

The Maritime Inns & Resorts PRIVACY CODE

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Introduction

At Maritime Inns & Resorts, respecting privacy is an important part of our commitment to our customers. That is why we have developed The Maritime Inns & Resorts Privacy Code. The Maritime Inns & Resorts Privacy Code is a statement of principles and guidelines regarding the minimum requirements for the protection of personal information provided by Maritime Inns & Resorts to its customers. The objective of The Maritime Inns & Resorts Privacy Code is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the *Personal Information Protection and Electronic Documents Act* (Canada).

Maritime Inns & Resorts will continue to review The Maritime Inns & Resorts Privacy Code to make sure that it is relevant and remains current with changing industry standards, technologies and laws.

Summary of Principles

Principle 1 - Accountability

Maritime Inns & Resorts is responsible for personal information under its control and shall designate one or more persons who are accountable for Maritime Inns & Resort's compliance with the following principles.

Principle 2 - Identifying Purposes for Collection of Personal Information

Maritime Inns & Resorts shall identify the purposes for which personal information is collected at or before the time the information is collected.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a customer is required for the collection, use, or disclosure of personal information, except where inappropriate.

Principle 4 - Limiting Collection of Personal Information

Maritime Inns & Resorts shall limit the collection of personal information to that which is necessary for the purposes identified by Maritime Inns & Resorts. Maritime Inns & Resorts shall collect personal information by fair and lawful means.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

Maritime Inns & Resorts shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

Principle 6 - Accuracy of Personal Information

Personal information shall be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.

Principle 7 - Security Safeguards

Maritime Inns & Resorts shall protect personal information by security safeguards appropriate to the sensitivity of the information.

Principle 8 - Openness Concerning Policies and Procedures

Maritime Inns & Resorts shall make readily available to customers specific information about its policies and procedures relating to the management of personal information.

Principle 9 – Customer and Employee Access to Personal Information

Maritime Inns & Resorts shall inform a customer of the existence, use, and disclosure of his or her personal information upon request and shall give the individual access to that information. A customer shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Principle 10 - Challenging Compliance

A customer shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Maritime Inns & Resort's compliance with The Maritime Inns & Resorts Privacy Code.

Scope and Application

The ten principles that form the basis of The Maritime Inns & Resorts Privacy Code are interrelated and Maritime Inns & Resorts shall adhere to the ten principles as a whole. Each principle must be read in conjunction with the accompanying commentary. As permitted by the *Personal Information Protection and Electronic Documents Act* (Canada), the commentary in The Maritime Inns & Resorts Privacy Code has been drafted to reflect personal information issues specific to Maritime Inns & Resorts.

The scope and application of The Maritime Inns & Resorts Privacy Code are as follows:

- The Maritime Inns & Resorts Privacy Code applies to personal information collected, used, or disclosed by Maritime Inns & Resorts in the course of commercial activities.
- The Maritime Inns & Resorts Privacy Code applies to the management of personal information in any form, whether oral, electronic or written.
- The Maritime Inns & Resorts Privacy Code does not impose any limits on the collection, use or disclosure of the following information by Maritime Inns & Resorts:

- (a) an employee's name, title or business address or telephone number;
 - (b) information that Maritime Inns & Resorts collects, uses or discloses for journalistic, artistic or literary purposes and does not collect, use or disclose for any other purpose; or
 - (c) other information about the individual that is publicly available and is specified by regulation pursuant to the *Personal Information Protection and Electronic Documents Act* (Canada).
- The Maritime Inns & Resorts Privacy Code will not typically apply to information regarding Maritime Inns & Resort's corporate customers. However, such information may be protected by other Maritime Inns & Resorts policies and practices and through contractual arrangements.
- The application of The Maritime Inns & Resorts Privacy Code is subject to the requirements and provisions of the *Personal Information Protection and Electronic Documents Act* (Canada), the regulations enacted thereunder, and any other applicable legislation or regulation.

Definitions

collection: The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

consent: Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of Maritime Inns & Resorts. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

customer: An individual who purchases or otherwise acquires or uses any of Maritime Inns & Resort's products or services or otherwise provides personal information to Maritime Inns & Resorts in the course of Maritime Inns & Resorts's commercial activities.

disclosure: Making personal information available to a third party.

employee: An employee of or independent contractor to Maritime Inns & Resorts.

personal information: Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization.

