

## Privacy Protection Policy

(Updated: 17-Dec-03)

In relation to our Privacy Policy, Bytown Travel means: Bytown Travel Ltd, Barrhaven Travel & Cruise Centre (a division of Bytown Travel Ltd). and Fallingbrook Travel & Cruise Centre (a division of Bytown Travel Ltd).

Bytown Travel has always been and will continue to be, committed to maintaining the accuracy, confidentiality, and security of your personal and financial information. In fact, it is one of our highest priorities and remains the cornerstone of our commitment to you.

We are committed to meeting or exceeding the privacy standards established by federal and provincial regulations and industry bodies. All of our information handling practices comply with federal and applicable provincial laws including the Personal Information Protection and Electronic Documents Act.

Our role in protecting an individual's privacy does not stop with this Act. We are continually looking for additional ways to ensure that the personal information we hold is secure and used in a responsible and respectful manner

As such, we have appointed a manager responsible for personal information whose role is to make sure that the personal information entrusted with us is secure and will not be used for purposes other than what is necessary to offer the service our clients deserve and have come to expect.

Should you have any questions, inquiries, concerns or complaints, please contact us by mail, telephone or via email, Attention: Privacy Manager

Mailing address: 469 Elgin Street  
Ottawa, Ontario K2P 2E6  
CANADA

Telephone: 1-613-238-6300 Toll-free: 1-800-567-4662

email: [privacy@bytowntravel.com](mailto:privacy@bytowntravel.com)

### Our Ten Privacy Principles

We fully support the new Canadian legislation, the *Personal Information Protection and Electronic Documents Act*, in its role to protect the privacy of the individual and adhere to the [Ten Privacy Principles](#) of fair information practices, which form ground rules for the collection, use and disclosure of personal information.

Bytown Travel invites you to review the principles, which have been built upon the values set by the Canadian Standards Association's *Model Code for the Protection of Personal Information* and Canada's *Personal Information Protection and Electronic Documents Act*.

#### **Principle 1 - Accountability**

Bytown Travel is responsible for maintaining and protecting the customer information under its control. In fulfilling this mandate, Bytown Travel has designated an individual who is accountable for our compliance with the Ten Privacy Principles.

#### **Principle 2 - Identifying Purposes**

The purposes for which customer information is collected shall be identified before or at the time the information is collected.

#### **Principle 3 - Consent**

The knowledge and consent of the customer are required for the collection, use or disclosure of customer information except where required or permitted by law.

#### **Principle 4 - Limiting Collection**

The customer information collected must be limited to those details necessary for the purposes identified by Bytown Travel. Information must be collected by fair and lawful means.

### ***Principle 5 - Limiting Use, Disclosure and Retention***

Customer information may only be used or disclosed for the purpose for which it was collected unless the customer has otherwise consented, or when it is required or permitted by law. Customer information may only be retained for the period of time required to fulfill the purpose for which it was collected.

### ***Principle 6 - Accuracy***

Customer information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

### ***Principle 7 - Safeguarding Customer Information***

Customer information must be protected by security safeguards that are appropriate to the sensitivity level of the information.

### ***Principle 8 - Openness***

Bytown Travel are required to make information available to customers concerning the policies and practices that apply to the management of their information.

### ***Principle 9 - Customer Access***

Upon request, a customer shall be informed of the existence, use and disclosure of their information, and shall be given access to it. Customers may verify the accuracy and completeness of their information, and may request that it be amended, if appropriate.

### ***Principle 10 - Handling Customer Complaints and Suggestions***

Customers may direct any questions or enquires with respect to the privacy principles outlined above or about our practices by contacting the designated person(s) accountable for privacy in each Bytown Travel Company.

## **What Types of Information Are Collected**

At Bytown Travel, we gather and use personal information to provide you with travel and travel-related 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, or when a third party books travel on your behalf such as a travel arranger or someone travelling with you, and only with your consent. The same principles apply to all our clients, including our business clients.

