



Atlantic Chamber of Commerce Privacy Policy

Introduction

Protecting your privacy and the confidentiality of your information—over the Internet, on the telephone, or through our offices—has always been fundamental to the way we do business at the Atlantic Chamber of Commerce. We operate on the basis of a Privacy Policy that guide the handling of the personal information we collect. We have created this privacy statement in order to demonstrate our firm commitment to protecting the privacy of our members, partners and potential Web site visitors. This policy and related procedures are consistent with the Canadian Standards Association Model Code for the Protection of Personal Information as found at Schedule 1 of the *Personal Information Protection and Electronic Documents Act*, SC 2000, c. 5 (the “Act”).

Privacy Statement

This policy deals only with personal information handled by the Atlantic Chamber of Commerce. Personal information is information about an identifiable individual, excluding business contact information. The following explains how the Atlantic Chamber of Commerce handles personal information. The Atlantic Chamber of Commerce reserves the right to change this policy and it may be updated periodically. In the event of a change in the policy which will affect our use of your personal information the Atlantic Chamber will provide notice of the changes to all necessary individuals.

Accountability

The Atlantic Chamber of Commerce (herein the “Atlantic Chamber”) is accountable for all personal information under its control. The Atlantic Chamber’s privacy officer is the Manager, Administrative Services who is designated as responsible for the Atlantic Chamber’s privacy policy. The privacy officer can be reached by:

email at: tracy@atlanticchamber.ca

telephone at: +1 (902) 698-0265

or mail at:

Atlantic Chamber of Commerce

PO Box 2291

Windsor, NS B0N 2T0

Any questions about the Atlantic Chamber’s handling of personal information should be directed to the Privacy Officer. Please see below for more information about the process for referring questions about the Atlantic Chamber’s handling of personal information.



Purpose of Personal Information

The purpose for which the Atlantic Chamber collects, uses, or discloses personal information will be identified at or before the time the information is collected. The Atlantic Chamber may collect personal information for the purposes of:

- administering Atlantic Chamber membership and providing member services;
- registering for Atlantic Chamber events, for example the Annual General Meeting;
- purchasing various Atlantic Chamber products or services including document certification; and
- processing and administering the above or other purposes as necessary.

The Atlantic Chamber will not collect, use, or disclose personal information for any other purpose than identified at or before the time of collection, unless otherwise authorized in accordance with applicable legislation.

Member Services

The Atlantic Chamber may collect contact information from its members in order to:

- send out newsletters and other relevant information
- inform members of upcoming Atlantic Chamber events
- send out invoices and otherwise administer Atlantic Chamber membership

This contact information is voluntarily provided by Atlantic Chamber members. Members may, at any time, be taken off of Atlantic Chamber mailing lists at their request.

Through external merchants, the Atlantic Chamber offers various services to its members through programs such as: the Chamber of Commerce Group Insurance Plan.

Members who chose to participate in programs should refer directly to the privacy policies of the sponsoring companies. The Atlantic Chamber does not collect, use or retain any personal information from these programs.

Consent

The Atlantic Chamber seeks consent for all personal information we collect, use and disclose through information provided to individuals prior to collection, or at the time of collection. For information which is considered to be more sensitive, for example credit card numbers, the Atlantic Chamber will ask for a signature as a sign of consent.

If information is voluntarily provided, this constitutes consent to the collection, use and disclosure of personally identifiable information only for a purpose that would be considered obvious to a reasonable person. In the majority of cases, the Atlantic Chamber will seek consent to collection, use and disclosure. The Atlantic Chamber will not use personal information for any purpose other than that for which



consent has been provided. Should the Atlantic Chamber require use of personal information for a new purpose, consent will be sought for that new use.

Limits for Collecting, Using, Disclosing and Keeping Personal Information

The Atlantic Chamber does not collect, use or disclose personal information of individuals except when individuals give consent, provide the information on a voluntary basis, or as required or authorized by law. There may be occasions where more specific personal information is necessary for us to proceed with a request for information, or provide you with a product or service. In such cases, we will provide you with a description on the information we need. In all cases, the Atlantic Chamber limits the amount and type of information collected to only the personal information that is required to provide the individual with the requested information, product, or service. We collect only information that is voluntarily provided by you and undertake that such information will be kept strictly confidential.

The Atlantic Chamber may disclose personal information collected by it without the knowledge or consent of the individual, in certain circumstances prescribed by the Act, for example to its lawyers; for purposes relating to an investigation or proceeding, or where required by law to disclose the information. The Atlantic Chamber will not use or disclose personal information without the consent of the individual except as authorized by applicable law.

We retain personal information only as long as is necessary to provide the individual with the requested product, service or information and delete or destroy this information after that time. In some cases, however, legal reporting and retention requirements necessitate that the Atlantic Chamber retain information for a specific amount of time. If the Atlantic Chamber uses an individual's personal information to make a decision that directly affects the individual, the Atlantic Chamber will retain that information for at least one year after using it.

The Atlantic Chamber does not sell or trade any personal information with third parties. The Atlantic Chamber may transfer information to service providers where information processing is outsourced by the Atlantic Chamber in the course of its administrative procedures or member services in specific cases. Where personal information is transferred to a service provider for processing, we require the service provider to respect this Privacy Policy and we restrict them from using or disclosing personal information transferred to them for any purpose other than the provision of services to us.

