

Safeguarding your Personal Information

At Sonora Resort, we will not collect, use, or disclose your personal information without your consent – except as required or permitted by law. We do not and will not sell or rent your personal information to anyone for any reason. Personal information you provide to us will only be used by us as part of our ongoing efforts to provide you with superior service and selection.

We know that we earn your business and your trust with each transaction. And that is why we will take every step necessary to protect your privacy by safeguarding any personal information we collect and/or store during the course of doing business together.

Our mandate for protecting your privacy is to ensure that our privacy standards meet or exceed the guiding principles established in Canadian federal and provincial privacy legislation.

Sonora Resort is responsible for personal information it holds or is under its control. We have designated a person to act as our Privacy Officer, whose duties will include monitoring Sonora Resort compliance with relevant legislation, replying to our valued customer's questions, as well as responding to requests by individuals for access to and correction for any personal information Sonora Resort has collected on them.

We adhere to Ten Privacy Principles to ensure your personal information is protected.

SONORA RESORT 10 PRINCIPLES OF PRIVACY PROTECTION

Principle 1 - Accountability

Sonora Resort is responsible for maintaining and protecting the customer information under its control. In fulfilling this mandate, Sonora Resort has designated an individual who is accountable for the Company's compliance with the Ten Privacy Principles.

Principle 2 - Identifying Purposes

The purposes for which your information is collected, used or disclosed shall be identified before or at the time the information is collected, used or disclosed. Sonora Resort will limit the collection and use of your information to the minimum we require to deliver superior service to you, our customer; this includes advising you about our products, services and other opportunities and those of select third parties, recognition of returning guests, post stay follow-ups and surveys and to administer our business.

Principle 3 - Consent



Your knowledge and consent (express or implied) are required for the collection, use or disclosure of your personal information except where required or permitted by law.

Principle 4 - Limiting Collection

Any personal information we collect from you is limited to those details necessary for the business transaction, as described further below, and we only collect this information using fair and lawful means.

Principle 5 - Limiting Use, Disclosure and Retention

We will only use or disclose your personal information for the purpose for which it was collected - unless you provide us with consent to do otherwise or when it is required or permitted by law. We will not retain your personal information any longer than required to fulfill the needs of why we collected the information to begin with.

Principle 6 - Accuracy

Our commitment is to maintain your personal information as accurate, complete and up-todate as is necessary for the purpose that we collected it for in the first place.

Principle 7 - Safeguarding Customer Information

At Sonora Resort, we are committed to protecting your personal information with safeguards appropriate to the sensitivity of that information.

Principle 8 - Openness

At Sonora Resort, we will answer your questions about our privacy policies, procedures, and our management of your personal information in as understandable a format as possible.

Principle 9 - Customer Access

If you require details on your personal information at Sonora Resort, please send us a written request. Upon receipt of this request, Sonora Resort will inform you of the existence, use and disclosure of your personal information and will provide access to that information, except where the law requires or permits Sonora Resort to deny access. We will provide you information within a reasonable time period and provide an explanation if we are unable to meet your request. Some inquiries may entail a charge, but we will provide an estimate for the amount in advance.

Principle 10 - Handling Customer Complaints and Suggestions

Our commitment is to handle questions about our privacy principles, practices or any suggestions to improve promptly. Please direct your communications to the Sonora Resort Chief Privacy Officer at <u>privacy@sonoraresort.com</u>.



CATEGORIES OF PERSONAL INFORMATION WE COLLECT, USE AND DISCLOSE

At Sonora Resort, we gather and use personal information to provide you with the services you have requested or to offer additional products and services we believe you might be interested in. Providing us with your personal information is always your choice.

Most of the information we collect comes to us directly from you, and only with your consent.

Some of the information you provide may form part of your guest profile which is used by Sonora for the purpose of managing your booking and providing you with superior service and experiences while at Sonora.

The types of information we may ask for depends on the nature of our service to you.