The types of information we may ask for depends on the nature of your travel request. Information that is essential for fulfilling most travel requests typically includes your name, address, e-mail address, phone number(s) and credit card information. In the case of travel to and from Canada, we will also require Passport, Nationality and Citizenship status to advise of entry and/or transit requirements that may be required. In the case of insurance products and services we offer, we may also collect age and health information about you where the law permits it. We may also request additional information to help us provide you with advice and information about other products and services that we believe would interest you.

All the information you provide to us is securely maintained and is kept strictly confidential.

## **Information collected about you**

Bytown Travel collects personal information about you that you specifically and voluntarily provide.

### ***Personal Information***

Personal information is information that refers to you specifically. With your consent, we may gather personal information from you in person, over the telephone, through a third party or by corresponding with you via mail or the Internet.

The type of information we usually collect and maintain in your customer file may include your:

- Name
- Address
- E-mail Address
- Telephone Number
- Date of Birth
- Place of Employment
- Passport information
- Nationality & Citizenship status
- Health Information
- Credit Card / Financial Institution Information
- Travel Supplier "Loyalty Program" information

For business customers, information may include:

- Business Name

- Business Address
- Business Telephone Number
- Name(s) of Owner(s), Officer(s) and Director(s)
- Industry Type
- Financial Information

The choice to provide us with personal and financial information is always yours. Your decision to withhold particular details may limit the services we are able to provide and make it more difficult for us to advise you or suggest appropriate alternatives.

If we are unable to accommodate your request based on the information that has been provided, we may ask for additional details in order to identify other ways to be of assistance.

### **When You Become Our Client**

When you first become a Bytown Travel customer and whenever you request subsequent travel and travel-related services, we let you know that:

- besides your name, address and telephone number, we need information to:
  - establish your identification
  - protect you and us from error and fraud
  - understand your needs and eligibility for products and services
  - recommend particular products and services to meet your needs
  - provide ongoing service
  - comply with legal requirements
- we may offer other products that are suitable to you

### *Travel Industry Advisories*

As a client of Bytown Travel, we feel it is part of our service commitment to you that we keep you informed of any important changes in the industry. Our Travel Industry Advisories could be sent by email, facsimile, phone or mail and will deal specifically and directly with important industry issues that may affect your current travel plans or have an affect on future travel. Our Travel Advisories are not scheduled direct marketing, rather information advisories relating to travel and will be sent to you as required.

As always, you have the choice to receive or opt-out of receiving our travel advisories. If you receive our Travel Advisory via email, you may unsubscribe from receiving these e-mails by following the unsubscribe instructions in any Travel Advisory e-mail you receive. You may also contact us to advise you do not wish to receive any further Travel Advisory information. Our contact information appears at the end of this Travel Policy.

### **Other Areas Where we Collect Information include:**

- Traveller profile information
- Third party travel arranger
- Participate in a survey, contest, or sweepstakes

### *Traveller Profile information*

We may also collect information about each traveller's preferences, including meal requests, seat selection, frequent flyer/hotel/car rental programs and membership numbers, and ticketing options. Traveller profile information, along with all other personal information, is stored securely in your customer file.

### *Third party travel arranger*

When someone other than yourself is booking travel on your behalf (third party travel arranger), you consent to the use of your personal information and travel preferences for the purpose of arranging and booking travel through a third party. The third party travel arranger(s) should have your consent prior to them providing your personal information to Bytown Travel.

### *Contests and Survey information*

Occasionally, Bytown Travel may offer our customers and website visitors an opportunity to participate in a contest or survey. Any information you provide on contest forms, questionnaires or surveys may be used by Bytown Travel to market vacation ideas, special rates for cruises, tours and airfares – plus enter-to-win competitions and more. By participating you are agreeing to this use of the information. You are under no obligation to respond or participate in any contest or survey. If you receive contest or survey information via email, you may unsubscribe from receiving these e-mails by following the unsubscribe instructions in any e-mail contest or survey you receive.

### ***Anonymous/Non-Personal Information***

At Bytown Travel, we occasionally collect anonymous/non-personal information. Anonymous/non-personal information is information that cannot be associated with or traced back to a specific individual or business entity. For example, our web servers collect some

anonymous/non-personal information automatically when you visit the Bytown Travel web site. Gathered electronically, this information may include the pages you visited, the type of web browser you are using, the level of encryption your browser supports and your Internet Protocol address. The anonymous/non-personal information collected may be used for research and analytical purposes. For example, we are able to determine how many times our online privacy policy has been visited but we do not know any specific information about those visitors.

