

# PRIVACY POLICY

## Tremblant International Blues Festival's ten privacy principles

1. Principle 1 - Accountability
2. Principle 2 - Identifying Purposes for Collection of Personal Information
3. Principle 3 - Consent
4. Principle 4 - Limiting Collection of Personal Information
5. Principle 5 - Limiting Use, Disclosure or Retention of Personal Information
6. Principle 6 - Accuracy
7. Principle 7 - Security Safeguards
8. Principle 8 - Openness
9. Principle 9 - Individual Access
10. Principle 10 - Handling Inquiries and Challenges

---

### SCOPE AND APPLICATION

This Privacy Policy contains ten principles that are observed by Tremblant International Blues Festival regarding the collection, use and disclosure of personal information. Each principle must be read in conjunction with the accompanying commentary. The commentary in the Tremblant International Blues Festival Privacy Policy has been tailored to reflect personal information issues specific to Tremblant International Blues Festival. The scope and application of the Tremblant International Blues Festival Privacy Policy are as follows:

- The Policy applies to personal information about Tremblant International Blues Festival's customers and other individuals that is collected, used or disclosed by Tremblant International Blues Festival.
- This Policy is subject to change, and may be supplemented or modified by additional terms applicable between Tremblant International Blues Festival and an individual.

### DEFINITIONS

**Collection** - the act of gathering, acquiring, recording, or obtaining personal information.

**Consent** - voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express, implied or deemed, and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. Deemed consent is consent that is deemed to be given pursuant to applicable legislation or other regulations.

**Disclosure** - making personal information available to a third party.

**Personal information** - information about an identifiable individual, but does not include aggregated information that cannot be associated with a specific individual. Personal information also excludes certain information as is excluded pursuant to applicable

legislation or other regulations, such as publicly available information or business contact information, as and when applicable.

**Third party** - an individual or organization outside Tremblant International Blues Festival.

**Use** - the treatment, handling and management of personal information by and within an organization.

---

### **Principle 1 - Accountability**

Tremblant International Blues Festival is responsible for personal information under its control and shall designate one or more persons who are accountable for Tremblant International Blues Festival's compliance with the following principles.

**1.1** Tremblant International Blues Festival is responsible for personal information in its possession or under its control. Tremblant International Blues Festival shall use appropriate means to protect personal information while information is being processed by a third party on behalf of Tremblant International Blues Festival (see Principle 7).

---

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

Tremblant International Blues Festival shall identify and document the purposes for which personal information is collected at or before the time the personal information is collected or, when appropriate, at or before the time the personal information is used for a new purpose.

**2.1** Tremblant International Blues Festival collects personal information for the following purposes:

- a) to establish and maintain a responsible commercial relationship with customers;
- b) for purposes identified to individuals or purposes obvious to individuals, in respect of particular collections of personal information;
- c) to meet legal and regulatory requirements;
- d) to understand needs and preferences of individuals;
- e) to develop, enhance, market and/or provide products and services;
- f) to manage and develop Tremblant International Blues Festival's business and operations, including transfer of data among affiliated entities.

Further references to "identified purposes" mean the purposes identified in this Principle.

**2.2** Tremblant International Blues Festival shall, as appropriate, specify orally, electronically or in writing the identified purposes to the individual at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within Tremblant International Blues Festival who shall explain the purposes.

---

### **Principle 3 - Consent**

The knowledge and consent of an individual are generally required for the collection, use or disclosure of personal information. In certain circumstances personal information can be

collected, used or disclosed without the knowledge and consent of the individual, such as in the case of an emergency where the life, health or security of an individual is threatened. Tremblant International Blues Festival may disclose personal information without knowledge or consent to a lawyer or other advisor representing Tremblant International Blues Festival, to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law.

**3.1** In obtaining consent, Tremblant International Blues Festival shall use reasonable efforts to ensure that an individual is advised of the identified purposes for which personal information will be used or disclosed. Purposes shall be stated in a manner that can be reasonably understood by the individual.

**3.2** Generally, Tremblant International Blues Festival shall seek consent to use and disclose personal information at the same time it collects the information. However, Tremblant International Blues Festival may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.

**3.3** Tremblant International Blues Festival will require individuals to consent to the collection, use or disclosure of personal information as a condition of the supply of a product or service only if such collection, use or disclosure is reasonably required to fulfill the identified purposes.

**3.4** In determining the appropriate form of consent, Tremblant International Blues Festival shall take into account the sensitivity of the personal information and the reasonable expectations of an individual.

**3.5** Where consent is required for a particular use or disclosure, an individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Individuals may contact Tremblant International Blues Festival for more information regarding the implications of withdrawing consent.

---

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

Tremblant International Blues Festival shall limit the collection of personal information to that which is necessary for the purposes identified by Tremblant International Blues Festival and as permitted by law.

**4.1** Tremblant International Blues Festival collects personal information primarily from the individual to whom the information relates.

**4.2** Tremblant International Blues Festival may also collect personal information from other sources including credit bureaus or other third parties who represent that they have the right to disclose the information, or as otherwise permitted by law.

---

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

Tremblant International Blues Festival shall 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 by law. Tremblant International Blues Festival shall retain personal information only as long as necessary for the fulfillment of those purposes or as required or permitted by law.

