inception in 1985 by our President, Ruby Silvertown. TTN is now proudly one of the largest independently owned travel agencies in Canada. TTN’s affiliation with Virtuoso represents decades of professional experience and worldwide connections, in addition to a well-developed product, lifestyle and destination expertise of our team of highly knowledgeable travel specialists, and our intelligent use of leading-edge technology. We believe that if we keep both our suppliers and our customers happy then we will achieve success.

To that end, the privacy of Personal Information has always been an important part of our operations. On January 1, 2004, the federal *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) came into effect for provincially regulated organizations that collect, use and disclose Personal Information in the course of their commercial activities.

TTN has developed the following General Privacy Policy (the “Privacy Policy”) in respect of our collection, use and disclosure of Personal Information in the course of our commercial activities, as well as to inform individuals of our continuing commitment to the protection of their Personal Information.

### DEFINITIONS IN THIS POLICY

**Collection** means the act of gathering, acquiring, recording or obtaining Personal Information from any source, including third parties, by any means.

**Commercial activity** means any particular transaction, act or conduct or any regular course of conduct that is of a commercial character, including the selling, bartering or leasing of donor, membership or other fundraising lists.

**Consent** means the voluntary agreement with the collection, use and disclosure of Personal Information for defined purposes. Consent can be either express or implied. Express consent is given explicitly, orally, electronically or in writing and will be requested when the information is sensitive. Implied consent is consent that can reasonably be inferred from an individual’s action or inaction and will be accepted when the Personal Information is less sensitive. Generally, and with certain exceptions, an individual’s knowledge and consent is required for the collection, use, or disclosure of Personal Information.

**Disclosure** means making Personal Information available to third parties outside the organization.

**Individual** means a natural person and includes a customer, contractor and supplier but does not include an employee of TTN.

**Personal Information** means any information about an identifiable individual. This includes: name, age, income, credit history, banking information, home address, credit card numbers, billing records, recorded complaints and personal email addresses.

**Use** means the treatment, handling, and management of Personal Information within an organization.

## **THE TEN PRINCIPLES ADOPTED BY TTN**

### **1. Accountability**

TTN is responsible for Personal Information in its possession or control and has designated a person who is accountable for TTN's compliance.

Responsibility for compliance with TTN's Privacy Policy rests with the Chief Privacy Officer. The Chief Privacy Officer may be contacted at Chief Privacy Officer c/o The Travel Network Corp., 1920 Avenue Road, Toronto, Ontario, M5M 4A1. Other employees within TTN may act on behalf of the Chief Privacy Officer regarding the day-to-day collection and processing of Personal Information.

TTN will have policies and procedures in place to enforce its Privacy Policy, including the following:

- (a) Procedures to protect Personal Information and to oversee the company's compliance with the policy;
- (b) Establishing procedures to receive and respond to inquiries or complaints;
- (c) Training and communication to employees about TTN's policies and practices;
- (d) Public information to explain TTN's policies and practices.

### **2. Identifying purposes for Collection of Personal Information**

Our corporate mission is the continuous improvement of satisfying our customer's needs. To that end, you will find below some of the ways we collect Personal Information about our customers, suppliers and other individuals in the course of our commercial activities. TTN will identify the purposes for which Personal Information is collected at or before the time the information is collected.

TTN has collected and collects Personal Information in person, by phone, facsimile, email, Internet, and by other means for the following purposes:

- (a) to establish and maintain responsible commercial relations with individuals and to provide ongoing service including booking travel arrangements, processing orders, responding to customer comments or complaints, and operating TTN's website;

- (b) to understand and respond to customer needs and preferences;
- (c) to verify customer identity;
- (d) to develop, enhance, market or provide products and services, including through the website;
- (e) to distribute subscriptions of Virtuoso publications to applicable clients and to send relevant offers and information on behalf of qualified Virtuoso partners;
- (f) to manage and develop its business and operations, including obtaining credit references; and
- (g) to meet legal or regulatory requirements.

### **3. Obtaining Consent for the Collection, Use or Disclosure of Personal Information**

The knowledge and consent of an individual are required for the collection, use and disclosure of Personal Information, except as provided by PIPEDA. TTN will obtain consent from individuals before or when it collects or uses the Personal Information. However, TTN may seek consent to use and disclose Personal Information after it has been collected but before it is used or disclosed for a new purpose. TTN will make a reasonable effort to ensure individuals understand how it will use their Personal Information. TTN will not attempt to deceive anyone into giving consent.

A person can withdraw consent at any time, except as provided by PIPEDA. A customer's receipt of this Privacy Policy shall constitute consent, use or disclosure of Personal Information, except where inappropriate and unless the customer advises TTN in writing that they wish to withdraw consent. Regarding more sensitive information, TTN may seek express consent (whether verbal, in writing, or by electronic means).

### **4. Refusing or withdrawing consent**

Individuals may refuse or withdraw consent to TTN's collection, use or disclosure of their Personal Information unless PIPEDA requires otherwise. If you wish to withdraw consent at any time, we would ask that you provide us with reasonable notice

If an individual refuses or withdraws his or her consent, TTN may not be able to provide the individual with some products and services.

