

MPH TRAVEL INC. PRIVACY POLICY

You shared personal information with us when you first became a client of MPH Travel. You did this so that we could serve you better, knowing that we would honour and respect your privacy. Your trust was not misplaced. Please review this publication carefully, as we want you to know about our commitment to use and disclose your personal information responsibly and only to the extent necessary for the travel products and services we provide.

What is personal information?

Personal information identifies who you are.

Your personal information is acquired when you provide it to us, or when a third party books travel on your behalf, such as a family member or business colleague. Examples of personal information we collect include: your full name, street address, e-mail address, telephone and fax numbers, date of birth, marital status, credit card information, passport or visa information, frequent flyer or loyalty program account numbers, health information (for travel insurance purposes), and other personal information necessary to identify you and your entitlement to the services we arrange.

Personal information also includes information about your travel requirements, (e.g., flight, hotel, and car preferences) as well as your interests and expectations. We may use this information to keep you informed of topics of interest based on the information you provide. You should obtain the consent of individuals travelling with you prior to providing us with their details. They will not be able to access our systems to view or change information you provide on their behalf.

Collecting, using and disclosing your personal information

We collect, use, and disclose personal information to fulfill our service obligations. Collecting personal information allows us to make and secure reservations, issue transportation documents and vouchers, and to provide travel suppliers with information to complete the necessary purchasing arrangements for a wide array of travel and tourism products.

Your personal information permits us to: (Identified Purposes)

- 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 on-going service
- comply with legal requirements

If your personal information is not needed for any one of the above "Identified Purposes", we will not use or disclose it without obtaining additional consent from you. We will only share your personal information, as needed, with our service providers that perform certain services or functions on our behalf or as required by law.

How do we gather your personal information?

The collection, use and disclosure of your personal information depends on how you do business with us. For example, we may gather information based on booking or other forms filled out by you or over the telephone, by e-mail, or during face-to-face interviews.

Your consent

Your knowledge and consent are necessary before we may collect, use or disclose your personal information, except when required by law. Should we wish to use your personal information for a purpose not contemplated at the time of initial collection, we may contact you again for your consent.

How do you provide us with your consent?

We accept any of the following as your consent for our existing use, future collection, and disclosure of your personal information for the Identified Purposes:

- your receipt of our *Privacy Policy*, unless you advise us, either orally or in writing, that you do not agree with the terms stated in our *Policy*, and that you wish to opt out of all portions of it
- your express written consent via mail, e-mail, or fax
- your express verbal consent with a dated notation in our file, along with the initials of the staff member who recorded the information
- your consent as provided by your authorized representative such as a legal guardian or power of attorney

In some circumstances, your consent may be implied.

- If you purchase travel through us for your family or anyone else you represent, it is understood that you have obtained consent from them.
- If you request amendments to your information, it is assumed that the original consent remains in effect.

Questionnaires and Contests

We may offer you an opportunity to take part in a questionnaire or contest, which may require your full name, e-mail address and street address. You are under no obligation to participate.

You have the power to say "no".

You can withdraw your consent.

You may withdraw your consent at any time with reasonable notice. Withdrawal of your consent may affect our ability to continue to provide you with the travel products and services that you have come to expect from us.

To withdraw your consent, you should contact our Privacy Officer at the address, e-mail or telephone number listed. Unless we hear otherwise, you are giving us your consent for the collection, use and disclosure of personal information as provided in this Policy for the Identified Purposes.

How long do we keep your personal information?

Your personal information is retained only as long as we need it to effectively provide travel products and services to you and for a reasonable length of time thereafter in case we need to meet any legal or government requirements.

How do we protect your personal information?

Whether in electronic or paper-based format, we maintain strict security system controls as required by *IATA* and the *Personal Information Protection and Electronic Documents Act* to safeguard your personal information from unauthorized access, disclosure, or misuse. When we no longer need your personal information, we take as much care in destroying it as we do when storing it.