To help us better understand our markets, we may also gather information for analytical purposes by conducting anonymous customer surveys, by extracting demographic information from existing files and from Statistics Canada.

### ***Accuracy and Maintenance of Your Information***

To ensure the information we have on file is up to date and accurate, we may, on a regular basis, use your personal information to contact you to verify the accuracy of the information. We will modify, add or delete information as you request and consent to.

### ***Retention & Destruction of Information***

Information we collect about you is retained at Bytown Travel and kept in secure electronic and/or paper customer files (see "How We Safeguard Your Information"). As a customer of Bytown Travel, our customer files, including your personal information and preferences, are retained for the purposes of providing travel and travel-related services to you from the first time you become one of our valued customers throughout our relationship with you. Having your current and updated information at hand in our secure electronic systems, ensures our accuracy and efficiency in processing your request for travel. When you or a third party travel arranger contact us to process your travel, and your personal information and preferences are not available in our system, we would require 1) your consent to collect and use your personal information and; 2) your personal information and preferences, each and every time you request travel services from us

You may, at any time, request all or any part thereof the information we have collected be removed from our systems and files. Electronic information is securely wiped from all electronic database files and all paper files are shredded by a bonded professional document shredding company.

## **How Your Information Is Used**

At Bytown Travel, we are obliged to keep your personal information confidential except under the following special circumstances:

- When Authorized by You
- When Required by Law
- When Permitted by Law

### ***When Authorized by You***

Your personal information will be used by us when asked to make arrangements for and book travel and travel-related services for you. For travel booked by a third party on your behalf, you consent to the use of your personal information and travel preferences for the purpose of arranging and booking travel through a third party.

### ***New Use of Personal Information***

Should Bytown Travel wish to use your personal information for a purpose not contemplated at the time of initial collection, such as additional services, suppliers, products, or promotional offers that may be of interest to you, we may use your contact information, including your email address, to ask for your consent to use your personal information for the new purpose.

### ***When Required by Law***

In some instances such as a legal proceeding or court order, we may be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities who are making the request have legitimate grounds to do so.

### ***When Permitted by Law***

There are some situations where we are legally permitted to disclose personal information such as returning a cheque due to insufficient funds, employing reasonable and legal methods to collect a delinquent account, a medical emergency or suspicion of illegal activities.

## **With Whom We May Share Your Information**

Unless you authorize us to release it, or release is required or permitted by law, we never sell, lease or trade information about you to other parties.

Bytown Travel, our employees and service suppliers are all governed by strict standards and policies to ensure your information is secure and treated with the utmost care and respect.

At Bytown Travel, client information is strictly confidential. With your consent, we will share information with suppliers who perform services on our behalf.

### ***Our Employees***

In the course of daily operations, access to private, sensitive and confidential information is restricted to authorized employees who have a legitimate business purpose and reason for accessing it.

As a condition of their employment, all employees of Bytown Travel are required to abide by the privacy standards we have established. They are also required to work within the principles of ethical behavior as set out in our internal Employee Rules and must follow all applicable laws and regulations. To reinforce their understanding and commitment to upholding client privacy and confidentiality, employees periodically receive up-to-date literature about our privacy policies, principles and standards.

### ***Service Providers***

To provide and process the travel services you request, Bytown Travel shares your information with our authorized service providers that perform certain services or functions on our behalf. We only share information about travel either reserved or purchased through Bytown Travel. Our service providers need information about you to process and confirm your travel reservation. We will disclose only the required information about you to make the necessary arrangements to hotel, airline, rental car and/or other travel suppliers whose products you have purchased. Like any other travel agent, this information must be shared with our travel suppliers to confirm your reservation and travel preferences.

