

# KARATE BC PRIVACY POLICY

## 1. INTRODUCTION

EFFECTIVE 4/20/2010

Karate BC ('Karate BC') respects your privacy and takes responsibility for personal information under its control. The protection of personal information is subject to the provisions of the BC Personal Information Protection Act ("PIPA"), and may be subject to comparable provincial or federal privacy law in Canada.

This Privacy Policy explains how Karate BC collects, uses and discloses the personal information that may be provided to Karate BC. Responsibility for ensuring compliance with this Privacy Policy rests with senior management of Karate BC, which shall designate one or more persons to be accountable for compliance with this Privacy Policy. Other individuals within Karate BC may be delegated to act on behalf of the designated person(s). Upon request, Karate BC shall make known the title of the person(s) designated to oversee the company's compliance with this Privacy Policy.

This Privacy Policy outlines the principles and practices Karate BC will follow in order to protect your personal information. Karate BC will ensure the accuracy, confidentiality and security of your personal information, and as well will follow the legal requirements to allow you to request access to and correction of your personal information.

## 2. SCOPE

This Privacy Policy applies to Karate BC. Karate BC reserves the right to amend this Privacy Policy from time to time to ensure that it is kept current and in compliance with changing laws and regulations.

This Privacy Policy does not impose any limits on the collection, use or disclosure of personal information that:

- (a) is covered by one of the exceptions in Sections 12, 15 and 18 of PIPA with respect to collection, use and disclosure of personal information without consent;
- (b) was collected prior to January 1, 2004, where the personal information is used and disclosed in order to fulfill the same reasonable purpose for which it was collected;
- (c) is covered by or subject to the *Freedom of Information and Protection of Privacy Act* or the federal *Access to Information and the Privacy Act*.

This privacy policy applies to personal information that Karate BC collects through its website (the "Website"). However, the Website may contain links to other entities' websites that are not controlled or operated by Karate BC. This Policy does not apply to such third party websites, and Karate BC is not responsible for the content of such third party websites or the privacy practices of such third parties. Therefore, we encourage you to request and review the privacy

policies of any third parties upon disclosing your information to such parties or visiting such third party websites.

### **3. DEFINITIONS**

“Collection” means the act of gathering, acquiring or obtaining personal information from any source, including third parties, by any means.

“Consent” means voluntary agreement to the collection, use or disclosure of personal information for reasonable purposes, which are made known to the individual. Consent can be express or implied. Express consent can be oral or written, but is always unequivocal. Implied consent is consent that can be reasonably inferred from the action or inaction of an individual.

“Disclosure” means making personal information available outside Karate BC.

“Use” means the treatment, handling, management and retention of personal information within Karate BC.

“Personal information” means information about an identifiable individual, but does not include the name, position, name or title, business telephone number, business address, business e-mail or business fax number of the individual. It also does not include the work product information of the individual.

“Contact information” means information that allows an individual to be contacted at work. It includes the name, position name or title, business telephone number, business address, business e-mail and business fax number for the individual.

“Work product information” is information that is prepared or collected by an employee as part of that individual’s work responsibilities, but does not include information about an individual who did not prepare or collect the information.

### **4. WHY WE COLLECT AND USE PERSONAL INFORMATION**

Karate BC 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.

- (a) Karate BC collects personal information for the following purposes:
  - (i) To provide the product, service or information you requested: if you are a Karate BC customer, 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.
  - (ii) 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.

- (iii) To send you information: from time to time we may send you further information about the products and Karate BC.
- (iv) To manage and develop Karate BC's business and operations, including transfer of data among affiliated entities.
- (v) To develop, enhance, market and/or provide products and services.
- (vi) To meet legal and regulatory requirements.
- (vii) For purposes identified to individuals or purposes obvious to individuals, in respect of particular collections of personal information.
- (viii) To establish and maintain a responsible commercial relationship with customers.
- (ix) In addition, from time to time, we may use your personal information for the following purposes:
  - (1) to detect and protect Karate BC and other third parties against error, fraud, theft and other illegal activity, and to audit compliance with Karate BC policies and contractual obligations;
  - (2) to understand your needs and preferences, including to contact and communicate with you and to conduct surveys, research and evaluations;
  - (3) to engage in business transactions, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving Karate BC;
  - (4) for any other purpose we may indicate to you from time to time.
- (b) Karate BC shall, as appropriate, specify orally, electronically or in writing the identified purposes to the individual at or before the time personal information is collected from or on the individual. Upon request, persons collecting personal information shall explain these identified purposes in a manner that can be reasonably understood or refer the individual to a designated person within Karate BC who shall explain the purposes.