In the event that we transfer your personal information to a third party for processing travel (e.g., when booking your travel with an airline, cruise line, or other travel vendor), we contractually require the person or organization providing travel products or services on our behalf to protect your confidentiality in a manner consistent with our internal safeguards, or as required by law.

How is your personal information secured?

- Our file server is backed up daily, weekly, and monthly with back-up tapes maintained in our on-site safe.
- Workstations are turned off at the end of each workday with individual passwords required at each station.
- Monitors are turned away from exterior windows.
- Paper records are kept in locked filing cabinets.
- We shred all records that include personal information belonging to persons we have had no correspondence with for a period of five (5) years, unless such information is required to be maintained for statutory reasons.
- Our office is equipped with a monitored security system.

Your right to access your personal information.

You have the right to access your personal information in our possession or control. You also have a right to know which third parties have received your information from us.

To access your personal information, please make your request in writing to our *Privacy Officer*, outlining what personal information you are requesting. We will try to respond to your request within 30 days. We may charge you a reasonable fee for providing this service, but only after first advising you of the approximate cost.

We have the right to refuse your request for access to personal information if:

- doing so would reasonably be expected to threaten the life or security of another individual
- the information was collected for purposes related to the detection and prevention of fraud
- the information was generated in the course of a formal dispute resolution process, or
- the information would likely reveal personal information about another individual
- the information you are seeking is protected by solicitor-client privilege

Keeping your information accurate

We strive to ensure that the personal information we have on file about you is as accurate and up-to-date as necessary for the Identified Purposes for which it is to be used. If any information needs to be updated or amended to reflect a change in your situation, we make every effort to update our records. We shall amend personal information that is materially inaccurate or incomplete and, where appropriate, shall endeavour to advise other parties having access to the information in question.

How to contact us

For more information, to make enquiries, or to opt out of all or parts of this Policy, please contact:

Privacy Officer-Howard Ekstein

MPH Travel Inc.

142 Dupont Street

Toronto ON M5R 1V2

Telephone 416 966-5411

Fax No. 416 924-9571

E-Mail info@mphtravel.com

Internet www.mphtravel.com

If you have a complaint, we want to know about it.

Please contact our Privacy Officer if you have a complaint related to our *Privacy Policy* or any of our procedures. If your complaint is justified, we will take the necessary steps to resolve the issue, including amending our Policy and practices if warranted. If we are not able to resolve your concern, or if you have any other concerns about our Privacy Policy and procedures, you may contact the Office of the Privacy Commissioner. We will provide you with this contact information upon request.

About our Privacy Policy

This Privacy Policy sets forth the responsibility of MPH Travel Inc. and your rights as our client regarding the collection, use and disclosure of your personal information.

This Policy is subject to any amendments which will be posted on our website and will also be available from our Privacy Officer by calling 416 966-5411.

Your Consent to Maintain and Use Personal Information

On January 1, 2004, the Personal Information Protection and Electronic Documents Act (PIPEDA) is signed into law by the Government of Canada. Accordingly, in order to be in compliance with the Act, MPH Travel Inc. is required to obtain consent from you, our customer, in order to use personal information, which may already be on file or in our data systems. The personal information, which we maintain and use, is solely for the purposes of servicing travel arrangements, which you request that we undertake. This information is stored, secured, disclosed, and handled in strict accordance with *PIPEDA*, *IATA*, and our compliant *Privacy Policy*. Our *Privacy Policy* is available anytime for your review and consideration. If you wish to receive a copy via e-mail, or address mail, please let us know.

I authorize MPH Travel Inc. to continue to maintain and use my personal information that MPH Travel Inc. may already have access to and to use same in strict accordance with the *Privacy Policy* stated herein.

Name: _____

Date: _____

Signature: _____

For Corporate Authorized Signatures

Name of Company: _____

Authorized Signature: _____

Date: _____