Sonora Services and Experiences

Certain information may be requested from you in order for you to participate in some of the activities offered at Sonora. For example, you must obtain a fishing license in order to go fishing (which may be provided to the applicable government agency) and which requires contact information, birthdate, height and eye colour; you may be asked certain health related questions to best ensure your safety and comfort when attending our spa; Sonora may make a note of any allergies you have to ensure your health while dining with us; if you advise us you have preferences related to your booking or any activities, we may note that on your guest profile in an effort to accommodate those preferences .

In-store purchases

We do not, as a condition of the supply of a product or service to you, require you to consent to the collection, use, or disclosure of your personal information beyond that information which we require to deliver superior service to you, our customer; this includes advising you about our products, services and other opportunities, and to administer our business.

We may need to collect contact and payment information from you to complete a transaction. Examples where we may need contact information includes arranging for home delivery of items you may have purchased, completion of fishing licenses, and accepting product returns.

Newsletters or publications

You may from time to time be given an option to receive communications (either hard copy or email) from Sonora Resort concerning such things as new offerings, featured merchandise, newsletters or special offers. Should you choose to enroll; we will collect your contact information (such as name, address and/or e-mail address in the case of electronic newsletters).



Subsequent to enrolling you will be given the option with each communication to remove yourself from the distribution list.

Contests and promotions

In addition, Sonora Resort may also run contests or promotions which may be available online or at the resort. All contests and promotions are subject to rules that will be available with each particular contest or promotion. Should you choose to participate, you will be asked for contact information which will only be used to contact you should you win. Winners are legally required to answer a skill testing question.

Sonora Resort contest and promotion forms may also ask additional optional survey questions in order that we may improve our product and service offerings. Your participation in answering the optional questions is not a condition of entering any contest or promotion.

Disclosure to third party service providers

In the process of meeting your needs and providing the services you desire, Sonora Resort may share your information with certain third party service providers such as (but not limited to): to create a booking account, to make your on-line reservation, to verify and validate information that you have provided to us, to provide products and services directly to you, to improve the quality of service and experiences we may offer to you while at Sonora, to best protect your health and safety while participating in activities offered at Sonora, and to enquire into and address customer service issues that you may have. We will use reasonable efforts to ensure that your personal information is used in a manner that is consistent with Sonora Resort 10 Principles of Privacy Protection and our policy.

Examples of third party service providers would include credit card issuers and processors, various delivery services, database services and reservation service providers, guides and spa services. If you do not wish us to provide your personal information to these service providers there may be certain situations where we may be unable to process the transaction or provide our services to you.

Cookies and tracking notice

To help us improve our website and deliver a better and more personalized service to you, we use cookies and other automatic data tracking technologies (see definition of "Tracking Tech" below) to collect certain information as you navigate through our website and digital properties. The type of information we collect may include:

Details about your interaction with our website and digital properties, such as: date, time, length and frequency of visits, pages and content viewed, page interactions (such as scrolling, clicks and mouseovers), action taken (such as booking reservations);



Frequency communications are opened, action taken and links clicked;

Information about your device used and internet connection, such as your IP address, device type, device unique identifiers, operating system, browser type, referral URL and similar details.

We use various forms of technology to carry out our automated data collection ("Tracking Tech"), such as:

Cookies. When you visit our website, you will be assigned a "cookie" (a small text file) to be stored on your computer or device. Cookies consist of a unique number that distinguishes you from other visitors. Cookies don't run code or contain viruses. Cookies store bits of information that we use to help make our website work better.

Cookies help to identify you when you visit or return to our website. Cookies can be used to offer personalized web page content, remember your preferences, track your activity on the website, and to otherwise improve how you interact and experience our website.

You can refuse to accept most cookies or disable or delete individual cookies by activating the appropriate settings on your browser, but please note that if you refuse to allow cookies, you may not be able to use certain features of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our website.

Web Beacons, Pixels & Tags. Web beacons are also known as *clear GIFs, web bugs, tracer tags* or *pixels*, and may be used alone or in combination with cookies. These are small objects embedded into a web page on our website or other digital properties, and are used for many of the same purposes as cookies and allow us to gather aggregate statistics about website usage patterns, such as how many times a link or a page on a website is visited, how many of our emails were opened, activity generated by emails and support ongoing customer communications.