## **5. LIMITS ON COLLECTION, USE, AND DISCLOSURE**

Karate BC will only collect and use personal information that is necessary to fulfill the purposes identified in the section 4.

Karate BC will not collect, use or disclose personal information except for the identified purposes unless we have received further consent from the individual.

Karate BC will only collect, use or disclose personal information in accordance with PIPA.

## **6. HOW WE DISCLOSE PERSONAL INFORMATION**

Karate BC will only use or disclose personal information where it is necessary to fulfill the purposes for which it was collected, or for a purpose reasonably related to those purposes. As part of fulfilling the purposes for which the information was collected, as set out earlier in this Policy, Karate BC will be disclosing personal information to certain third parties, including vendors who supply products sold by Karate BC, and shippers of the products sold by Karate BC.

To the extent that we enter into contracts or other arrangements with third parties, which involve the transfer of personal information, we will ensure that the third party enters into appropriate covenants with us to provide the same level of protection over your personal information that Karate BC provides.

In some cases, Karate BC may seek your prior consent for the use and disclosure of your information after it has been collected, but before it is used or disclosed, for example, where Karate BC wants to use your personal information for a purpose not previously identified to you.

Karate BC does not, as a condition of supplying products or services to you, require you to consent to collection, use or disclosure of personal information beyond what is necessary to provide the product or service.

Karate BC does not attempt to obtain consent for collecting, using or disclosing your personal information by providing false or misleading information regarding the purposes for the collection, use or disclosure of your personal information or by using deceptive or misleading practices. Karate BC will not sell, rent or lease your personal information to third parties unless we have obtained your prior explicit consent to do so.

## **7. HOW WE OBTAIN CONSENT TO COLLECT, USE, AND DISCLOSE PERSONAL INFORMATION**

Karate BC will obtain consent to collect, use or disclose personal information except where as noted in this Privacy Policy, we are authorized or required to do so without consent.

Consent can be provided orally, in writing, or electronically, or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious to a reasonable person and you voluntarily provide your personal information for that purpose.

Consent may also be implied where you are given notice and a reasonable opportunity to opt out of your personal information being used or disclosed and you do not opt out.

Karate BC collects personal information through the Website only if you choose to complete the online forms to contact us, purchase products through us, sign up for our email list, provide

design or product feedback or request information or assistance through the Website. The personally identifiable information that Karate BC collects through these portions of the Website may include your name, username, password, email address, address and telephone number and any other personally identifiable information that you choose to provide. You represent and warrant that you have the right and authority to provide any information provided by you. By submitting personal information to Karate BC via the Website, you agree that we may collect, use and disclose such personal information in accordance with this Policy and as permitted or required by law.

In determining the appropriate form of consent (i.e. express or implied), Karate BC will take into account the sensitivity of the personal information in question. When collecting personal information of a sensitive nature, Karate BC will ensure it obtains express consent for the collection of such information.

Subject to the personal information being necessary to provide the service or product or where the withdrawal of consent would frustrate the performance of a legal obligation, you can withhold or withdraw your consent from Karate BC to use your personal information for particular purposes. If you choose to withdraw your consent to the collection, use and disclosure of your personal information, Karate BC will advise you of the consequences of the withdrawal.

## **8. USE OF TECHNOLOGY ON THE WEBSITE**

The Website uses cookie technology to make your use of the Website more convenient. A cookie is a text file which enables the Website to store any information about your activities on the Website or the length of your stay. Personal information about your visits to the Website is used on an aggregate basis, which means it is used for statistical purposes to assist us in enhancing your online experience, or to evaluate the materials that we may carry on the Website.

A cookie is a small data file that certain web sites write to your hard drive when you visit them. A cookie file can contain information such as a user ID that the site uses to track the pages you've visited, but the only personal information a cookie can contain is information you supply yourself. A cookie can't read data off your hard disk or read cookie files created by other sites.

Some parts of the Website use cookies to track user traffic patterns. We do this in order to determine the usefulness of the information on this site to our users and to see how effective our navigational structure is in helping users reach that information. Karate BC does not correlate this information with data about individual users, nor does it share this information or sell it to any third party.

If you prefer not to receive cookies on the Website, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence.

## **9. HOW LONG WE RETAIN PERSONAL INFORMATION**

Karate BC will retain your personal information only as long as necessary to fulfill the identified purposes, or to fulfill a legal or business purpose.

Karate BC will develop guidelines and implement procedures to govern the destruction or anonymization of personal information which is no longer to be retained.

## **10. HOW WE KEEP PERSONAL INFORMATION SECURE**

Karate BC has implemented security safeguards to protect personal information regardless of the format in which it is held, against loss or theft, unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks. Karate BC uses safeguards which are appropriate to the sensitivity of the information.

