

Privacy Policy of Harbour Side Family Trailer Park

Privacy of personal information is an important principle to Harbour Side Family Trailer Park. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the premises and services we provide. We also try to be open and transparent as to how we handle personal information. This document describes our privacy policies

Harbour Side Family Trailer Park, licenses the use of short term seasonal camping sites (May to October) on our property *on a yearly basis*. To provide this service, we hire employees and use a number of consultants and agencies that may, in the course of their duties, have access to personal information we hold. These include, but are not limited to, property managers, security, cleaning and maintenance organizations, accountants, lawyers, computer consultants, cleaners, and temporary workers. We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

We Collect Personal Information: Primary Purposes

We collect, use and disclose personal information in order to serve the people we license camping sites to and to manage the properties in our portfolio. For the people we license camping sites to, the primary purpose for collecting personal information is to ensure their safety, security and reasonable enjoyment and that of other persons, to ensure they have access to the premises, equipment and services that we have agreed to provide, to preserve property and to collect fees. We disclose limited personal information to third party suppliers of services so that they may make available their services to new and existing occupants. We may also disclose personal information to insurers, lenders or prospective purchasers of properties we own or manage. A complete list of persons or business entities to whom your personal information may be provided and who may, in turn, send Commercial Electronic Messages (CEMs) to you is attached as a schedule to this privacy policy under the heading: "Third Party Disclosure". At this time, we have taken steps to generally prohibit third parties from using your personal information for the purpose of sending you (CEMs) unless same are exempt from restrictions of, and are otherwise sent in full compliance with, Canada's Anti-Spam Legislation (CASL). Third Parties who may send CEMs are listed in the disclosure schedule appended to this privacy policy.

Examples of the type of information we collect for these purposes includes the following:

- Names of all occupants of the camping site
- Business, personal and emergency contact information
- Use and intended uses of the property
- Compliance with the Occupancy agreement and our rules and regulations

- Payment, banking and other financial information
- Any special needs of persons receiving accommodations (e.g., disability or health) and
- Copy of your insurance policy (proof of extended liability insurance) and / or copy of your driver's license for the purpose to proof that the address of Harbour Side Trailer Park is not being used as your permanent address, and
- The amount of fees payable with respect to each license to use

It would be rare for us to collect any personal information without a person's express consent, but this might occur in a case of urgency (e.g., the person is unavailable), where we believe the person would consent if asked and it is impractical to obtain consent (e.g., information provided by a relative about an absent occupant), appropriate public sources (e.g., government, court or tribunal records) or to investigate a breach of the Occupancy agreement or contravention of the law.

We collect your full legal name and date of birth to ensure the accuracy of those records. The information described above and the information set out below about prospective occupants can be collected or updated if the occupant is in arrears of fees or wishes to renew their license to use.

About Prospective Occupants

Prospective occupants are requested to complete an application form so that we can assess their suitability as occupants and have necessary basic information should they stay at our properties. This would include, but not be limited to the following types of information:

- Full legal name, date of birth and present / current address
- Business and personal telephone, email, and other contact information
- Automobile information and
- Intended use of the premises

By completing an application form and the Consent to Disclosure form you agree to us collecting this information about your suitability to be an occupant. Your information is subject to transfer to Third Parties in the same manner as that set out above in relation to Occupants.

About Members of the General Public

For members of the general public, our primary purpose for collecting personal information is to promote the safety of occupants and the security of property. For example we may operate security cameras and monitor the presence, vehicles and the conduct of visitors and non-occupants on our property. We believe that the collection of this information is implied by the private and recreational nature of our property.

Secondly, we might gather personal information in the course of marketing our property to prospective occupants. This information is collected either from appropriate public sources (e.g., telephone directories) or directly from the individuals with their consent.

On our website, we only collect, with the exception of cookies (electronic markers identifying computers that have previously visited our website), the personal information you provide and only use that information for the purpose you gave it to us (e.g., to respond to your email message, to provide information about our services). Cookies are only used to help you navigate our website and are not used to monitor you.

Suppliers and Contractors

We often deal with suppliers and contractors who provide goods and services to the properties we own and operate. We monitor their performance, including their promptness, reliability, quality and value of services. Most of this information is business information and would not be covered by privacy legislation. However, occasionally, this information relates to the conduct of an individual (e.g., skill of a particular employee of a supplier or contractor, inappropriate behaviour or comments by a particular representative). We reserve the right to collect this information, use it in deciding upon future services and to disclose it to others involved in related or similar operations. We may also collect home contact information to reach them in case of emergencies.

About Contract Staff

For people who are contracted to do work for us (e.g., temporary workers), our primary purpose for collecting personal information is to ensure we can contact them in the future (e.g., for new assignments) and for necessary work-related communication (e.g., sending out paycheques, year-end tax receipts, tax filings). Examples of the type of personal information we collect for those purposes include home addresses and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of an emergency (e.g., an outbreak of a contagious disease) or to investigate a possible breach of law (e.g., if a theft were to occur).

