

Privacy Policy

United Horsemen of Alberta Inc.

United Horsemen of Alberta ("we" or "our") maintains a firm commitment to the privacy of our customers' Personal Information (defined below under the heading "What is Personal Information?"). The following outlines our commitment to you:

- **Purpose and Consent:** At the time of collection we will explain to you the purpose of collecting your Personal Information and obtain your consent to collect, use and disclose your Personal Information.
- **Limiting Collection:** We limit the collection of Personal Information to what is reasonable under the circumstances and your Personal Information will only be used for the purposes for which it is collected.
- **Security:** Your Personal Information is kept strictly confidential and is not disclosed outside of our operations without your consent, unless required by law.
- **Access:** You have the right to access the Personal Information that we maintain about you and to correct any inaccuracies.

We have adopted the 10 principles established by the Canadian Standards Association's Model Code for the protection of Personal Information. These principles are in accordance with the *Personal Information Protection and Electronic Documents Act* ("PIPEDA" or the "Act") which establishes the rules governing the collection, use and disclosure of Personal Information in Canada. We will periodically review our principles in order to ensure that they remain relevant and current with changing technologies and laws and the evolving needs of our customers and employees.

Our 10 Principles

1. **Accountability:** We are responsible for maintaining and protecting Personal Information under our control. We have appointed a Chief Privacy Officer to oversee our compliance with the Act and our 10 principles.
2. **Identifying Purposes:** We will identify the purposes for which Personal Information is collected, either before or at the time of collection.
3. **Consent:** We will only collect, use and disclose Personal Information with a customer's knowledge and consent, except where otherwise required or permitted by law.
4. **Limiting Collection:** We will limit the collection of your Personal Information to only those details that are necessary for the purposes identified.
5. **Limiting Use, Disclosure and Retention:** Your Personal Information will only be used or disclosed for the purposes for which it was collected, unless you have otherwise consented, or where it is required or permitted by law. We will retain your Personal Information only as long as necessary to fulfill the purposes identified.
6. **Accuracy:** We will keep Personal Information that we collect accurate, complete and up-to-date to fulfill the purposes for which it was collected.

7. **Safeguards:** We will protect your Personal Information with security safeguards appropriate to the sensitivity of the information.
8. **Openness:** Specific information about our policies and practices relating to the management of Personal Information will be made available to you upon request.
9. **Access:** At your request, we will inform you of the existence, use and disclosure of your Personal Information and give you access to your Personal Information. You have the right to challenge the accuracy and completeness of your Personal Information and to have it amended as appropriate.
10. **Challenging Compliance:** You may contact us with any questions, complaints or suggestions with respect to the above principles.

What is Personal Information?

Personal Information is broadly defined as information about an identifiable individual, but does not include the name, title, business address, or telephone number of an employee of an organization. Personal Information with personal identifiers removed (removes your identity from the information) is not considered Personal Information.

Personal Information We Collect

With your consent, we may collect Personal Information from you in person, either by telephone, by mail, by intercept survey or through the Internet. Typically, we collect and maintain the following:

Name
Mailing Address
Email Address
Telephone Number

- It is always your choice as to whether you provide us with your Personal Information.

How We Use Your Information

Relationships With Our Customers Are Important To Us

We want to provide you with our various services on an ongoing and efficient manner to establish a long lasting relationship which will meet your changing needs.

With your permission, we collect Personal Information about you to:

- Provide you with products, services or information that you request
- Assist in identifying your preferences
- Provide you with information about upcoming events, promotions and new and improved services
- Protect you and us, against error and fraud
- Comply with legal requirements

Your Personal Information may also be used to provide us with business statistics. These statistics do not contain any information which identifies you personally.

You Can Choose Not To Receive Direct Marketing

We may inform you about our events, promotions or services by mail, telephone, e-mail or other means. If you do not wish to receive direct marketing, contact us and tell us that you do not want to be contacted in a particular way. See below for contact details.

