

Privacy Policy

The Royal Agricultural Winter Fair ("RAWF") is committed to protecting the privacy and confidentiality of the Personal Information (defined below) of our clients, employees and third parties with which it deals. This privacy policy outlines the RAWF's information-handling practices and the various procedures in place to ensure that Personal Information is managed in accordance with the *Personal Information Protection and Electronic Documents Act* (Canada) and other applicable privacy laws

The RAWF needs to collect, use and disclose certain types of Personal Information in the course of its operations. For the purposes of this Policy, the term "Personal Information" generally refers to any information, regardless of the format in which it resides, that may reasonably lead to the identification of a specific individual.

The RAWF may also collect non-identifiable, aggregated data in order to compile broad demographic information that cannot and will not be used to specifically identify any individuals ("Aggregate Data"). Where information is deemed to be Aggregate Data, it shall not be subject to the terms and conditions contained in this Policy.

Collection and Consent

The RAWF collects information using fair and lawful means and only requests those items of Personal Information necessary for its operations. From time to time, it may be reasonably necessary for the RAWF to obtain information about an individual from other sources.

From time to time, the RAWF may use Personal Information in order to distribute information to clients and others generally with respect to its operations and products. If at any time an individual expresses to the RAWF that he or she no longer wishes to receive this type of information, the RAWF will cease using that individual's Personal Information for these purposes. To withdraw consent, an individual may contact the Chief Privacy Officer.

Unless permitted by law, the RAWF will not collect Personal Information without first obtaining the consent of the individual to whom the information pertains. In most cases, the RAWF will ask that the individual specifically consent to the collection, use and disclosure of Personal Information for specific, identified purposes; however, sometimes the RAWF may reasonably imply an individual's consent through their conduct in dealing with or working for the RAWF. Additionally, there are instances where proceeding without the express consent of an individual is justified or permissible, such as:

- Where required by law, administrative agency or other governmental institution

- Where it is reasonably necessary to protect the safety, property, interests or other rights of an individual or identifiable group of individuals
- Where circumstances have given rise to a right of action for the RAWF to pursue its available remedies, e.g., to collect amounts owing to the RAWF, or to establish or limit liability

Use and Disclosure

Except when otherwise permitted by law, the RAWF will use Personal Information for the purposes identified to the affected party. The RAWF uses may include advising clients of the promotional events available through the RAWF, administration, billing, accounting and collection issues related to a client's account with the RAWF. When Personal Information is to be used for a purpose not identified, the RAWF will take all reasonable steps to ensure that new purpose is identified prior to use.

The RAWF may need to disclose certain items of Personal Information to third parties in relation to its operations. Third party disclosure may occur in any of the following circumstances:

- with the prior consent of the individual
- when the RAWF is required or authorized by law to do so, for example, pursuant to a court order

In the event that the RAWF or any of its assets are acquired by a third party, or the RAWF merges with another entity, Personal Information held by the RAWF may be a transferred asset. Any acquiring entity will be required to adhere to and observe the terms and conditions under which such Personal Information was collected.

Accuracy

The RAWF strives to ensure that Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is used. A change in Personal Information should be reported as soon as possible, particularly with respect to employees and contractors of the RAWF

Access

An individual may contact the RAWF's Privacy Officer to review their Personal Information held by RAWF. Corrections or amendments to Personal Information will be permitted. The RAWF has the right to refuse a request for access to Personal Information if:

- the disclosure would reveal Personal Information about someone else, unless that information can be redacted;

- the information is protected by solicitor-client privilege;
- disclosure would reveal confidential commercial information;
- the information was collected for purposes related to an investigation of a breach of an agreement or contravention of the law;
- the information was generated in the course of a formal dispute-resolution process; or
- the disclosure may reasonably be expected to threaten the life or security of another individual.

Security and Retention

The RAWF employs reasonable safeguarding measures to uphold the security and privacy of Personal Information in its custody and control, regardless of the format in which it resides. The RAWF has instituted policies and procedures to protect against unauthorized use or access, alteration, duplication, destruction, disclosure or loss or theft of such Personal Information. While the RAWF endeavors to protect Personal Information as thoroughly as possible while maintaining the ability to operate efficiently, please be advised that no method of storing or transmitting electronic information is absolutely secure. If, in the RAWF's reasonable estimation, certain types of Personal Information warrant particular protection due to their sensitivity, the RAWF will take steps to ensure that such information is accorded a heightened degree of protection, where possible.

Changes

This Policy may be revised from time to time to reflect changes to the RAWF's internal policies and procedures or to applicable privacy laws. In the event there is an amendment to this Policy, the RAWF will post a notice on its website advising of the change. The statements set forth Policy, and any future amendments hereto, apply to all Personal Information in the custody and control of the RAWF, whether collected prior to or following the implementation of this Policy.

All assurances made under this Policy and the administration of our internal privacy procedures are the responsibility of the RAWF's Privacy Officer. Questions about this Policy should be directed to the Privacy Officer using the contact information set out above.

Website

The RAWF's website may contain links to third party sites, which are not governed by this Policy. Further, the RAWF may monitor traffic patterns, site usage and related site information in order to optimize web service. Aggregate Data relating to the website may be provided to third parties.

Contact Information for Privacy Officer

Royal Agricultural Winter Fair

Attn: Privacy Officer

Ricoh Coliseum, Direct Energy Centre, Exhibition Place

100 Princes' Boulevard

Toronto, Ontario, M6K 3C3

Email: privacyofficer@royalfair.org

Tel: 416 263-3400