

## Privacy Policy

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#### **1. Who are we?**

Head-line Mountain Holidays and Club is a provider and coordinator of adventure activities and luxury adventure related experiences. Head-line Mountain Holidays and Club (HMH) company focuses on the web, print and E-Commerce sectors of the luxury adventure travel industry. Rapidly becoming one of the most renowned providers for this type of product in the province of BC and extending beyond into other areas of Canada. Through its direct marketing facilities, HMH has the platform and complete service offering needed to cover the entire North American market. HMH is also involved in adventure education product development, training and other adventure related activities. In addition, it is engaged in the integration of Web solutions, and the electronic aggregation of products, news and tourism related information.

This Privacy Policy applies to our collection, use and disclosure of personal information regarding the clients and consumers of our products and services, including our online and print publications.

#### **2. What personal information do we collect?**

Canadian privacy legislation defines personal information broadly as information about "an identifiable individual" or as information that allows an individual to be identified. The types of personal information that we may collect from you from time to time include: your name, address, telephone number, e-mail address, your forwarding address (e.g. during a vacation), previous address(es), payment information (for billing purposes), your mailing preferences such as delivery instructions, and individual customer service preferences (such as "do not solicit"). In addition, from time to time, we may ask you to provide us with more detailed information regarding your interests, occupation, and background. For example, we sometimes ask our customers to complete surveys in order to get a better sense of who they are and what issues, products or services may be of interest to them and our readership. Finally, from time to time, we may acquire demographic and other information about you (e.g. your occupation and interests) from an outside organization, but only if you have previously agreed to allow such an organization to disclose the information to companies such as Head-line Mountain Holidays and Club.

### 3. Why do we collect your personal information?

We collect your personal information for the purposes listed below:

(a) **To provide the product, service or information you requested**

If you are a customer of one of our services, we use your name and address (postal and/or e-mail) in order to deliver the product, service or information you requested and to follow up with you about the transaction (i.e., send a bill, notify you that your subscription is expiring, etc.). If you enter into a contest offered through one of our websites or printed publications, we use your personal information to administer the contest on our own behalf or on behalf of our sponsors.

**(b) To process payment**

Your credit card number, debit card number, or banking information for pre-authorized payments is used only for processing payments and for presenting you with payment options - not for marketing purposes.

**(c) To send you information**

From time to time we may send you further information about the Adventure sector and Club sector, its offers, or other products produced under or in connection with HMM.

(b) **(d) Other purposes**

In addition, from time to time, we may use your personal information for the following purposes:

- to detect and protect HMM and other third parties against error, fraud, theft and other illegal activity, and to audit compliance with HMM policies and contractual obligations;
- to understand your needs and preferences, including to contact and communicate with you and to conduct surveys, research and evaluations;
- for any other purpose we may indicate to you from time to time.

### 4. To whom do we disclose your personal information?

We may disclose your personal information to the following third parties in the following circumstances:

• **(a) Disclosure to Service Providers**

We may disclose your personal information to other companies that provide services on our behalf, including label printers, invoice printers, fulfillment contractors, auditors, our software developers (including website developers and hosts), data processing, document management and office services. In addition, we may disclose your personal information to an organization or individual retained by HMM to evaluate your creditworthiness or to collect debts outstanding on an account or to our auditors. We will only provide those companies the information they need to deliver the service and they are prohibited from using that information for any other purpose.

• **(b) Disclosure to Affiliates and Business Units**

We may disclose your personal information to any of the companies and business units that form part of the HMM group (i.e. amongst its subsidiaries and affiliates) in order to serve you better and to provide you with information about our group's products and services.

- **(c) Disclosure to Trading Partners**  
From time to time our websites may make their list of customers available to other carefully screened organizations (such as other related tourism, accommodation or adventure products suppliers) that want to let you know about a product or service that might interest you. The material to be sent to you is reviewed by us before the names and addresses (including e-mail addresses) are released to ensure the organization is reputable and material is appropriate and not misleading.
- **(d) Disclosure in Business Transfers**  
HMH may be involved in the sale or transfer of some or all of its business. As part of that sale or transfer, HMH may disclose your personal information to the acquiring organization, but will require the acquiring organization to agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy.
- **(e) Law Enforcement and Legal Disclosure**  
Transcontinental may disclose your personal information to a government institution that has asserted its lawful authority to obtain the information or where HMH has reasonable grounds to believe the information could be useful in the investigation of unlawful activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with court rules regarding the production of records and information, or to HMH's legal counsel.

If you would prefer for us NOT to share your information as described above in sections 4(a)-4(d), simply inform us.

