

# **PRIVACY POLICY AND PERSONAL INFORMATION PROTECTION**

At Golf Le Versant Centre, we place great importance on protecting the personal information of our clients, employees and representatives. In accordance with the Act respecting the protection of personal information in the private sector, we are committed to preserving the confidentiality of personal information collected as part of our activities. The purpose of this privacy policy is to inform you about our practices for collecting, using, disclosing, retaining and protecting your personal information. By providing us with your personal information, you accept the terms of this policy and authorize us to process your information in accordance with it.

## **1. Consent**

### **1.1 Commitment to privacy protection**

We are committed to protecting the privacy of our users. We collect and use personal information only with their explicit consent and in accordance with applicable laws.

### **1.2 Acceptance of the terms of our policy**

By accessing our website <https://golfleversant.com/> or by providing us with personal information, you accept the terms of our privacy policy. This includes your consent to the collection and use of your personal information in accordance with this policy.

### **1.3 Right to withdraw consent**

You have the right to withdraw your consent at any time. However, this is subject to certain legal or contractual restrictions. We will inform you of the possible consequences of such withdrawal, such as the inability to provide certain products or process certain requests. Your decision to withdraw will be recorded in our files.

### **1.4 Exceptions to the need for consent**

In certain exceptional circumstances, we may collect, use or disclose personal information without first obtaining your consent. This may occur in situations where legal, medical or security requirements make obtaining your consent impossible or impractical. These situations include, but are not limited to, suspected breach of contract, fraud prevention or detection, or law enforcement requirements.

## **2. Collection of personal information**

### **2.1 We collect personal information through various means, such as:**

- Emails and communications with our customer service department
- Online request forms
- Mobile application offered to our clients
- Cookies and similar technologies on our website

### **2.2 We may also collect information through third parties, such as:**

- A technology service provider, such as an ordering platform or newsletter service.
- A recruitment portal that allows candidates to submit their resume and personal data.
- Professional social networks such as LinkedIn for recruitment or marketing purposes.
- A consultant who provides part of the services we offer to our clients.
- An agency responsible for responding to questions or handling complaints from our clients.
- A customer satisfaction survey company that collects feedback on our products or services.
- An online payment service provider to process financial transactions.

- A cloud computing company storing client data.
- A digital marketing company analyzing user behaviour on our website.
- An IT security service provider that monitors threats and protects data.
- A customer relationship management (CRM) company that helps organize and analyze customer interactions.
- A logistics provider managing product delivery and collecting information about recipients.

**2.3 We may use advanced technologies to collect personal information, including to identify, locate or profile our clients (for example, to create consumer profiles). However, we are committed to ensuring the protection of our clients' privacy:**

- **Responsible use of technology:** We use these technologies solely to improve our services and better understand our clients' needs.
- **Activation of features:** By default, these features are disabled to protect data confidentiality. Our clients always have the choice to enable or disable these features according to their preferences.

We are committed to being transparent about the use of these technologies and respecting our clients' privacy choices.

**3. Types of personal information collected**

**3.1 We collect various types of data, including but not limited to:**

- Personal identifiers (name, mailing address, email, phone number)
- Demographic data (age, ethnic origin, nationality, place of residence)
- Biometric data (fingerprints, facial recognition)

**3.2 Children's privacy**

We do not knowingly collect or solicit personal information from children under the age of 14. By using our website, you represent that you are at least 14 years old. If you are under 14, please do not attempt to send us any personal information. If we discover that we have inadvertently collected personal information from a user under the age of 14, we will attempt to delete this information from our files and records immediately. We also encourage minor users of the website aged 14 or older to ask permission from their parents or guardians before sending any information about themselves over the Internet.

If you believe that a child under the age of 14 has provided us with personal information, please contact us using the contact information provided in the following section.

**4. Use of personal information**

**4.1 We use your personal information for a range of essential activities:**

- **Responding to requests:** To effectively respond to your requests and inquiries.
- **Transaction management:** Processing payments and issuing receipts for transactions made.
- **Registrations and participation:** Managing your registrations for events, training sessions, newsletters, downloads from our website, or participation in webinars.
- **Human resources management:** For internal human resources management and administration, recruitment, employment contracts and service agreements.
- **Improving the user experience:** Operating, maintaining and improving our website, personalizing your online experience, and providing requested services and information.
- **Marketing communications:** Sending relevant information, special offers and news, with the option to unsubscribe at any time.

- **User account management:** Managing your user account to access various features of our site.

These uses are intended to enhance your experience with our services and facilitate effective interaction with our organization.

#### **4.2 We offer various options to allow you to control and limit the collection of your personal information. These options include:**

- **Communication choices:** You can choose to receive our communications through different means (phone, SMS, email), or refuse them entirely.
- **Account settings:** When creating an account on our site, you have the option not to participate in certain services or loyalty programs.
- **Cookie management:** Our site allows you to decline or customize the use of cookies. Please note that blocking certain cookies may affect the accessibility and functionality of our site.
- **Granular consent:** In most situations, when we collect information for specific purposes, you have the option to consent only to certain uses of your data.

