



The Franklin Club (the “Club”)

Privacy Policy

Protecting the privacy and confidentiality of your personal information has always been a fundamental principle in our relationship with you, our Shareholders. The Privacy Pledge tells you how we will ensure the confidentiality and privacy of the information that you entrust us with.

Collection of Personal Information

The Franklin Club collects and uses personal information about its shareholders and members, including their spouses, (collectively “**Members**”) for the following purposes:

- *To maintain membership and shareholder records and information required by for the governance of the Club according to its by-laws and the Business Corporations Act, and any other laws of Ontario or Canada which may from time to time apply to the Club.*
- *To operate the Club in accordance with its rules, including processing of payments by Members for dues and other charges which they incur*
- *To compile information (such as through the log books and membership surveys) about usage and preferences of the membership to improve the overall use and enjoyment of the Club and to keep its operations in line with expectations of Members, taken as a whole*
- *To supply Members with financial information, and keep Members informed with information and news about events or other matters which are or may be of interest to Members*
- *To promote the use of the Club among the Members and encourage participation by Members in events promoted by the Club*
- *To promote the Club and its benefits to potential Members*

We will limit the collection of your personal information to only those details that are necessary for the purposes identified. Your personal information will only be used for the purposes for which it was collected. The Club uses reasonable efforts to ensure that all personal information is accurate by reminding Members from to time to keep their information current and up-to-date, and by actively attempting to obtain correct information when it becomes clear the personal information is wrong or has ceased to be accurate.

Retention and Protection of Personal Information

Procedures reasonable to the protection of this information are maintained and informally or formally reviewed from time to time to ensure that personal information remains secure. Employees with access to personal information are given access only for the identified purposes, are made aware of the confidentiality of the personal information, and of the need to adhere to the security measures in place to maintain the security of the personal information.

Disclosure of Personal Information

In general, the Club does not disclose personal information about its Members to any third persons or organizations without specific written consent, unless:

- *disclosure is required or compelled by law*
- *disclosure is necessarily incidental to the purposes for which personal information is collected.*
For example,
 - i) *By necessity, the fishing log book is available for anyone in the Clubhouse to see and the Members' assigned membership numbers are available from the rack of Members badges in the Clubhouse*
 - ii) *the Troutline or other bulletins or communications may contain news in which individuals are identified and/or their pictures, including casual or candid pictures taken while on the premises of the Club, are published*
 - iii) *with the intent that Members use it only for personal use, annually the Club compiles and distributes to all Members a roster which is a listing of each Member, including his or her spouse, and their telephone number only (the "Roster"). The Club uses reasonable efforts to ensure that Members are aware that the Roster is for personal use only, but the Club is not responsible if Members abuse this restriction.*

Any Member may request (in writing) that his or her name be omitted from the Roster, in which case the Club will not include such Member in any Roster distributed any time after 3 days from the receipt of such notice

The Franklin Club does not rent or sell lists of Members.

Consent to Collection, Use and Disclosure

Except where this Privacy Policy requires specific consent, the Club is of the view that all of the purposes for collection, use and disclosure of personal information set out in this Privacy Policy are incidental to the recreational and social nature of the Club. Therefore, the consent of the Members to the collection, use and disclosure of personal information, as set out in this Privacy Policy, is implied at the time that a Member joins the Club.

Access

Members are entitled, within a reasonable time, not exceeding 21 days, to access the personal information held by the Club concerning them (but no one else). Any information which is shown by such inspection to be inaccurate or incomplete will be corrected promptly.

Chief Privacy Officer

The Chief Privacy Officer of the Club will be appointed by the Board from among the members of the Board, and failing such appointment or resignation of such individual from the Board, the Chief Privacy Officer will be the Secretary of the Club. The name and telephone number of the Chief Privacy Officer can always be obtained by Members by called the business office of the Club during normal business hours.

The Chief Privacy Officer is accountable for the implementation and maintenance of this Privacy Policy.

Complaints

Any Member can challenge the Club's compliance with this Privacy Policy by filing a Notice of Complaint with the Chief Privacy Officer, which is done by giving a written notice, containing reasonable detail about the complaint, in a sealed envelope directly to the Chief Privacy Officer or to the General Manager of the Club for delivery to the Chief Privacy Officer. Upon receipt of a complaint, and without unreasonable delay, the Chief Privacy Officer will investigate the complaint, including discussion with the complainant and any other person who may have information relevant to the complaint, with a view to resolving the complaint to the complainant's satisfaction, but always in a way that is consistent with the Privacy Policy and the articles, by-laws and rules of the Club from time to time in effect. If the Chief Privacy Officer is unable to resolve a complaint to the complainant's satisfaction, the complainant may request that the issues raised in the complaint be dealt with a meeting of the Board. The decision of the board will be final, subject to any legal rights of review or appeal.