**5.1** Tremblant International Blues Festival may disclose an individual's personal information to:

- a) a person who in the reasonable judgment of Tremblant International Blues Festival is seeking the information as an agent of the individual;

- b) a company or individual employed by Tremblant International Blues Festival to perform functions on its behalf, such as but not limited to research or data processing;
- c) another company or individual for the development, enhancement, marketing or provision of any of Tremblant International Blues Festival 's products and services;
- d) an agent used by Tremblant International Blues Festival to evaluate the individual's creditworthiness or to collect the individual's account;
- e) a credit reporting agency;
- f) a public authority or agent of a public authority, if in the reasonable judgment of Tremblant International Blues Festival, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information;
- g) another entity as part of a merger, a sale of assets or all or part of a business, or any other corporate change or re-organization;
- h) a third party or parties, where the individual consents to such disclosure or disclosure is required or permitted by law.

**5.2** Only Tremblant International Blues Festival employees with a business need to know, or whose duties reasonably so require, are granted access to personal information about individuals.

**5.3** Depending on the circumstances, where personal information has been used to make a decision about an individual, Tremblant International Blues Festival shall retain, for a reasonable period of time, either the actual information or the rationale for making the decision.

**5.4** Tremblant International Blues Festival shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required or permitted by law to be retained. Such information shall be destroyed, erased or made anonymous.

**5.5** Where appropriate, Tremblant International Blues Festival may communicate updates of personal information to third parties.

**5.6** Tremblant International Blues Festival may engage affiliates or third party service providers for the purpose of providing services or processing information on behalf of Tremblant International Blues Festival, and we may transfer or disclose personal information to such parties in connection with such purposes. Some divisions, affiliates or third party service providers may be located in other jurisdictions, and information in their custody (i) may or may not be subject to privacy legislation similar to that applicable to Tremblant International Blues Festival, and (ii) may be subject to laws applicable in such jurisdictions that permit access to such information by foreign governments or law enforcement agencies or by others.

---

## **Principle 6 - Accuracy**

Tremblant International Blues Festival shall take steps to ensure that personal information is as accurate, complete and up-to-date as is appropriate for its purposes.

**6.1** Personal information used by Tremblant International Blues Festival shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about an individual.

**6.2** Tremblant International Blues Festival shall take all reasonable steps to update personal information about individuals as and when reasonably necessary to fulfill the identified purposes or as reasonably requested by the individual.

---

## **Principle 7 - Security Safeguards**

Tremblant International Blues Festival shall protect personal information by security safeguards appropriate to the sensitivity of the information.

**7.1** Tremblant International Blues Festival shall take appropriate and reasonable steps to protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction.

**7.2** Tremblant International Blues Festival shall take appropriate and reasonable steps to protect personal information disclosed to third parties, for example by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

---

## **Principle 8 - Openness**

Tremblant International Blues Festival shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

**8.1** Copies of the Policy will be made available upon request.

**8.2** Tremblant International Blues Festival shall make information about its policies and procedures easy to understand, including:

- a) the title and addresses of the person or persons accountable for Tremblant International Blues Festival 's compliance with the Policy and to whom inquiries or complaints can be forwarded;
  - b) the means of gaining access to personal information held by Tremblant International Blues Festival; and
  - c) a description of the type of personal information held by Tremblant International Blues Festival, including a general account of its use.
- 

## **Principle 9 - Individual Access**

Upon request, Tremblant International Blues Festival shall inform an individual of the existence, use and disclosure of his or her personal information, at a minimal or no cost to the individual. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

**9.1** In certain situations, Tremblant International Blues Festival may not be able to provide access to all the personal information that it holds about an individual. For example, Tremblant International Blues Festival may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of an individual. Also, Tremblant International Blues Festival may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a law. If access to personal information cannot be provided, Tremblant International Blues Festival shall, upon request, provide the reasons for denying access.

**9.2** In order to safeguard personal information, an individual may be required to provide sufficient identification information to permit Tremblant International Blues Festival to authorize access to the individual's file.

**9.3** Tremblant International Blues Festival will endeavor to respond to all requests within 30 days or, in any event, as required or permitted by applicable law.

---

## **Principle 10 - Handling Inquiries and Challenges**

An individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Tremblant International Blues Festival's compliance with the Policy.

**10.1** Tremblant International Blues Festival shall maintain procedures for addressing and responding to all inquiries or complaints from individuals about Tremblant International Blues Festival's handling of personal information.

**10.2** Tremblant International Blues Festival shall inform its customers about the existence of these procedures as well as the availability of complaint procedures.

**10.3** The person or persons accountable for compliance with this Policy may seek external advice where appropriate before providing a final response to individual complaints.

---

If you have questions or concerns about our privacy policy or practices, or would like changes to the communications we send you, please contact us.

Email: [information@avtremblant.com](mailto:information@avtremblant.com)

Phone: 819-681-3000 #46643

Mail: 1000, chemin des Voyageurs  
Mont-Tremblant (Québec) J8E 1T1

### **UNSUBSCRIBING**

If you prefer not to receive any additional promotional material please email us at [information@avtremblant.com](mailto:information@avtremblant.com). If you have questions about the collection or use of your information please call 819-681-3000 #46643.

Policy Update: April 27, 2015