Maritime Inns & Resorts: Maritime Inns and Resorts Incorporated

third party: An individual or organization outside of Maritime Inns & Resorts.

use: The treatment, handling, and management of personal information by and within Maritime Inns & Resorts or by a third party with the knowledge and approval of Maritime Inns & Resorts.

The Maritime Inns & Resorts Privacy Code in Detail

Principle 1 - Accountability

Maritime Inns & Resorts is responsible for personal information under its control and shall designate one or more persons who are accountable for Maritime Inns & Resort's compliance with the following principles.

- 1.1 Responsibility for compliance with the provisions of The Maritime Inns & Resorts Privacy Code rests with the Maritime Inns & Resorts Privacy Officer who can be reached at 1-902-752-5644 or via email at privacy@maritimeinns.com. Other individuals within Maritime Inns & Resorts may be delegated to act on behalf of The Maritime Inns & Resorts Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.
- 1.2 Maritime Inns & Resorts shall make known, upon request, the title of the person or persons designated to oversee Maritime Inns & Resort's compliance with The Maritime Inns & Resorts Privacy Code.
- 1.3 Maritime Inns & Resorts is responsible for personal information in its possession or control. Maritime Inns & Resorts shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.
- 1.4 Maritime Inns & Resorts shall implement policies and procedures to give effect to The Maritime Inns & Resorts Privacy Code, including:
 - (a) implementing procedures to protect personal information and to oversee Maritime Inns & Resort's compliance with The Maritime Inns & Resorts Privacy Code;
 - (b) implementing procedures to receive and respond to complaints or inquiries;
 - (c) training and communicating to staff about Maritime Inns & Resort's policies and

procedures; and

- (d) developing information materials to explain Maritime Inns & Resort's policies and procedures.

Principle 2 - Identifying Purposes for Collection of Personal Information

Maritime Inns & Resorts shall identify the purposes for which personal information is collected at or before the time the information is collected.

- 2.1 Maritime Inns & Resorts collects personal information only for the following purposes:

To enable us to make a reservation for you to stay in one of our rooms or for use of our facilities

For billing/invoicing purposes.

To obtain comment cards completed on a volunteer basis by the customer for suggestions to better serve the customer.

Customers may register for our Value Plus Club which rewards frequent purchasing. The personal information is only used if the customer signs the registration form. The customer can also voluntarily consent to receiving information on Special Offers from Maritime Inns & Resorts by email.

Further reference to "identified purposes" mean the purposes identified in this Principle.

- 2.2 Maritime Inns & Resorts shall specify orally, electronically or in writing the identified purposes to the customer at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within Maritime Inns & Resorts who can explain the purposes.
- 2.3 When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, the consent of the customer will be acquired before the information will be used or disclosed for the new purpose.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a customer is required for the collection, use, or disclosure of personal information, except where inappropriate. In certain circumstances personal information can be collected, used, or disclosed without the knowledge and consent of the individual.

- 3.1 In obtaining consent, Maritime Inns & Resorts shall use reasonable efforts to ensure that a customer is advised of the identified purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that can be reasonably understood by the customer.
- 3.2 Generally, Maritime Inns & Resorts shall seek consent to use and disclose personal information at the same time it collects the information. However, Maritime Inns & Resorts may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.
- 3.3 Maritime Inns & Resorts may require customers to consent to the collection, use and/or disclosure of personal information as a condition of the supply of a product or service only if such collection, use and/or disclosure is required to fulfill the explicitly specified, and legitimate identified purposes.
- 3.4 In determining the appropriate form of consent, Maritime Inns & Resorts shall take into account the sensitivity of the personal information and the reasonable expectations of its customers.
- 3.5 The purchase or use of products and services by a customer, may constitute implied consent for Maritime Inns & Resorts to collect, use and disclose personal information for the identified purposes.
- 3.6 A customer may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Customers may contact Maritime Inns & Resorts for more information regarding the implications of withdrawing consent.
- 3.7 Maritime Inns & Resorts may collect or use personal information without knowledge or consent if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill or mentally incapacitated.

- 3.8 Maritime Inns & Resorts may collect, use or disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting, using or disclosing the information, such as in the investigation of a breach of an agreement or a contravention of a law.
- 3.9 Maritime Inns & Resorts may collect, use or disclose personal information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.
- 3.10 Maritime Inns & Resorts may use or disclose personal information without knowledge or consent to a lawyer representing Maritime Inns & Resorts, to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law.

Principle 4 - Limiting Collection of Personal Information

Maritime Inns & Resorts shall limit the collection of personal information to that which is necessary for the purposes identified by Maritime Inns & Resorts. Maritime Inns & Resorts shall collect personal information by fair and lawful means.