It is important to note that some of these options may limit your access to all features of our service. For example, by declining certain cookies, certain parts of our website may not function as intended, or by choosing not to create an account, certain personalization features may not be available.

### **5. Sharing and disclosure of personal information**

#### **5.1 Personal information collected by our organization is accessible to specific categories of our staff and certain partner organizations, in order to provide our products and services effectively. For example:**

- **Customer service:** Accesses contact information to respond to requests.
- **IT department:** Accesses technical data for support and maintenance.
- **Marketing department:** Uses data for advertising campaigns and market research.
- **Payment service providers:** Access financial information to process transactions.
- **Personal information and data security officers:** Access information to ensure security and protect data from unauthorized access or cyberattacks.
- **Legal consultants:** Use data to ensure compliance with applicable laws and regulations.
- **Cloud service providers:** Host data on secure servers, enabling the storage and retrieval of information.
- **Research and development partners:** Access certain data to collaborate on new innovations or improvements to products/services.
- **Collection agencies:** In cases of payment default, certain information may be shared with external collection agencies.

We ensure that this information is used exclusively for the stated purposes and in accordance with confidentiality requirements. Data transfers outside Quebec are carried out as part of international collaborations, while ensuring adequate protection of information in accordance with applicable laws.

### **6. Links to other websites**

#### **6.1 Our website may contain links to third-party websites.**

When you follow these links, you leave our website. Information exchanged at that time is no longer subject to our privacy policy. We recommend that you review the privacy statements of any other websites you visit before providing any information.

### **7. Security of personal information**

## **7.1 Security measures for protecting personal information**

To ensure the security and confidentiality of personal information, Golf Le Versant Centre adopts rigorous security measures, including both physical and technological aspects. Here are some concrete examples:

- **Physical security:** Use of electronic locking systems and security locks for access to offices, cabinets and filing cabinets, installation of surveillance cameras, and restriction of access to areas where personal data is stored.
- **Access controls:** Limiting access to personal data to authorized employees only.
- **Staff training:** Regular staff awareness training on data security best practices.
- **Data encryption:** Protection of sensitive data using advanced encryption techniques.
- **Monitoring and intrusion detection:** Implementation of systems to monitor any suspicious activity and detect potential intrusions.
- **Disaster recovery plans:** Development of plans to quickly restore data in the event of an incident such as an outage or cyberattack.

These measures are designed to protect personal information against any unauthorized access, use or disclosure, and to maximize its integrity and confidentiality. Although we do everything we can to protect your personal data, it is important to keep in mind that no method of transmission over the Internet or electronic storage is 100% secure. We therefore cannot guarantee its absolute security.

## **7.2 Commitment of staff and the board of directors**

Every employee, director, volunteer, independent contractor or ad hoc advisor working within the committees of our board of directors commits to respecting the personal information we collect. In addition, these individuals commit to maintaining the confidentiality of information specific to our activities and not disclosing it or using it for personal benefit or the benefit of others. This commitment exists from the start of the employee's, director's, volunteer's, independent contractor's or ad hoc advisor's term and continues indefinitely.

## **8. Retention and destruction of personal information**

We will retain your personal data only for as long as necessary for the purposes set out in this privacy policy. We will retain and use it to the extent necessary to comply with our legal obligations, resolve disputes and enforce our legal policies.

We will also retain usage data for internal analysis purposes. This data is generally retained for a shorter period, unless it is used to enhance security or improve the functionality of our website, or unless we are legally required to retain it for a longer period.

## **9. Your rights**

### **9.1 Recognition and respect for your rights**

As part of our privacy policy, we recognize and respect the fundamental rights of individuals whose personal information we hold. These rights include:

- **Right of access:** Individuals have the right to consult the personal information we hold about them. For example, a client may request to see the data collected when registering for our service.
- **Right of rectification:** If information is inaccurate or incomplete, the individuals concerned may request that it be updated. For example, an employee may request that an incorrect mailing address be corrected in our records.
- **Right to de-indexing:** Individuals may request that their personal information be removed from circulation or that any hyperlink associated with their name be de-indexed, in cases where such circulation causes them harm or violates the law or a court order. This right to erasure, or the right to be forgotten,

allows individuals to control the availability of their personal information on the Internet.

- **Right to file a complaint:** If they have concerns about the processing of their data, individuals may file a complaint in accordance with our established process.

Subject to applicable laws, upon receipt of a written request from an individual and after verifying their identity, we will inform the individual whether we hold personal information about them and provide them with that information.

We may deny an individual access to their information in accordance with applicable laws, in which case we will provide reasons for the refusal.

To facilitate these rights, the contact information of our privacy officer is clearly indicated for any questions or concerns. These measures ensure that individuals can exercise their rights with confidence and transparency.

## **10. Changes to the policy**

This policy may be updated to reflect changes in our practices or legal requirements. Changes will be posted on our website. We encourage you to review this privacy policy regularly to stay informed of any changes.

## **11. Contact**

Any request or question regarding this privacy policy may be sent to the person responsible for the protection of personal information at the following address:

- **By email:** [dtheriault@golfleversant.com](mailto:dtheriault@golfleversant.com)
- **By mail:** 2075, Côte de Terrebonne, Terrebonne, QC, J6Y 1H6

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