### **5. Limiting Collection of Personal Information**

TTN shall limit the collection of Personal Information to that which is necessary for the purposes identified by the company. TTN will only collect information by fair and lawful means. The type of information TTN collects may include but is not limited to: a customer's name, address, phone number, package ordered, credit and banking information. This Personal Information may be collected from various sources, including the individuals themselves such as by phone, website, email, facsimile and other means, credit bureaus, personal references and other third parties who represent that they have the legal authority to disclose the information.

## The TTN Website

The TTN web server anonymously logs requests from individual web browsers. This logging happens whether or not individuals have Cookies enabled and is not related to any Personal Information. The information logged primarily consists of:

- a) Internet IP address
- b) Files that the individual's browser has requested
- c) The time of the request
- d) Browser type and computer type
- e) Page from which the individual came

TTN uses the above information to understand the number of visitors to its website, the type of information requested, and what problems, if any, may exist on the website. This information is used in aggregate and is not linked to any personally identifiable information. TTN may share this non-identifiable information in a distilled or raw format with business partners and associates.

When someone visits a website, a cookie is placed on the individual's machine (if the individual accepts cookies) or is read if the individual has visited the site previously. The web server does this as a matter of course and the information is not required to use the TTN website. An individual may turn cookies off in his or her browser and still use all the functionality of the TTN website.

As stated above, we may collect information about you when you send us an email. For example, you may send us a comment or suggestion about how we may improve our site, or you may have a question about a particular product. We collect your contact information and use it to answer the subject of your query or send you promotional information about products or services that may be of interest to you. TTN will remove any information voluntarily provided within 48 hours of receiving a written request.

An individual may restrict TTN's email communication at any time, either by replying to an individual email with the words "Please remove me from your email list" or by sending an email to the email address below requesting that TTN does not send information.

## 5. Limiting use, disclosure and retention of Personal Information

TTN uses and discloses Personal Information only to the extent required to fulfill the purposes stated within this policy, except with the consent of the individual or as provided by PIPEDA. If we require Personal Information for any other purpose, we will make every attempt to notify the appropriate individuals of the new purpose and request consent. We will keep Personal Information as long as necessary to fulfill the above noted purposes. For example, certain business records are kept for up to 10 years to satisfy income tax legislation requirements and internal requirements.

When TTN destroys Personal Information, it will use appropriate safeguards to prevent unauthorized collection, use or disclosure.

## **6. Accuracy**

TTN will employ reasonable measures to ensure that the Personal Information we have about individuals is accurate, complete and as up-to-date as necessary for the identified purpose(s). We will amend Personal Information that is inaccurate or incomplete.

## **7. Appropriate safeguards**

We have in place appropriate security measures to protect against the unauthorized collection, loss, misuse or alteration of information we retain on file appropriate to the sensitivity of the information, including the following:

- a) Wherever possible, files containing individual Personal Information are separated from corporate clients and kept in locked cabinets;
- b) Invoices, credit memos and cheques containing Personal Information are put in sealed confidential envelopes.
- c) Only authorized personnel on a “need-to-know” basis have access to individual Personal Information.
- d) Electronic data is protected by passwords and encryption and is only accessible to authorized personnel.
- e) Master user lists and rights are reviewed annually.

We will continue to enhance security procedures to safeguard and protect Personal Information. However, please remember that no security measures are entirely foolproof, especially in respect of Internet or email communications and we encourage visitors to our website to exercise care with the information that they provide through the Internet or by email.

## **8. Openness concerning policies and practices**

TTN will make readily available specific information about our policies and practices relating to the management of Personal Information and will review its privacy policies on a regular basis. A copy of this privacy policy (and any future updates) can be obtained from our Web site at [www.thetravelnetwork.com](http://www.thetravelnetwork.com)

## **9. Access to Personal Information**

TTN will inform an individual of the existence, use and disclosure of his or her Personal Information upon request and give the individual access to that information. An individual may be able to challenge the accuracy and completeness of that information and have it amended as appropriate. Individuals who have any questions about this privacy policy or the collection, use or disclosure of their Personal Information may contact TTN at the address noted below. Please

note that Individuals may be asked to confirm their identity and be directed to send us requests in writing.

## **10. Challenging Compliance**

Upon receipt of a complaint or enquiry from an individual concerning the collection, use or disclosure of their Personal Information, TTN will respond in a timely manner and will review all such complaints or inquiries free of charge. If the complaint is valid, TTN will take appropriate measures to resolve the complaint, including, if necessary, amending its policies and procedures.

### **How To Contact Us**

For more information, to file a complaint or to make enquiries about your Personal Information, please contact TTN's Privacy Officer at the following contact information:

Address:	1920 Avenue Road Toronto, ON M5M 4A1
Telephone No:	416-636-2840
E-mail address:	<a href="mailto:privacy@thetravelnetwork.com">privacy@thetravelnetwork.com</a>
Internet	<a href="http://www.thetravelnetwork.com">www.thetravelnetwork.com</a>