- 4.1 Maritime Inns & Resorts collects personal information primarily from its customers.
- 4.2 Maritime Inns & Resorts may also collect personal information from other sources including credit bureaus or other third parties who represent that they have the right to disclose the information.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

Maritime Inns & Resorts shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Maritime Inns & Resorts shall retain personal information only as long as necessary for the fulfillment of those purposes.

- 5.1 Maritime Inns & Resorts may disclose a customer's personal information where the customer has consented to disclosure, when required by law or, where the services we are providing require disclosure to a third party.
- 5.2 Only Maritime Inns & Resorts employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about customers.
- 5.3 Maritime Inns & Resorts shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a customer, Maritime Inns & Resorts shall retain either the actual information or the rationale for making the decision for a period of time

that is reasonably sufficient to allow for access by the customer.

- 5.4 Maritime Inns & Resorts shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

Principle 6 - Accuracy of Personal Information

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

- 6.1 Personal information used by Maritime Inns & Resorts shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a customer.
- 6.2 Maritime Inns & Resorts shall update personal information about customers as necessary to fulfill the identified purposes or upon notification by the individual.

Principle 7 - Security Safeguards

Maritime Inns & Resorts shall protect personal information by security safeguards appropriate to the sensitivity of the information.

- 7.1 Maritime Inns & Resorts shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.
- 7.2 Maritime Inns & Resorts shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.
- 7.3 All of Maritime Inns & Resort's employees with access to personal information shall be required to respect the confidentiality of that information.

Principle 8 - Openness Concerning Policies and Procedures

Maritime Inns & Resorts shall make readily available to customers specific information about its policies and procedures relating to the management of personal information.

- 8.1 Maritime Inns & Resorts shall make information about its policies and procedures easy to understand, including:
 - (a) the title and address of the person or persons accountable for Maritime Inns & Resort's compliance with The Maritime Inns & Resorts Privacy Code and to whom inquiries and/or complaints can be forwarded;
 - (b) the means of gaining access to personal information held by Maritime Inns & Resorts;
 - (c) a description of the type of personal information held by Maritime Inns & Resorts, including a general account of its use; and
 - (d) a description of what personal information is made available to related organizations (e.g., subsidiaries).
- 8.2 Maritime Inns & Resorts shall make available information to help customers exercise control of the collection, use and/or disclosure of their personal information and, where applicable, privacy enhancing services available from Maritime Inns & Resorts.

Principle 9 - Customer Access to Personal Information

Upon request, Maritime Inns & Resorts shall inform a customer of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. A customer shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

- 9.1 Upon request, Maritime Inns & Resorts shall afford customers a reasonable opportunity to review the personal information in the individual's file. Personal information shall be provided in understandable form within a reasonable time, and at minimal or no cost to the individual.
- 9.2 In order to safeguard personal information, a customer may be required to provide sufficient identification information to permit Maritime Inns & Resorts to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.
- 9.3 Maritime Inns & Resorts shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, Maritime Inns & Resorts shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.
- 9.4 Customers can obtain information or seek access to their individual files by contacting the Maritime Inns & Resorts Privacy Officer.

Principle 10 - Challenging Compliance

A customer shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Maritime Inns & Resort's compliance with The Maritime Inns & Resorts Privacy Code.

- 10.1 Maritime Inns & Resorts shall maintain procedures for addressing and responding to all inquiries or complaints from its customers regarding Maritime Inns & Resort's handling of personal information.
- 10.2 Maritime Inns & Resorts shall inform its customers about the existence of these procedures as well as the availability of complaint procedures.
- 10.3 The person or persons accountable for compliance with The Maritime Inns & Resorts Privacy Code may seek external advice where appropriate before providing a final response to individual

complaints.

- 10.4 Maritime Inns & Resorts shall investigate all complaints concerning compliance with The Maritime Inns & Resorts Privacy Code. If a complaint is found to be justified, Maritime Inns & Resorts shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A customer shall be informed of the outcome of the investigation regarding his or her complaint.

Additional Information

For more information regarding The Maritime Inns & Resorts Privacy Code, please contact the Maritime Inns & Resorts Privacy Officer at 902-752-5644 or via email at privacy@maritimeinns.com.

Please visit the Privacy Commissioner of Canada's web site at www.privcom.gc.ca. [for more information regarding the Privacy act.](#)