## 5. Control of your personal information

At HMH, we want you to be able to maintain control over how we use your personal information. In particular:

- You may have the right to "opt out" of some or all of the identified purposes, uses and disclosures listed in sections 3 and 4 above.
- You always have the option to instruct us not to use your name, address, e-mail address, etc. beyond providing you with the product, service or information you requested. See contact us below.
- E-mail communications will always include an identification of the sender and an "Unsubscribe" option.
- If you receive a mailing from any of our consumer affiliates and you wish to know the source of your name (i.e. what list it came from), we will make every reasonable effort to determine the source and provide you with the information. For this request, or to confirm that any personal information we may have is correct, please contact us (See "[Contact Us](#)" below).

## 6. Where is your personal information stored?

Your personal information is stored in secured locations and on servers controlled by \_\_\_\_\_ located either at our offices or at the offices of our service providers. For access to your personal information, please contact our Privacy Officer using the "[Contact Us](#)" section below.

## 7. How can you access your personal information?

Upon written request, subject to certain exceptions, HMH will inform you of the existence, use, and disclosure of your personal information and will give you access to that

information. Access requests should be sent to our Privacy Officer, using the contact information in the "[Contact Us](#)" section below.

### **8. How do we protect your personal information?**

We make every reasonable effort to protect against the loss, misuse, and alteration of personal information under our control. Our security policies are periodically reviewed and enhanced as necessary.

Only authorized employees and suppliers have access to your personal information. Where information is sent to a third party for processing, we make sure, through our contracts with them, that all your information is kept secure. We keep your information for the time we are providing you with a product or service, and for a reasonable time thereafter in the event that you wish to resume service.

We operate secure data networks protected by industry standard firewall and password protection systems. Credit card information is processed using industry-standard encryption and security. We do not collect personal information from bulletin boards or forums. However, we cannot guarantee that personal information voluntarily disclosed in chat rooms or discussion boards will not be collected and used by others, which may result in unsolicited messages to you from other parties.

### **9. Privacy and our websites**

HMH sometimes collects personal information through its various affiliate and websites. In this section, we provide you with additional information regarding such collection.

**Cookies** - When an individual visitor accesses the HMH affiliated websites, we may use a browser feature called a "cookie" to collect information such as the type of Internet browser and operating system the visitor uses, the domain name of the websites from which the visitor came, date and duration of the visit, number of visits, average time spent on our websites, pages viewed and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies the visitor's browser, but not necessarily the visitor, to our computers each time our websites are visited. Unless a visitor specifically informs us (e.g. by enrolling for our services or sending us correspondence from the websites), we will not know who the individual visitors are. In addition to the identified purposes described in our Privacy Policy, we may use this website information and share it with other organizations with whom we have a commercial relationship to measure the use of our websites and to improve the functionality and content of the websites. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on our websites.

**Online Communications** - In order to provide our website visitors with a product, service or information, visitors may voluntarily submit personal information to us for purposes such as asking a question, obtaining information, subscribing to, reviewing or downloading a publication, participating in contests and surveys. If you are known to HMH as a registered user of an online service, we may combine and store personal information about your use of our websites and the online information you have provided with certain other online and offline information we may have collected.

**E-Mail Communications** - Occasionally, we may send marketing or promotional e-mail communications to you with information that may be useful, including information about the products and services of HMH and other third parties with whom we have a relationship. We will include instructions on how to unsubscribe and inform us of preferences if recipients decide they do not want to receive any future marketing or promotional e-mails from HMH.

Also, if you send us an email message, we may retain that message and your email address, as well as any response we send you.

**Advertisers** - If you submit some of your personal information on any affiliated HMH website to request information from a third party (such as an advertiser), we are not responsible for any use of your personal information by such third party. Hence, we suggest that you first learn more about such third party's privacy policies prior to submitting your personal information by visiting its website or contacting it directly.

**Opinion Polls** - Opinion polls on our websites are anonymous. We do not correlate votes submitted via such polls with names or individual email addresses, unless otherwise disclosed at the point of collection.

**Chat Rooms and Bulletin Boards** - Some of HMH websites offer chat rooms, forums, blogs and bulletin boards. Only individuals 18 years of age or older may participate in these services. The voluntary disclosure of personal information in a chat room or on a bulletin board, blog or forum is not governed by this Privacy Policy. Any communications which are part of chat rooms or discussion boards, blogs or forums are public and not private and you provide such information at your own risk. Although it is prohibited to use our forums as a source of email addresses for sending unfounded or unsolicited messages or spamming, others may still capture your email address and send you email messages if you post your email address and we cannot control such actions by others. We advise you to remain prudent and attentive at all times when you are on line on the Internet.

**Searches** - For your convenience, search functions are sometimes provided on our websites. We keep logs of the words searched to learn more about what kind of information our visitors are seeking, and thus improve our services.

**Hyperlinks** - For your convenience, HMH and affiliated websites sometimes contain hyperlinks to websites managed by third parties. By activating these hyperlinks, you will leave HMH websites for those of the third parties, which may have different privacy policies and practices than HMH. HMH cannot be held liable for the use of such third party websites.