You may be unable to decline web beacons or pixels on our website, but going to browser settings to turn off cookies may render them ineffective. There are also browser add-ons and extensions that may specifically block web beacons.

General

All the information you provide to us is securely maintained and is kept strictly confidential to a level appropriate to the level of sensitivity of the information. We use a variety of security measures such as restricting employee access to files, data centers, and using locked file cabinets. In addition we make use of electronic security measures such as passwords, personal ID numbers and data encryption as appropriate.



Employees must conform to Sonora Resort Privacy Code and observe the highest standards of confidentiality. We subscribe to the general principle that only those employees that need to know the information in order to provide you services have access to your information.

Sonora Resort may disclose your information as permitted or required by law: examples of this would be:

- to comply with a subpoena, warrant or order issued or made by a court, person or body with jurisdiction to compel the production of personal information;
- to an entity, which may be a government institution or other person that has lawful authority to obtain the information;
- to a public body or a law enforcement agency concerning an offence under the laws of Canada or a province;
- To our internal or external legal counsel.

When is my information removed?

We keep your personal information on file as long as we need it to provide you with a service and to meet legal requirements. When it is no longer needed we destroy the information or render it anonymous.

Should you desire, you can contact our Chief Privacy Officer and request that we remove your information from our records. We will make every reasonable effort to honour your request, however, we may retain some information you have requested removed to prevent fraud, collect moneys owed, resolve disputes, and to comply with federal and provincial legal requirements.

Changes to our Privacy Policy

Our business constantly changes to meet the needs of our customers and as a result our policies and procedures pertaining to privacy and security are also subject to change. We reserve the right at any time to change or modify any of our practices, policies and procedures which relate to privacy and security. A current version of our privacy policy is available at www.sonoraresort.com.

Chief Privacy Officer

Sonora Resort has appointed a senior member of their management group to the role of Chief Privacy Officer. It is this person's role to ensure that Sonora Resort meets our customers' expectations surrounding privacy.

If you have questions or concerns regarding Sonora Resort Privacy Policy please contact us:

(By mail):

Sonora Resort Privacy Policy



Chief Privacy Officer Sonora Resort 4580 Cowley Crescent Richmond BC V7B 1B8

(By phone):

Phone: (604) 448-1055 Or toll free 1 (866) 805-8283 (within Canada)

(By e-mail):

privacy@sonoraresort.com

Other privacy resources on the Web

- The Office of the Information and Privacy Commissioner for British Columbia
- The Office of the Information and Privacy Commissioner of Alberta
- Office of the Privacy Commissioner of Canada

How can I access my information?

You may access and verify your information and find out to whom we have disclosed it to at any time by contacting us at <u>privacy@sonoraresort.com</u>. There may be a nominal cost for this service. At the time of your request, we will need specific information from you to verify your identity before we can provide you with the requested information.

Upon receiving such a request, Sonora Resort will:

- Inform you about what type of personal information we have on record, how it is used and to whom it may have been disclosed;
- Provide you with reasonable access to your information so you can review and verify the accuracy and completeness and request changes to the information;
- Make any necessary updates and amendments to your personal information.

There may be instances when we will not be able to provide you with access to all of the Personal Information that you have requested. Examples are if the information,

- contains references to other persons;
- has already been destroyed in accordance with our policy of only keeping your information for as long as it is needed;
- is subject to solicitor-client or litigation privilege.

You may also contact our Chief Privacy Officer at any time to let us know that you do not wish to receive any further communication from us or to ask us to change your preferences regarding how we use or disclose your information.



If you have a complaint or a question for us

We are committed to setting the highest customer service standard within the hospitality industry. We hope you give us the opportunity to correct any situation that does not meet your expectations.

If you have any concerns about privacy, confidentiality or our policies and procedures we want to know about it. All inquires relating to personal information will receive prompt attention and be acknowledged within 5 business days.

It's all about trust

We will continuously assess ourselves to ensure that customer privacy is respected. We will conduct our business in a manner that meets the expectations of our customers.