

**PORTS ALIVE
PERSONAL INFORMATION PROTECTION POLICY
(EMPLOYEES AND PUBLIC)**

SCOPE OF THIS POLICY

This Personal Information Protection Policy sets out the principles which Ports Alive observes regarding the collection, use and disclosure of personal information about any identifiable person, including Ports Alive's employees, and members of the public who use Ports Alive's services and facilities

This Personal Information Protection Policy is subject to all applicable laws.

If personal information is made anonymous by removing details so that an individual is not identifiable to the user or recipient of that information, it is not governed by this Policy but will still be treated with appropriate safeguards.

DEFINITIONS

For the purposes of this Personal Information Protection Policy:

"Contact information" means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.

"Customers" and **"employees"** includes current, past and prospective customers and employees. This Policy is subject to all applicable laws; and

"Personal information" means any information about an identifiable individual, whether it was collected before or after this Policy was first published, including but not limited to the individual's name, address, age, gender, identification numbers, income, employment, assets, liabilities, credit card numbers, credit ratings, financial plans and other finance-related information. "Personal information" may also include an immigration status, travel or movement details, leisure activities, professional or trade union memberships, and licences and permits held. Personal information does not include contact information. With respect to any specific individual, Ports Alive may or may not have personal information within these enumerated categories.

PRINCIPLE 1 – PORTS ALIVE'S ACCOUNTABILITY

Ports Alive is responsible for all personal information under its control. The Ports Alive Privacy Officer (the "Privacy Officer") is accountable for Ports Alive's compliance with the principles described in this Policy, and may be contacted at:

The Privacy Officer,
Ports Alive
118 Garden Avenue
North Vancouver, B.C.
V7P 3H2
604.484.9096

Ports Alive has established and implemented: (a) procedures to protect personal information; (b) procedures to receive and respond to complaints and inquiries; (c) employee training and information programs to explain this Policy and related personal information protection procedures and practices; and (d) practices to ensure that clients and other individuals who contact Ports Alive have access to this Policy and to other literature explaining Ports Alive's related personal information protection practices and procedures.

PRINCIPLE 2 - THE PURPOSES FOR (AND THE MANNER IN WHICH) PORTS ALIVE MAY COLLECT, USE OR DISCLOSE PERSONAL INFORMATION

Subject to applicable law, Ports Alive will identify the purposes for which personal information is collected, used or disclosed before that information is collected, used or disclosed, as the case may be.

General Purposes

The general purposes for which Ports Alive may collect, use or disclose information concerning customers and members include the following: (a) to manage and promote Ports Alive's operations; (b) to better understand the needs of Ports Alive's customers and employees, to provide promotional and other information about Ports Alive and its business, and to respond to specific requests; (c) to fulfill requests for reservations, bookings or other arrangements with third parties; (d) to operate and fulfill contests; and; (e) to comply with legal and regulatory requirements.

Disclosure to Affiliates, Agencies and Service Providers

Ports Alive may transfer personal information to a third party for processing or to provide services, including third parties for whom Ports Alive acts as a booking or reservations agent, but uses contractual or other means to provide a comparable level of protection while the information is in the custody of that third party.

Changed Purposes

From time to time, Ports Alive may wish to use or disclose personal information for a purpose other than that for which it was initially collected. Ports Alive will ensure that personal information is not used or disclosed for that new purpose unless the individual is informed of the new purpose and gives his or her consent.

PRINCIPLE 3 - CONSENT

Subject to applicable legal exceptions, Ports Alive will make a reasonable effort to ensure that the individual is advised in advance of the purposes for which his or her personal information will be collected, used or disclosed, and that his or her consent to those activities is obtained. As required by applicable law, consent may be express or implied.

Ports Alive does not, as a condition of the supply of products or services require an individual to consent to the collection, use or disclosure of personal information beyond that required to fulfill Ports Alive's explicitly specified, and legitimate purposes.

An individual may withdraw his or her consent to collection, use or disclosure at any time, subject to legal or contractual restrictions and the provision of reasonable notice to Ports Alive. If an individual withdraws his or her consent to the collection, use or disclosure of personal information, he or she may be unable to be employed or access Ports Alive's products or services.

From time to time, Ports Alive may also collect information from external sources such as credit reporting agencies, credit grantors and income sources and personal references identified to Ports Alive for this purpose.

PRINCIPLE 4 - LIMITING COLLECTION

Ports Alive limits the amount and type of personal information collected to that which is necessary for the purposes identified by Ports Alive.

PRINCIPLE 5 - LIMITING USE, DISCLOSURE AND RETENTION

Ports Alive does not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information is retained only as long as necessary for the fulfillment of those purposes.

Personal information that has been used by Ports Alive to make a decision about an individual will be retained long enough to allow the individual access to the information after the decision has been made.

PRINCIPLE 6 - ACCURACY

Ports Alive aims to keep personal information as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. However, Ports Alive does not routinely update personal information, unless such updating is necessary to fulfill the purposes for which the information was collected.

Ports Alive generally relies upon individual customers and members to provide up-dated information, such as changes to addresses and other contact information, and changed financial information. If an individual successfully demonstrates to Ports Alive that personal information is inaccurate, incomplete, out of date, or irrelevant, Ports Alive will revise the personal information. If necessary, Ports Alive will disclose the revised personal information to third parties that were provided with the wrong information to permit them to revise their records as well.

PRINCIPLE 7 - SAFEGUARDS

Ports Alive has implemented appropriate security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. The nature of the safeguards vary depending on the sensitivity of the personal information that has been collected, the amount, distribution, and format of the information, and the method of storage. The more sensitive personal information is safeguarded at a higher level of protection.

The methods of protection employed by Ports Alive include: (a) physical measures, including locked filing cabinets and restricted access to offices; (b) organizational measures, such as security clearances and limiting access on a "need to know" basis; and (c) technological measures, such as the use of passwords and encryption.

Ports Alive takes care to inform employees about its policies and procedures for protecting personal information and emphasizes the importance of complying with them. Employees are required to conform to Ports Alive's policies and procedures concerning the security of personal information.

Ports Alive uses care in the disposal or destruction of personal information, to prevent unauthorized parties from gaining access to the information.

PRINCIPLE 8 - OPENNESS

Ports Alive strives to be open about its policies and procedures with respect to management of personal information. Ports Alive makes this information available in a form that is generally understandable. Copies of this Personal Information Protection Policy are by contacting the Privacy Officer.

PRINCIPLE 9 - INDIVIDUAL ACCESS

Upon an individual's request in writing, Ports Alive will inform that individual of the existence, use, and disclosure of his or her personal information and the individual will be given access to that information, except where the law requires or permits Ports Alive to deny access. Ports Alive may require the individual to provide sufficient information to permit Ports Alive to provide an account of the existence, use, and disclosure of personal information.

Ports Alive will respond diligently to a proper request and in any case not later than 30 days after receipt of the request, unless that time is extended according to applicable law. As permitted by applicable law, certain charges may be applicable in respect of certain requests.

PRINCIPLE 10 - CHALLENGING COMPLIANCE

Any individual may direct a challenge concerning compliance with this Personal Information Protection Policy to the Ports Alive Privacy Officer. Ports Alive has established procedures to receive and to respond to complaints or inquiries about Ports Alive's policies and practices relating to the handling of personal information.

Ports Alive investigates all complaints. If Ports Alive finds that a complaint is justified, Ports Alive will take appropriate measures, including, if necessary, amending its policies and practices.