Karate BC uses the following security measures to ensure that your personal information is being appropriately protected:

- (a) Physical measures such as locked filing cabinets, drawers and offices;
- (b) Organizational measures such as limiting access on a “need to know” basis and requiring service providers to provide comparable security measures;
- (c) All Karate BC employees will be made aware of this Privacy Policy and the importance of maintaining the confidentiality of personal information;
- (d) Technological measures such as the use of user ID’s, passwords, encryption, and internet firewalls, and anti-virus software; and
- (e) When disposing of or anonymizing personal information, Karate BC will use appropriate security measures to ensure that your personal information is not inappropriately used.

Karate BC will, on a regular basis, review and update security policies and controls as technology changes to ensure ongoing personal information security that meets industry standards.

Unfortunately, no data transmitted over the Internet is ever 100% secure. As a result, Karate BC does not represent, warrant or guarantee that personal information will be protected against loss, misuse, interception or alteration and does not accept any liability for personal information submitted to us via the Internet, nor for your or any third parties’ use or misuse of personal information.

## **11. HOW YOU ENSURE THAT PERSONAL INFORMATION IS ACCURATE**

Karate BC will make reasonable efforts to ensure that your personal information is accurate and complete if it will likely use it to make a decision that directly affects you, or if Karate BC is likely to disclose it to another organization.

Karate BC will not routinely update personal information. To the extent that you believe that the personal information you provided to Karate BC may no longer be accurate or complete, you may advise Karate BC to update its records. A request to update your personal information must be made in writing and provide sufficient detail to identify the personal information and the

correction being sought. Your request to update or correct your personal information should be forwarded to Karate BC's Privacy Officer:

In writing:

Privacy Officer  
Karate BC  
225 – 3820 Cessna Drive  
Richmond, B.C. Canada  
V7B 0A2

If you successfully demonstrate to Karate BC that your personal information is inaccurate or incomplete, Karate BC will correct the personal information as required. Karate BC will also send the corrected information to any other organization to which Karate BC disclosed your personal information in the prior year.

If Karate BC determines that no correction is required to be made, we will nevertheless note your request for the correction and annotate your file accordingly.

## **12. HOW WE PROVIDE INDIVIDUALS WITH ACCESS TO THEIR PERSONAL INFORMATION UNDER OUR CONTROL OR CUSTODY**

You have a right to access the personal information that is held by Karate BC. This right is subject to exceptions which are set out in PIPA.

In order to obtain access to your personal information, you must make a written request that provides sufficient detail to allow Karate BC to identify the personal information being sought.

You may be required to provide sufficient personal information to identify yourself in order to enable Karate BC to verify your identity before providing you with your personal information. You may also be asked more specific questions about the type and amount of personal information that you are seeking.

Karate BC will make the information available within 30 working days. If Karate BC is seeking an extension in order to respond to your request, Karate BC will provide you with written notice of the extension.

In responding to your access request, Karate BC will provide you with your personal information that is under its control, information about the ways in which the personal information has been and is being used by Karate BC, and the names of the individuals and organizations to whom the personal information has been disclosed by Karate BC.

If Karate BC refuses in whole or in part to provide you access to your personal information, we will notify you in writing. The notification will include providing you the reasons for the refusal, in particular, the exceptions in PIPA upon which we are relying, and will advise you of any recourse which is available to you as a result of Karate BC's refusal.

### **13. HOW INDIVIDUALS CAN COMPLAIN, ASK FOR ACCESS OR ASK QUESTIONS**

At any time you may seek information about Karate BC's privacy policies and practices by contacting Karate BC's privacy officer at

In writing:

Privacy Officer  
Karate BC  
225 – 3820 Cessna Drive  
Richmond, B.C. Canada  
V7B 0A2

If you have a question or a complaint about Karate BC's privacy practices, you should direct that complaint, concern or question in writing to the Privacy Officer designated under this Privacy Policy. Karate BC has implemented Inquiry/Complaint Handling Procedures to receive and respond to your inquiry or concern or complaint about the policies and practices relating to the handling of your personal information.

If you provide a written complaint, concern or question to Karate BC, Karate BC will advise you of the complaint procedure. Karate BC will also conduct a review into your concern or complaint. If Karate BC concludes that a complaint is justified, Karate BC will take appropriate measures which may include amending its policies and practices. Karate BC will inform you of the outcome of its review regarding your question or complaint.

If you are not satisfied with the resolution proposed by Karate BC, you will be advised as to the appropriate procedure to elevate your concern.

Privacy and Security of Members information is herein expressed in accordance with both identified law and Society concerns with the holding of said information. All efforts to meet respective laws with respect to information security is constantly reviewed and adjusted as necessary.