We may transfer your personal information to third parties and servers located within and outside of Canada for the purposes of storage and use with respect to their accounting and maintenance systems, and for the processing of payroll and on-line applications. While this information is outside of the country, it is subject to the laws of the country in which it is held. As such, it may be accessible to law enforcement and national security authorities of that jurisdiction.

We Collect Personal Information: Related and Secondary Purposes

Like most property owners, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

- ❑ To collect fees.
- ❑ To collect fees and accounts from our clients.
- ❑ We review occupant, client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our consultants, suppliers and staff. In addition, external consultants (e.g., auditors, lawyers, business consultants) may on our behalf do audits and continuing quality improvement reviews of our operations, including reviewing occupant or client files and interviewing our staff.
- ❑ Various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. Also, we believe that we should report information suggesting serious illegal behaviour to the authorities. These reports could include personal information about an occupant or other individual to support the concern (e.g., illegal drug activity), although we try to keep this disclosure to a minimum. In these circumstances, we may consult with professionals (e.g., lawyers, a private security service) who will investigate the matter and report back to us.
- ❑ If an occupant's fees are paid for by a third party (e.g., employer, your trustee, the government) we may be asked to provide them with certain information. These third party payers often have occupant consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate occupant entitlement to and responsible use of this funding.
- ❑ Occupants, clients or other individuals we deal with may have questions about the services they received. We also provide ongoing services for many occupants and clients over a period of months or years for which previous records are helpful. We retain occupant and client information for a minimum of two years after the last contact to enable us to respond to those questions and provide these services.

You can choose not to be part of some of these related or secondary purposes (e.g., by not having a third party pay your fees). We do not, however, have much choice about some of these related or secondary purposes (e.g., external regulation).

Protecting Personal Information

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- ❑ Paper information is either under supervision or secured in a locked or restricted area.
- ❑ Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers. All of our cell phones are digital, which signals are more difficult to intercept (however, we still are careful on cell phones because sometimes they switch over to an analog service).
- ❑ Paper information is transmitted through sealed, addressed envelopes or boxes by our employees or reputable companies.
- ❑ Electronic information is transmitted either through a direct line or is anonymized or encrypted.
- ❑ Our staff is trained to collect, use and disclose personal information only as necessary to fulfill assigned duties and in accordance with our privacy policy.
- ❑ External consultants and agencies with access to personal information must provide us with appropriate privacy assurances.

Retention and Destruction of Personal Information

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

We destroy paper files containing personal information by shredding. We remove electronic information when we can if it does not appear that we will be contacting you again. When the hardware is discarded, we ensure that the hard drive is physically destroyed or completely reformatted.

You Can Look at Your Information

With some exceptions, you have the right to see what personal information we hold about you. We ask that, if you choose to exercise this right, you put your request in writing. We reserve the right to charge a nominal fee for such requests. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with this access.

If there is a problem, we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

If we collected personal information on behalf of a client we may have conveyed that information directly to the client. If so, we may not have it as a part of our own files and you will have to go to the client to look at the information.

If you believe there is a mistake in the information, you have the right to ask for it to be corrected. We may ask you to provide documentation that our files are wrong. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

Use of Video Surveillance and Recordings

Video equipment may be installed and operating in public areas of the property on which your camping site is located. The video equipment may have special capabilities that will allow it to capture sound recordings along with images. Other special capabilities that the video equipment may possess includes, but is not limited to, zoom, facial recognition, or night-vision features.

The video equipment may be operating at all times. Surveillance of the video recordings may occur at any time.

The purpose of the use of such equipment is for your safety, security and reasonable enjoyment and that of the other occupants, to ensure you have access to the premises, equipment and services that we or our clients have agreed to provide, to preserve our property, and to deter crime.

Where required by law, signs will be posted informing you that video equipment is operating and recording personal information about you. Also posted on those signs will be the contact information for our Information Officer whom you can contact if you have questions regarding the video recordings or if you wish to have access to recorded images of you.

What is Captured by the Video Recordings

Your image, movements, actions, or other identifiable information about you, may be captured by the video equipment. Where video equipment captures audio recordings, any sounds or communications you make may be recorded.

Retention and Destruction of Personal Information Recorded by Video Equipment

The recordings captured by the video equipment along with the video equipment will be stored in a secured location. Access to the location and recordings is limited. Hardware is either under supervision or secured in a locked or restricted area. Recordings will be kept for a minimum of 5 days before being destroyed.

Use of Audio Equipment and Recordings

There are circumstances under which the Owner/employer may make audio recordings of its employees, contractors, or occupants. There are several purposes for making the recordings; they include: situations where there are work-related performance issues, to ensure the safety of the workplace, to ensure productivity, and to prevent harassment.