Giving Consent

Key to protecting the privacy of your Personal Information is consent. We collect, use and disclose your Personal Information only with your consent except where otherwise required by law.

You may decline to provide us with your Personal Information. However, this choice may make it impossible for us to provide you with certain products or services. For example, we cannot set up a telephone wagering account with Internet access without the Personal Information which is required by the Canadian Pari-Mutuel Agency, the agency which regulates pari-mutuel wagering, on behalf of the Ministry of Agriculture (Agriculture Canada.)

Withdrawing Consent

You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. If you wish to withdraw your consent we will inform you of the implications. To withdraw your consent, simply contact us and tell us of the Personal Information which you no longer wish us to collect, use and/or disclose. See below for contact details.

Security and Disclosure of Your Personal Information

We recognize your concerns about the security of the Personal Information which you provide to us. Our processes and procedures keep your Personal Information safe and secure. We have different safeguards in place (physical, technological and organizational).

Your Personal Information will not be used or disclosed without your consent, except where required or permitted by law. We will only use and disclose your Personal Information to fulfill the purposes for which it was collected. Other uses of your Personal Information will only be undertaken after we have obtained your additional consent. We will only keep your information for as long as needed for the stated purposes.

Your Personal Information will not be sold to any organization for any purpose.

We will not disclose your Personal Information to any third party without your approval, except that we reserve the right to disclose your Personal Information: (a) to any of our affiliates, subsidiaries, third party service providers or advisers that we deems appropriate; (b) if such disclosure is made pursuant to a legal proceeding or as required by law; (c) to another business entity should we plan to merge with, or be acquired by that business entity; or (d) organizations involved in a merger, transfer or sale of our assets or business.

In the event that we disclose your Personal Information as set out of above, we will require third party organizations who have access to your Personal Information to protect and maintain your Personal Information in compliance with the terms and conditions of this Privacy Policy.

Access and Update of Your Personal Information

Accessing your Personal Information

You may access and verify your Personal Information. At the time of your request we will need specific information to verify your identity before we can provide you with the Personal Information we hold.

In some instances, we will not be able to provide you with the Personal Information you request, for instance where that information:

- Contains references to other persons
- Has already been destroyed due to legal requirements or because the information has served its purposes
- Cannot be disclosed for legal reasons (e.g. when subject to solicitor-client or litigation privilege)

If we are unable to provide you with access to your Personal Information, we will explain why and advise you as to any recourse available to you.

Updating your Personal Information

We are committed to maintaining the accuracy of your Personal Information. To help us keep your Personal Information up-to-date we encourage you to notify us of inaccuracies or corrections. Timely notification of a change of address or telephone number helps us in providing you with the best possible service. You can contact us via our Web Site @ www.uha.ca.

We reserve the right to amend this Privacy Policy at any time. If we decides to amend this Privacy Policy, we will provide you with notice of such amended terms by posting on our Web Site so that you will always know what information we gather, how we might use that information, and whether we will disclose it to anyone. All amended terms shall be effective immediately upon such notice.

Contact Us

If you have any questions, concerns or complaints regarding the privacy of your Personal Information, you may contact us at the address listed below. We will inform you of our complaint procedures and assist you in resolving the situation. If a complaint is found to be justified, appropriate steps will be taken including, if necessary, revisions to our practices and procedures.

Please write or e-mail:

Chief Privacy Officer
United Horsemen of Alberta Inc.
Suite 160, 3015 – 12 Street NE
Calgary, Alberta
T2E 7J2

privacy@uha.ca

For more information on the United Horsemen of Alberta's commitment to privacy, contact the horsemen through our website: www.uha.com

For copies of the CSA Model Code for the Protection of Personal Information contact the Canadian Standards Association or visit their Website at www.csa.ca

For copies of the Personal Information Protection and Electronic Documents Act (PIPEDA) contact the Department of Justice or visit <http://laws.justice.gc.ca>