



The St. John's Board of Trade Privacy Policy

Introduction

Protecting your privacy and the confidentiality of your information -- over the Internet, on the telephone, or through our offices - has always been fundamental to the way we do business at the St. John's Board of Trade. We operate on the basis of a Privacy Policy and related procedures that guide the handling of the personal information we collect. We have created this privacy statement in order to demonstrate our firm commitment to protecting the privacy of our members, partners and potential website visitors. This policy and related procedures are consistent with the Canadian Standards Association Model Code for the Protection of Personal Information (herein "CSA Model Code") and applicable privacy legislation.

Privacy Statement

This policy deals only with personal information handled by the St. John's Board of Trade. Personal information is information about an identifiable individual, excluding business contact information. The following explains how the St. John's Board of Trade handles personal information. The St. John's Board of Trade reserves the right to change this policy and it may be updated periodically. These changes may affect our use of your personal information. Accordingly, please check for changes regularly.

Accountability

The St. John's Board of Trade (herein "the Board") is accountable for all personal information under its control. The Board's privacy officer is Jennifer Chaytor, Manager of Finance and Compliance, who is designated as responsible for the Board's privacy policy. The privacy officer can be reached by:

- Email: jchaytor@bot.nf.ca
- Telephone: (709) 726-2961
- Fax: (709) 726-2003
- Mail: P.O. Box 5127, St. John's, NL A1C 5V5

Any questions about the Board's handling of personal information should be directed to the privacy officer. Please see below for more information about the process for referring questions about the Board's handling of personal information.

Purpose of Personal Information

The purpose for which the St. John's Board of Trade collects personal information will be identified at or before the time the information is collected. The Board may collect personal information for the purposes of:

- ▶ administering Board membership and providing member services;
- ▶ registering for Board events, for example the Annual General Meeting;
- ▶ registering for initiatives such as trade missions;
- ▶ website;
- ▶ purchasing various Board products or services including document certification, Business News, website and/or electronic advertising, social media
- ▶ processing and administering the above or other purposes as necessary.

The Board will not use personal information for any other purpose than identified at or before the time of collection.

Consent

The Board seeks consent for all personal information we collect, use and disclose through information provided to individuals prior to collection, or at the time of collection.

If you have voluntarily provided information, you have consented to the collection, use and disclosure of your personally identifiable information as described in this privacy policy. As required by the CSA Model Code, the Board will not use personal information for any purpose other than that for which you consented. Should the Board require personal information for a new purpose, we will contact you to seek consent for that new use.

Limits for Collecting, Using, Disclosing and Keeping Personal Information

The Board does not collect, use or disclose personal information of individuals except when individuals give consent and provide the information on a voluntary basis. There may be occasions where more specific personal information is necessary for us to proceed with a request for information, or provide you with a product or service. In such cases, we will provide you with a description on the information we need. In all cases, the Board limits the amount and type of information collected to only the personal information that is required to provide the individual with the requested information, product, or service. We collect only information that is voluntarily provided by you and undertake that such information will be kept strictly confidential.

We retain personal information only as long as is necessary to provide the individual with the requested product, service or information and delete or destroy this information after that time. (i.e. if personal information is given to enable you to register for an event, the personal information will only be used for this event). In some cases, however, legal reporting and retention requirements necessitate that the Board retain information for a specific amount of time. In general, the Board retains information for a period not longer than two (2) years.

The Board does not sell or trade any personal information with third parties. The Board may transfer information to service providers where information processing is outsourced by the Board, in the course of its administrative procedures, or member services in specific cases. Where personal information is transferred to a service provider for processing, we require the service provider to respect this Privacy Policy and we restrict them from using or disclosing personal information transferred to them for any purpose other than the provision of services to us.

Any personal information that the Board retains is kept in such a manner as to ensure its security and confidentiality at all times.

Safeguarding Personal Information

The Board respects the privacy of our members, partners, potential website visitors and internet users and will protect that privacy as vigorously as possible. We store personal information in electronic and physical files that are secure. Our security measures include secure locks on filing cabinets, and using industry standard techniques such as firewalls, encryption, intrusion detection and restricted access to records and to equipment, including computers. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or receive from us electronically. This is especially true for information you transmit to us via e-mail. We have no way of protecting that information until it reaches us. Once we receive your transmission, we make our best efforts to ensure its security on our servers.

Accuracy of and Access to Personal Information Collected

The Board makes every effort to keep personal information as accurate, complete, current and relevant as necessary for the identified purposes. The Board does not routinely update personal information.

The Board makes readily available to individuals our Privacy Policy and related procedures for managing personal information. We provide access to the Privacy Policy and related procedures on the Board's Web site and in written form. Any questions about the handling of personal information by the Board can be raised with our privacy officer.

At the written request of an individual, he or she may view or edit their personal information as collected by the Board. The Board will inform them of what personal information we have about the individual, what it is being used for and, in cases where it has been disclosed, to whom it has been disclosed. There may be exceptional circumstances as provided by the CSA Model Code under which the Board may not be able to give an individual access to the personal information about her or him held by the Board. In this case the Board will explain the reason for this lack of access, as provided by the CSA Model Code.

To make a request, please call, send a letter, email or fax addressed to our Privacy Officer at the contact indicated above. In your request, please include the following information: Name, contact details, membership name, the nature of your request, including whether you wish to view and/or edit information or inquire regarding use and/or disclosure.

The Board will reply to your request in no later than 30 days after receipt of the request, or if we are not able to respond within this time period, we will send you a notice of extension. If we are not able to disclose all the personal information we hold on you, we will give you a reason for our inability to do so, unless prohibited by law.

Questions

Any questions or comments about the Board's handling of personal information should be directed to our privacy officer.