Recordings may be made during meetings, interviews, or telephone calls between the employer and an employee. Audio equipment may be operating at other times. Information recorded by the audio equipment may capture communications of any of the following persons: the employer, employee, occupants, contractors, and the general public.

Retention and Destruction of Personal Information Recorded by Audio Equipment

Audio recordings will be kept for a minimum of 24 hours before being destroyed. The recordings may be kept for a longer period if there are on-going issues related to the employment relationship, if required by law, or if litigation is contemplated. The audio recordings will be stored in a secured location. Access to the location and recordings is limited. Hardware is either under supervision or secured in a locked or restricted area.

Retention and Destruction of Personal Information Recorded by Voicemail

Voicemail messages left for us will be erased after they have been listened to by an employee. If a message contains personal information of an individual which we will rely upon when making a decision, that voicemail will be kept for a period of no more than 24 hours. After that period has expired, the voicemail message will be erased, and thus will not be available for review.

Disclosure of Personal Information Recorded by Video or Audio Equipment

We may disclose your personal information without your knowledge or consent under certain circumstances. Those circumstances include: if the disclosure is required by law, provided to our lawyers, for the purpose of collecting a debt you owe to us, in compliance with a subpoena, warrant, or issued order made by a court, person or body with jurisdiction to compel the production of information, or to comply with rules of court relating to the production of records.

Disclosure may also be made to a government institution that has made a request for the information, identified its lawful authority to obtain the information and indicated that: it suspects that the information relates to national security, the defence of Canada or the conduct of international affairs, the disclosure is requested for the purpose of carrying out any investigation relating to the enforcement, gathering intelligence for the purpose of enforcing, or enforcing any law of any jurisdiction, or the disclosure is requested for the purpose of administering any law of Canada or a province. Disclosure may be made by an investigative body if the disclosure is reasonable for purposes

related to investigating a breach of an agreement or a contravention of the laws of Canada or a province.

Upon our initiative, we may disclose the information to an investigative body or a government institution if we have reasonable grounds to believe that the information relates to a breach of an agreement or a contravention of the laws of any jurisdiction that has been, is being or is about to be committed, or if we suspect that the information relates to national security, the defence of Canada or the conduct of international affairs.

If information regarding an identifiable individual is disclosed to a person who needs the information because of an emergency that threatens the life, health or security of an individual and, if the individual whom the information is about is alive, we will inform that individual in writing of the disclosure without delay.

Use Without Knowledge or Consent of Personal Information Recorded by Video or Audio Equipment

We may, without your knowledge or consent, use your personal information if: we become aware of information that we have reasonable grounds to believe could be useful in the investigation of a contravention of the laws of any jurisdiction that has been, is being, or is about to be committed, and the information is used for the purpose of investigating the contravention, it is used for the purpose of acting in respect of an emergency that threatens the life, health, or security of an individual, or has been collected under circumstances in which consent is not required.

Access to Your Personal Information

Upon request, an individual will be informed of the existence, use, and disclosure of his or her personal information and will be given access to that information. An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate. Such a request must be made in writing. If you require our assistance with preparing your request, you must inform us of your need for assistance.

We will respond to your request within thirty days of receiving the request. If there is a circumstance that prevents us from responding to your request within thirty days, we will provide you with a notice of extension.

In certain situations, we may not be able to provide access to all the personal information we hold about you. The reasons for denying access to this information will be provided to you upon request. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security, or commercial proprietary reasons, or information that is subject to solicitor-client or litigation privilege.

If you believe there has been an unauthorized disclosure of your personal information, you must put your complaint in writing and direct it to our Information Officer.

Employees, agents, or other contractors may have access to the personal information that has been recorded by the video and audio equipment. Disciplinary action will be taken in respect to any employee, agent, or contractor who fails to comply with this privacy policy.

Changes to this Privacy Policy

We reserve the right to change this Privacy Policy from time to time. If we make a material change, this Privacy Policy will be updated accordingly. We recommend that you periodically review this Privacy Policy, which is available in paper copy only, so that you are aware of any changes.

Do You Have a Question?

Our Information Officer can be reached at:
Betty Urbanski
7487 Riverside Dr. Port Franks, On. N0M 2L)

Our Information Officer will attempt to answer any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. He/she will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

This policy is made under the *Personal Information Protection and Electronic Documents Act*. It is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above.

For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

112 Kent Street
Ottawa, ON K1A 1H3
Phone: (613) 995-8210
Toll-free: 1-800-282-1376
Fax: (613) 947-6850 TTY: (613) 992-9190
www.privcom.gc.ca

Schedule "A": Third Party Disclosure List

We prohibit Third Parties from using personal information to send CEM's; consequently, none are disclosed at this time.

Or

Below is the list of Third Parties that we provide personal information to, consequently, you may receive CEMs from these suppliers.

1. We may contact a Collection Agency (Name & Contact Information not available at present time) if there are any funds owing to us.