



GRANITE CLUB

1875

PRIVACY POLICY

The Granite Club is committed to protecting your privacy. We comply with applicable privacy and anti-spam legislation and otherwise deal with personal information in a manner consistent with the principles that are reflected in such legislation. Personal information is any information about “you” as an identifiable individual, and includes information such as your name, date of birth, email address, or payment information.

This document explains the nature of our commitment to protecting the privacy of Members and their Guests, as well as of those visiting our Website (graniteclub.com) and using our App. It also identifies how individuals can learn more about how we manage personal information. The Active Therapy Clinic is subject to separate policies and procedures that govern its handling of personal health information.

If you do not agree with this Privacy Policy and how we handle your personal information, please do not provide us with your information and stop using our Website.

We may update our privacy policy from time to time, and such changes will become effective as soon as the revised policy is posted. If we make material changes to how we treat your personal information, we will alert you to those changes by sending you an email or posting a notice of change on our Website.

POLICY STATEMENT

Our commitment to protecting privacy includes the following:

- Protecting privacy by designating a responsible individual and by assigning internal responsibility to promote privacy protection
- Developing, maintaining and enforcing practices that are necessary to protect privacy and by providing information about such practices on request
- Collecting, using and disclosing personal information only as necessary for purposes reasonably required and only with the consent of the individual, unless otherwise required or permitted by law
- Making a reasonable effort to ensure that personal information collected by us or on our behalf is accurate and complete
- Making reasonable security arrangements to prevent loss and unauthorized access, collection, use, disclosure, copying, modification or disposal and similar risks to personal information under our control
- Providing access to personal information and a right of correction to personal information as required by law
- Retaining personal information as required by law and as otherwise in accordance with designated retention periods
- Maintaining a process for receiving and responding to complaints and other feedback on privacy issues

COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

In general, we collect personal information required for the Club's operational use, including contact information, demographic information, data pertaining to use of facilities, and information about individual preferences. We do not collect or store any credit card information; any credit card payments are facilitated directly via our third-3rd party payment provider.

We collect personal information for the following purposes:

- to process membership applications
- to administer memberships
- to provide secure access to facilities, products and services
- to tailor services to meet individual preferences
- to communicate information about our facilities, products and services
- to administer surveys, contests and other promotions
- to enhance our facilities, products and services and our marketing efforts
- to make decisions regarding service offerings.

We ordinarily bring these and any other applicable purposes to individuals' attention at or before the time we collect personal information.

In order to ensure a safe environment at our facilities, we have installed video surveillance equipment in some locations. These surveillance cameras are deployed on a minimal intrusion basis and only in accordance with our [video surveillance policies](#) and procedures. This includes access restrictions and strict retention periods. If you would like more information about these practices, please contact our Privacy Officer.

COMMERCIAL COMMUNICATIONS

We often communicate directly with Members about our facilities, products, services and promotions, but only do so based on consent. We also provide Members with a means of telling us if they do not wish to be contacted. When we send commercial electronic messages, we do so in compliance with the specific requirements set out in Canadian "anti-spam" legislation to the extent it applies. You are always able to opt out of receiving these messages by clicking on the unsubscribe mechanism in the electronic message.

WEBSITE AND APP PRIVACY

We maintain a website at GraniteClub.com and a mobile application that may require individuals to register by providing us with personal information. Our use and disclosure of personal information collected through the registration process is governed by this policy and our privacy practices.

OUR COMMITMENT TO SECURING YOUR PERSONAL INFORMATION

We make reasonable security arrangements to protect personal information against such risks as unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction. From time to time, we engage third- party information security experts to audit our security arrangements to identify opportunities for enhancement, if any.

Our commitment to securing personal information extends to information that we have transferred to service providers who help us communicate, help us manage personal information and help us undertake similar activities. We select, retain and manage our service providers with a view to maintaining reasonable protection of personal information.

We process and store most personal information by ourselves or by service providers that reside in Canada.

When we process or store personal information by using service providers who do not reside in Canada (including by using our affiliates) we select, retain and manage such service providers with a view to maintaining reasonable protection of personal information and with a view to managing any security risks posed by unique social or political factors.

FOR FURTHER INFORMATION

Individuals may contact our Privacy Officer:

- to ask about this policy or the Granite Club's Member privacy practices
- to ask questions about the processing or storage of personal information
- to request access to personal information in accordance with applicable privacy legislation
- to lodge a privacy complaint

Our Privacy Officer can be reached at the following address:

John Gravett

Chief Executive Officer

Granite Club

2350 Bayview Avenue

Toronto, Ontario M2L 1E4

[416-510-6663](tel:416-510-6663)

ceo@graniteclub.com

In the unfortunate case that we are not able to address your concerns, you also have the right to make a complaint to the Office of the Privacy Commissioner of Canada at [1-800-282-1376](tel:1-800-282-1376) (toll-free).