

## *Personal Information Protection Policy*

At Wild Goose Winery, we are committed to providing our customers and members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our customers and members, protecting their personal information is one of our highest priorities.

While we have always respected our customers and member's privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's Personal Information Protection Act. BCPIPA sets out rules for the collection, use and disclosure of personal information in the course of commercial activity as defined in the Act.

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

This Personal Information Protection Policy applies to Wild Goose Winery and its subsidiaries, now or in the future. This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Wild Goose Winery.

### Definitions

**Personal Information** – means information about an identifiable individual i.e., including name, age, home address and phone number, and credit card information. 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 BCPIPA.

**Privacy Officer** – means the individual designated responsible for ensuring that Wild Goose Winery complies with this policy and BCPIPA.

### **Policy 1 – Collecting Personal Information**

1.1 Unless the purposes for collecting personal information are obvious and the customers and members 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 customer's and member's information that is necessary to fulfill the following purposes:

- To verify identity;
- To verify age requirement to purchase wine we may collect birthdates;
- To identify customer and member preferences;
- To open and manage a Vintner's Club membership account;
- To deliver requested products and services;
- To send out Vintner's Club membership information;
- To contact customers and members for promotional purposes;
- To ensure a high standard of service to our customers and members;
- To meet regulatory requirements;

## **Policy 2 – Consent**

2.1 We will obtain customer's and member's 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 orally or electronically or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the customer and member voluntarily provides personal information for that purpose.

2.3 Consent may also be implied where a customer and member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for e-mails, the marketing of new services or products and the customer and member 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), customers and members can withhold or withdraw their consent for Wild Goose Winery to use their personal information in certain ways. A customer's and member's 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 customer and member in making the decision.

2.5 We may collect, use or disclose personal information without the customer's and member's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law

## **Policy 3 – Using and Disclosing Personal Information**

3.1 We will only use or disclose customer's and member's personal information where necessary to fulfill the purposes identified at the time of:

- To fulfill their benefits as members of the Vintner's Club and/or email list subscribers;

- To conduct customer and member surveys in order to enhance the provision of our services;
- To contact our customers and members directly about products and services that may be of interest;

3.2 We will not use or disclose customer's and member's personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell customer and member lists or personal information to other parties.

#### **Policy 4 – Retaining Personal Information**

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

4.2 Subject to policy 4.1, we will retain customer's and member's 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 customer's and member's personal information is accurate and complete where it may be used to make a decision about the customer and member.

5.2 Customers and members 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.

5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required. If the correction is not made, we will note the customer's and member's correction request in the file.

#### **Policy 6 – Securing Personal Information**

6.1 We are committed to ensuring the security of customer's and member's 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 customer's and member's personal information is appropriately protected:

- Data in electronic form is protected using SSL encryption, user IDs, passwords, and firewalls;
- Personal data will be restricted to only employees that require access;
- We contractually require all service providers to provide comparable security measures.

6.3 We will shred all paper copy data and delete all electronic data when destroying customer's and member's personal 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 Customer and Members Access to Personal Information**

7.1 Customers and members have a right to access their personal information, and are encouraged to keep their personal information current.

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 customers and members 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 customer and member of the cost and request further direction from the customer and member 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 customer or member in writing, providing the reasons for refusal and the recourse available to the customer or member.

#### **Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual**

8.1 The Privacy Officer is responsible for ensuring Wild Goose Winery's compliance with this policy and the Personal Information Protection Act.

8.2 Customers and members should direct any complaints, concerns or questions regarding Wild Goose Winery's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the customer or member may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Wild Goose Winery's Privacy Officer:

Estate Manager  
Wild Goose Vineyards & Winery  
2145 Sun Valley Way  
Okanagan Falls, BC  
V0H 1R2