**Advertising to Children** - We believe that none of HMH's websites appeal directly to children of 13 years old or less. We do not knowingly direct our advertising at children under the age of 13, except as permitted by law.

**Individuals Under 19** - No personal information should be submitted or posted on our websites by individuals under 19 years of age without their parent's or guardian's permission. We may request name, address, phone number, email address and date of birth from an individual under 19 years of age for contest participation so that we may notify him or her if selected as a winner. In the event we do so, we will request their parent's or guardian's consent prior to collection.

No information collected from online guests under 19 years of age is used for any marketing or promotional purposes whatsoever by HMH. Unless otherwise disclosed at collection, we do not provide any personal information collected through any HMH website from individuals under 19 years old, regardless of its source, to any third party for any purpose whatsoever.

## **10. Changes to the Privacy Policy**

HMH reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such change on our websites and make such revised policy and change available upon request to the HMH Privacy Officer. However, HMH

will obtain the necessary consents required under applicable Privacy Laws if it seeks to collect, use or disclose an individual's personal information for purposes other than those to which consent is obtained unless otherwise required or permitted by law.

## Appendix 1

What are "fair information practices"?

In Canada, "fair information practices" with regards to your personal information are reflected in a series of principles developed by the Canadian Standards Association and incorporated into Canadian privacy legislation, designed to ensure that companies treat your personal information fairly, protect its confidentiality and provide the means by which individuals can maintain a reasonable level of control over how their personal information is collected, used and disclosed. HMM collects, uses and discloses your personal information by employing "fair information practices" as described in the following ten privacy principles:

### **Principle 1 - Accountability**

HMM is responsible for personal information under its control and is accountable for this Privacy Policy and the Privacy Laws. Contact information for HMM is provided in the [Contact Us](#) section of this Privacy Policy. In addition, our accountability for the personal information we collect continues even if we disclose it to other organizations. For example, whenever we disclose your information to another organization (such as to one of our service providers), we will put in place contractual and other safeguards to help ensure that they appropriately protect your personal information.

### **Principle 2 - Identifying the Purposes for Collection of Personal Information**

HMM will identify the purposes for which your personal information is collected at or before the time the personal information is collected. Some of the identified purposes for which HMM typically collects, uses and discloses personal information are described in Section 3 of this Privacy Policy. If we intend to collect, use or disclose your personal information for additional purposes, we will either revise this Privacy Policy (and provide you with notice) or seek your consent.

### **Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information**

We will obtain your informed consent for the collection, use, or disclosure of your personal information, except as permitted by law. For example, we ask that you provide us with your consent to collect, use and disclose your personal information for the purposes described in Section 3 of this Privacy Policy. You may withdraw consent at any time to some or all of the purposes indicated, subject to legal or contractual restrictions and reasonable notice. Please note, however, that in some circumstances, we may not be able to provide you with our services if you withdraw your consent to our use of your personal information.

### **Principle 4 - Limiting Collection of Personal Information**

HMM will limit the collection of personal information, both the amount and the type of information, to that which is necessary for the purposes identified by HMM. In addition, HMM will collect your personal information by fair and lawful means, and not by misleading or deceiving you about the purpose for which information is being collected.

### **Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information**

HMM will not use or disclose personal information for purposes other than the identified purposes for which it was collected, except with your consent or as required or permitted by law. HMM will retain your personal information only as long as necessary to fulfil the identified purposes.

**Principle 6 - Accuracy of Personal Information**

HMH will endeavour to ensure that your personal information will be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used. HMH will update personal information as and when necessary to fulfill the identified purposes or upon notification from the subject individual. HMH will not routinely update personal information, unless such process is necessary to fulfill the identified purposes. If ever your contact and/or other personal information changes, please feel free to contact us, so that we can update our records.

**Principle 7 - Security Safeguards**

HMH will protect your personal information by security safeguards appropriate to the sensitivity of the information. For example, the computer servers on which we store your personal information are protected by firewalls and other industry standard security features. In addition, your personal information is only made available to our employees and service providers who have a "need to know" in order to offer you our services or otherwise fulfil the purposes identified in Section 3 above.

**Principle 8 - Openness Concerning Policies and Practices**

HMH will make readily available to you specific information about our policies and practices relating to the management of personal information. For example, the most recent version of this Privacy Policy will always be available on the HMH website at [Privacy Policy](#) and upon request using the contact information in the "[Contact Us](#)" section.

**Principle 9 - Individual Access to Personal Information**

Upon written request, subject to certain exceptions, HMH will inform you of the existence, use, and disclosure of your personal information and will give you access to that information. If access is denied, HMH will notify you in writing, give reasons for the denial, and inform you of the recourses open to you. If access is granted, HMH will give you a reasonable opportunity to review your personal information. You will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

**Principle 10 - Challenging Compliance**

You have the right to address a challenge concerning compliance with this Privacy Policy to HMH at [Contact Us](#) "