Any personal information that the Atlantic Chamber retains is kept in such a manner as to ensure its security and confidentiality at all times.

Safeguarding Personal Information

The Atlantic Chamber respects the privacy of our members, partners, potential website visitors and internet users and will protect that privacy as vigorously as possible. We store personal information in



electronic and physical files that are secure. Our security measures include secure locks on filing cabinets, and using industry standard techniques such as firewalls, encryption, intrusion detection and restricted access to records and to equipment, including computers. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or receive from us electronically. This is especially true for information you transmit to us via e-mail. Once we receive your transmission, we make our best efforts to ensure its security on our servers.

Accuracy of and Access to Personal Information Collected

The Atlantic Chamber makes every reasonable effort to keep personal information as accurate, complete, current and relevant as necessary for the identified purposes. The Atlantic Chamber does not routinely update personal information.

The Atlantic Chamber makes readily available to individuals our Privacy Policy and related procedures for managing personal information. We provide access to the Privacy Policy and related procedures to individuals on the Atlantic Chamber's Web site and in written form. Any questions about the handling of personal information by the Atlantic Chamber can be raised with our Privacy Officer.

At the written request of an individual, he or she may access or request a correction of their personal information as collected by the Atlantic Chamber. In case of an access request, the Atlantic Chamber will inform them of the personal information we have about the individual under our control, what it has been and is being used for and, in cases where it has been disclosed, to whom it has been disclosed. There may be exceptional circumstances which the Atlantic Chamber may not be able to give an individual access to the personal information about her or him held by the Atlantic Chamber. In this case the Atlantic Chamber will explain the reason for this lack of access, as provided by the relevant provision of the Act.

To make a request, please send a letter, email or fax addressed to our Privacy Officer at the address indicated above. In any written request, please include the following information:

Name

Contact details

Membership number or number (where applicable)

Nature of the request, for example:

- access and/or correct information
- inquire regarding use and/or disclosure

If an inquiry concerns a specific transaction, please indicate the date of the transaction, and provide a receipt number if applicable.



The Atlantic Chamber will reply to your request in no later than thirty days after receipt of the request, or if we are not able to respond within this time period, we will send you a notice of extension. If we are not able to provide you with access to all the personal information about you that is under our control, we will give you a reason for our inability to do so, unless prohibited by law.

When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, the Atlantic Chamber amend the information as required.

Questions and Complaints

Any questions, comments, or complaints about the Atlantic Chamber's handling of personal information should be directed to our privacy officer.

Complaints should be in writing and the Atlantic Chamber will provide notice of receipt of the complaint within one week of post mark date. Within a reasonable time of receipt of the complaint, the privacy officer will conduct an investigation into the complaint. The format of this investigation may vary, depending on the circumstances. Within a reasonable time of conclusion of the investigation, the privacy officer will inform the complainant of the outcome of the complaint.

Use of the Atlantic Chamber of Commerce Website

The Atlantic Chamber believes that online privacy is important to the success of the Internet and electronic commerce in general and is strongly committed to each visitor's right to privacy. This statement sets forth the Atlantic Chamber's Privacy Policy for its website located at www.atlanticchamber.ca and describes the practices that the Atlantic Chamber follows in respect to the privacy of the users of this site. By accessing and using materials from this website or sending or posting materials to it, you (the "user") agrees to the terms of this privacy commitment and to our practices to collect, use or disclose personal information.

This Privacy Statement may be updated periodically to reflect enhancements to the Atlantic Chamber website that may affect the use of personal information. Accordingly, please check back periodically.

Information on this Website

Information which includes all facts, data and other information, collectively the "Information" in the pages of this website is of a general nature, is intended only for informational purposes, is subject to change without notice, and is not intended to be relied on by visitors as binding legal advice on any particular matter.



Individual information provided to the Atlantic Chamber to gain access to any feature of this website will not be sold or made available to any third party, except where information processing is outsourced by the Atlantic Chamber in the course of its regular administrative procedures.

The Atlantic Chamber reserves the right to perform statistical analyses of aggregated user behavior and characteristics, in order to measure interest in and use of the various sections of its site so as to improve design and navigation and to gather information for marketing purposes. Only aggregated data from these analyses, not personally identifiable individual data, will be used for this purpose.

Accuracy of the Information on this Website

The information is believed to be accurate, complete and current when posted, but the Atlantic Chamber cannot guarantee that it will remain accurate or complete or that it will be current at all times.

The Atlantic Chamber is not responsible for direct, indirect, special or consequential damages, regardless of the cause, arising out the use of this website.

Accuracy of Information on Linked Websites

Through the links to other sites found on the Atlantic Chamber's website, the user may enter domains that are beyond the boundaries of the Atlantic Chamber and, once there, the Atlantic Chamber is not responsible for the privacy practices or the content of these websites. The Atlantic Chamber has no control over the accuracy, completeness or relevance of the information on these sites and provides links to these sites solely for the information and convenience of visitors to our website.

Copying Information from this Website

The information on the Atlantic Chamber website may be used or copied provided that it is used or copied accurately, or is used in its entirety and/or that the source of the information is clearly identified. Only a Member of the Atlantic Chamber may use the information for commercial purposes. The Atlantic Chamber is not responsible for the way in which the information may be used or copied. The Atlantic Chamber reserves the right to change, delete or add information at any time.