Bytown Travel prefers to use travel suppliers who adhere to the same privacy and general business standards as we do and we try our best to ensure they continue to meet our high standards. Although Bytown Travel offers worldwide travel products from hotel, airline, rental car and other travel suppliers that are reputable companies, we have not placed limitations on these suppliers from using or disclosing your information without your permission. Therefore, we encourage you to review the information privacy practices of any travel suppliers whose products you purchase from Bytown Travel. In addition, these travel suppliers may also contact you as necessary to obtain additional information about your confirmed reservation.

Bytown Travel will occasionally share aggregated information with our service providers. This information does not contain any personal information and is used to develop services, programs and information content that will be of interest to our customers and website visitors.

In the event that you make a new, or update an existing travel reservation by calling our 24-hour Traveller's Emergency Service bureau, your information may be accessed by a third-party service provider, as necessary, to respond to your request for customer service and/or make the required travel arrangements or changes.

Bytown Travel may contract a reputable third party to facilitate the distribution of survey, promotion, or contest programs. Upon completion of these projects, all information is returned to Bytown Travel.

### ***Our obligations***

Bytown Travel may be required by law to disclose information you have provided in obtaining our travel products or services. Bytown Travel may also disclose information against someone who poses a threat to Bytown Travel's interests (such as customer fraud) or whose activities could bring harm to others. In addition, it may be necessary for Bytown Travel to provide customer information to third parties, such as credit card companies, for the purpose of resolving disputes that arise in the normal course of business.

### ***Other Web sites***

There are several places throughout the Bytown Travel web site that offer links to other web sites that do not operate under Bytown Travel's information privacy practices. When you click through to these web sites, Bytown Travel's information privacy practices no longer apply. We recommend that you examine the privacy statements for all third-party web sites to understand their procedures for collecting, using, and disclosing your information.

## **How We Safeguard Your Information**

At Bytown Travel, we use state-of-the-art technologies and maintain current security standards to ensure that your personal and financial information is protected against unauthorized access, disclosure, inappropriate alteration or misuse. All safety and security measures are also appropriate to the sensitivity level of your information.

### ***Client Files***

Electronic client files are kept in a highly secured environment with restricted multi-level access. Paper-based files are stored in locked fire-resistant filing cabinets. Access is also highly restricted.

### ***Online Security***

We manage our server environment appropriately and our firewall infrastructure is strictly adhered to. Our security practices are reviewed on a regular basis and we routinely employ current technologies to ensure that the confidentiality and privacy of your information is not compromised.

**NOTE:** No data transmission over the Internet can be guaranteed to be 100% secure.  
We cannot ensure the security of the information you transmit to us over the Internet.

### Business Client Sub-Sites

Bytown Travel Web sub-sites use Secure Socket Layer (SSL) and 128 bit encryption technologies to enhance security when you visit the secured areas of our web site (business client sub-sites). SSL is the industry standard tool for protecting and maintaining the security of message transmissions over the Internet. When you access our secure web pages or send information from secured sites, encryption will scramble your data into an unreadable format to inhibit unauthorized access by others.

To safeguard against unauthorized access to our business client sub-sites, you are required to 'log-on' using an encrypted username and password to access certain secured areas of Bytown Travel web sites. If you are unable to provide the correct password, you will not be able to access these sections.

Your password information is encrypted which is presently the most effective way to secure data. To protect your online activity, the systems are designed to automatically terminate if extended inactivity is detected. If your session is terminated, you will be required to sign-on again to continue browsing.

## **Questions, Concerns & Complaints**

If you have a question, concern or complaint about privacy, confidentiality or the information handling practices of Bytown Travel, our employees or service suppliers, please contact us by mail, telephone or via email;

Please address all correspondence:	Attention: Privacy Manager
Mailing address:	469 Elgin Street Ottawa, Ontario K2P 2E6 CANADA
Telephone:	1-613-238-6300 Toll-free: 1-800-567-4662
email:	privacy@bytowntravel.com

## **Updating This Policy**

Any changes to our privacy policy and information handling practices shall be acknowledged in this policy in a timely manner. We may add, modify or remove portions of this policy when we feel it is appropriate to do so. You may determine when this policy was last updated by referring to the modification date found at the top of our Privacy Policy document or our Travel Policy web page.