1. Scope and Purpose
On January 1, 2004, the third phase of the Canadian Federal Law regarding the Personal Information Protection and Electronic Documents Act (PIPEDA) came into effect. This Act governs information collected as part of commercial activity by any private sector organization. It states that information must be gathered with consent, collected for a reasonable purpose, used for the limited purpose for which it was gathered, be accurate, be open for the owner’s inspection and correction, and stored securely.

2. Policy
The Great Canadian Railtour Company (operating as Rocky Mountaineer, herein referred to as “GCRC” or the “Company”) maintains a high level of security with respect to the confidentiality of team member and guest personal information and the Company advises and obtains consent from team members and guests to the terms of collection, disclosure, and storage of personal data.

The following outlines the Company’s principles to which are adhered in protecting personal information.

2.1 Accountability
The Company is responsible to protect all personal information under its control or transferred to a third party for processing. Personal information can include name, home address and phone number, age, identification numbers, credit information (including payment cardholder data), customer preferences and other items that personally relate to the person as an individual. The Company has appointed a Chief Privacy Officer, Steve Sammut, who is responsible for Company accountability and compliance.

2.2 Identifying Purposes
Whenever personal information is collected by the Company, the Company identifies why the information is being collected and how it will be used. If the Company collected information in the past, the Company will not use it for any other purpose than that expressly stated at the time of collection. Some reasons personal information is collected by the Company include:

- Guaranteeing a travel reservation;
- Identifying guest preferences and improving guest service;
- Establishing guest eligibility for promotional opportunities;
- Providing requested product information;
- Informing persons of new products or services that may interest them.
The type of information the Company collect from persons related to a reservation or potential booking with the Company may include: name, address, contact information, travel insurance requirements, travel needs (medical/dietary or physical restrictions), preferences, identity validation on services such as traveller’s cheques, credit information for credit/debit purposes, and publicly available information.

Information is collected directly from the individual through surveys, online registration, and requests for information. It is also collected through the Company’s call centre or sometimes through third party partners who have made the reservation for the person (i.e. Travel Agencies, Tour Operators, Tour Wholesalers). Personal information may also be collected through an employment application.

2.3 Consent
Individual consent will be obtained either in person, through writing, email, telephone, or the Internet. Sometimes consent may be implied (e.g. when transferring relevant information to a hotel partner). Also, the Company may occasionally ask for written or verbal confirmation that the information collected and maintained is accurate and that individual consent is still provided to maintain this information.

Under certain circumstances the Company will need to disclose personal information without individual consent. This may include:
- A life threatening or emergency situation;
- Where required by law; or
- Where required by law enforcement, legal investigation or a regulatory body.

2.4 Limiting Collection
Information collected will only be expressly used for the purpose outlined at the time of collection. The Company will not indiscriminately collect or maintain personal information on its guests or team members.

2.5 Limiting Use, Disclosure and Retention
The Company does not disclose personal information for any purposes other than, for which it was originally collected, unless the Company first obtains consent from the individual. The Company does not sell or rent personal information and the Company will not retain the information for longer than is necessary to fulfill the purpose for which it was originally collected.

2.6 Accuracy
Personal information will be maintained in an accurate, complete and up-to-date format as is necessary and reasonably practical to fulfill the purpose for which it was collected.

2.7 Safeguards
The Company protects personal information by security safeguards, which are appropriate to the sensitivity of the information. These include premises security; locked filing cabinets; information technology security such as restricted access to specific programs, firewalls and software security; and restricting access to personal information only to those team members and partners to which it
is necessary. The Company keeps team members up-to-date on policies and procedures regarding protecting personal information.

The Company may use the services of a third party to process personal information. However, the Company ensures there are confidentiality agreements in place so that information is protected while in their possession.

2.8 Openness
The Company will make its policies and practices that apply to the protection of personal information available to anyone on which it holds information.

2.9 Individual Access
Upon written request, the Company will inform individuals if the Company maintains any personal information about them. If so, the Company will provide it for the individual’s review of accuracy and completeness and will amend it as appropriate. However, the Company reserves the right to confirm individual identity before providing this personal information. The Company can refuse access in certain circumstances including when granting access would have an unreasonable impact on the personal privacy of others, when the request is frivolous or when it may impact the Company’s rights and property.

Requests for access to your personal information should be made in writing to the Chief Privacy Officer by email at ssammut@rockymountaineer.com, or by mail:

Steve Sammut – Chief Privacy Officer
Great Canadian Railtour Company
101 – 369 Terminal Ave
Vancouver, BC V6A 4C4

2.10 Challenging Compliance
The Company’s compliance with this policy may be challenged by directing concerns or complaints to the Chief Privacy Officer by any of the above-mentioned methods.

2.11 Use of our Web Sites
Individuals can visit the Company web sites without telling the Company who they are or revealing any personal information, including their e-mail address. The Company’s web servers automatically recognize the domain name when individuals visit the Company site, and this information is aggregated and used to measure statistics regarding the use of the Company’s site, such as the number of visitors, average time spent on the site, pages viewed and similar information. However, this information is not disclosed or shared with third parties.

The Company’s goal in collecting personal information online is to continually improve the content of the Company’s web sites and to offer guests with tours that best meet their preferences and desires. The Company reserves the right to change this policy at any time. This policy is not intended to and does not create any contractual or other legal rights in or on behalf of any party. By using the
Company web sites, individuals signify their agreement with the terms of the Company’s privacy policy.

The Company’s web sites include links to third party sites that are not governed by the Company’s privacy policy. Once the individuals leave the Company’s site, the Company will not be responsible for other companies’ privacy practices. The Company suggests that individuals review their privacy policy before providing personal information on these sites.

3. References

3.1 Personal Information Protection and Electronic Documents Act (PIPEDA)

3.2 Privacy and Information Protection Policy for Employee Information
**Privacy & Information Protection Policy for Employee Information**

**Written Consent – Please respond**
To ensure that we have written consent to forward your personal information to the various third parties outlined in the policy above, please sign and date below and return the original to the Chief Privacy Officer. This will be added to your team member file.

I hereby give my written consent for GCRC, owners of Rocky Mountaineer to disclose my personal information to the third parties outlined above and as deemed necessary to continue the employment relationship between GCRC and myself.

Signed: __________________________________________

Name (PRINT): ______________________________________

Date: _____________________________________________