



Victoria Golf Club Website Privacy Policy

The Victoria Golf Club (“**VGC**” or “**the Club**”) is committed to protecting the privacy of members and visitors who use its website (“**Site**”) to browse, read pages, download information, register for an event or access our member portal (“**Portal**”) This Policy explains the type of information that the Club collects, uses and discloses through the Site and how it is protected.

If you have questions about how VGC collects, uses or manages personal information through this Site, please contact the Club’s Privacy Officer at the address found below.

This Site allows VGC members and members of the public (“**Users**”) to browse and download information, register for events and communicate with us. This Site also allows authorized Users to access and use the Portal.

Personal Information Collected

Some of the personal information collected through this Site is collected automatically when you use or visit the Site, and some of the personal information that is collected is voluntary provided by Users, such as when you submit questions or register for an event or service or access the Portal.

VGC is responsible and has control of personal information that the Club collects through the Site. For example, when you browse this Site or make inquiries of VGC, the Club collects and safeguards any personal information that is collected about you.

Information Automatically Collected

When you visit the Site to browse, read pages, download information or access the Portal, some information is automatically collected about you.

Depending on how you interact with this Site, that information may include:

- your internet protocol (“**IP**”) address;
- your browser, operating system and device characteristics;
- usage data, such as the date and time of the visit; and
- your activity on the Site, such as webpages or files viewed, search and other information about use of the Site.

Information collected automatically is used for purposes such as administering the Site, assessing system performance, improving web services, workforce planning and Site security and management. VGC does not collect or use this information in identifiable form, and the Club does not attempt to identify individual users from this data.

Information You Supply to VGC

Personal information VGC collects and processes also includes information that you voluntarily provide to the Club when you register for an event, post materials on, or use the Portal to submit questions or inquiries or information.

In these cases, VGC may use your personal information to provide services to you, respond to your questions, communicate with you, to facilitate your participation in an event, to answer your inquiries or complaints, or to comply with legal obligations. Information the Club may collect about you for these purposes includes:

- name;
- contact information;
- user names, passcodes and contact preferences; and
- usage data and content that you post on the Portal.

How VGC Processes Your Personal Information

Depending on how you interact with this Site, VGC may process your personal information for any one or more of the following reasons:

- to create and manage your member account and authenticate your identity;
- to deliver services to you;
- to respond to questions, inquiries or requests for services or to provide support to you in connection with the use of this Site or our services;
- to communicate with you and to enable your communications;
- to assess, evaluate and improve this Site and VGC's services; and
- to comply with legal requirements.

Who VGC Shares Data With

VGC utilizes employees and service providers to operate the Site, and they may have access to personal information on a need-to-know basis.

Some information about Site and service usage may be aggregated and used by the Club for the purposes of evaluating and improving our services, but no information in identifiable form is used or disclosed for these purposes.

How Your Data is Stored

All personal information collected through the Site by VGC and its service providers may be retained on third-party servers located inside or outside of Canada. VGC complies with local personal information protection laws, which require that the Club retain your data for at least one (1) year if it is used to make a decision about you. Otherwise, VGC will seek to destroy data as soon as it is no longer needed for business or legal purposes.

How VGC Protects Your Information

Privacy laws in Canada require that VGC protect your personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure, or disposal. Security measures have been integrated into the design, implementation and day-to-day operating practices as part of the VGC's continuing commitment to the protection of personal information.

Cookies and Web Analytical Tools

To improve your experience on this Site, the Club may use "cookies". A cookie is a small text file that our Site may place on your computer as a tool to remember your preferences. You can refuse the use of cookies by selecting the appropriate settings in your browser. However, please note that if you do this, you may not be able to use the full functionality of this Site.

Cookies are used to collect anonymous traffic data to assist the Club with web analytics. Web analytics are tools that analyze how the Site is used and to improve visitors' online experience. These tools work by tagging web pages to capture a limited amount of data (including the IP address) of the computer. None of the data compiled using these tools is used by the Club or by its service providers to try to identify you.

VGC also wants you to know that the Club limits its use of cookies. Some organizations use persistent cookies, which retain information and identify you whenever you access a website. We use sessional cookies, which are used to help you move around our Site and but do not store

personal information after you leave the Site. Sessional cookies are valid only during the time you are actually using the Site.

VGC uses Google Analytics in order to better understand how users engage with this Site and to improve user experience. If you do not wish Analytics to be used in your browser, you can install the Google Analytics Opt-out Browser Add-on. Learn more about Google Analytics and privacy at www.google.com/policies/privacy/.

Your Rights

VGC is subject to the BC *Personal Information Protection Act* (“**PIPA**”), and the Club works hard to ensure that all collection, use and disclosure of personal information through the Site is fully compliant with PIPA.

Under PIPA, you have the right to request access to your personal information within the Club’s control. You also have the right to request correction of your personal information and to be told how your information is collected, used and disclosed by the Club. Complaints under this Policy may be directed to VGC’s Privacy Officer at the address found below.

Changes to this Policy

VGC may update this Privacy Policy from time to time to reflect changes in its practices or legal requirements. The revised policy will be posted on the VGC website. VGC encourages you to periodically review this policy for updates and changes.

Privacy Officer Contact Information

The Privacy Officer, or designated individual, is responsible for ensuring VGC’s compliance with this policy and PIPA. The Privacy Officer is the Club’s General Manager. Any questions or concerns about this Privacy Policy or VGC’s privacy practices should be directed to the Privacy Officer at:

Victoria Golf Club

1110 Beach Drive

Victoria, BC V8S 2M9

Phone: (250) 598-4321

Email: privacy@victoriagolf.com

If the Privacy Officer is unable to resolve the concern, the complainant may write to the Office of the Information and Privacy Commissioner for BC.

Approval – This policy was approved by the VGC Board of Directors on January 14, 2025.

This Privacy Policy may be updated from time to time.