

**GRIFFIN TRAVEL CANADA ULC**  
with an assumed name in British Columbia of  
**GRIFFIN MARINE LOGISTICS CANADA LTD.**  
doing business as “**GRIFFIN MARINE AND OFFSHORE**”

(“Griffin”)

## **Privacy Policy**

Griffin respects the privacy of our customers and travellers and is committed to protecting privacy rights of identifiable individuals. In this regard, Griffin has prepared this privacy policy (the “Privacy Policy”) to detail how Griffin collects, uses, and discloses any personal information collected about you.

Griffin is affiliated with corporations, including without limitation, holding companies, subsidiaries, and other affiliates, duly incorporated or formed pursuant to the laws of various jurisdictions and with branch offices throughout the World (the “Affiliates”).

The *Personal Information Protection Act* (the “Act”) regulates the way private sector organizations within British Columbia collect, use, keep, secure and disclose personal information. Griffin recognizes the importance of privacy and recognizes the sensitivity of personal information received by us in the course of providing our travel services, including without limitation, all personal information obtained by Griffin on the form of Traveller Profile submitted by customers and travellers to Griffin and stored by us on our travel reservation system from time to time (the “Traveller Profile”).

This Privacy Policy sets out the following:

- What is “Personal Information”?
- Our Collection, Use, and Disclosure of Personal Information
- Your Consent to Our Collection, Use, and Disclosure of Personal Information
- Requests for Access to Personal Information
- Requests for Correction of Personal Information
- Contacting or Communicating with Us

### What is “Personal Information”?

Your “personal information” as defined at law, including without limitation, as defined under the *Personal Information Protection Act* of British Columbia, as amended from time to time (the “Act”), means all information about an identifiable individual (“Personal Information”). This Personal Information means information that can identify an individual (for example, your name, home telephone number, personal mobile telephone number, home address, personal email address, personal fax number, social insurance number, driver’s licence number, physical description, and credit card or other financial information specifically about you). However, Personal Information does not include business “contact information”, which is defined under the Act as information to enable an individual at a place of business to be contacted for business purposes, such as name, position name or title, business telephone number, business mobile telephone number, business address, business email, or business fax number of an individual.

## Our Collection, Use, and Disclosure of Personal Information

In order to provide convenient and efficient travel services for our customers and travellers, Griffin collects Personal Information on the form of Traveller Profile, as amended from time to time, and stores the same in our reservation system.

Griffin collects, uses, and discloses the following Personal Information obtained on the Traveller Profile for itself and on behalf of the Affiliates and its agents solely for the following specified purposes:

- Full name, home address, home phone number, home facsimile number, home email address, employee identification number (as applicable), and passport number (including country of issuance) Personal Information in order to communicate with you and contact you in respect of your travel plans and to provide our travel services, including without limitation, to facilitate travel reservations, bookings, scheduling, and delivery of airline tickets to you.
- Passport number (including country of issuance) and related Personal Information are disclosed to airlines and governmental, regulatory, and security authorities and entities in compliance with all applicable statutes, regulations, and ordinances in force and effect from time to time, in order to facilitate the travel plans of our customers and travellers, including without limitation, any and all family members and minors travelling with our customers and travellers.
- Credit card numbers, expiry dates, and related Personal Information in order to facilitate payment of travel expenses and to provide to hotels for the purposes of security and damage deposits.
- Frequent flyer program numbers, hotel membership program numbers, car rental membership program numbers, names of airlines, hotels, and car rental agencies, card status, name as it appears on your card, and related Personal Information in respect of any and all customer loyalty programs for which you are a member, for the purposes of ensuring our customers and travellers are appropriately credited with any and all rewards, loyalty points, and other bonuses and promotions in connection with membership in such travel plans.
- Seating preferences (for example, window or aisle) and special needs requests, including without limitation, special meal requests and specific dietary concerns, in order to notify airlines of the preferences and special requests of our customers and travellers to ensure an enjoyable travel experience.
- Any of the foregoing Personal Information to the Affiliates or agents, in order for Griffin to provide emergency after hours travel services and assistance to our customers and travellers and for the purposes of facilitating contact between our customers and travellers at the local offices of Griffin in such countries.
- To inform you of various vacation travel sales, contests, discounts, special offers, and promotions offered by Griffin and its Affiliates from time to time.
- To advise you any of changes or alterations to the terms of service, policies, or features of Griffin and the Affiliates from time to time, including without limitation, the form of the Traveller Profile and the Privacy Policy.
- To respond to your inquiries and communicate with you in connection with Griffin, the Affiliates, the Traveller Profile, and the Privacy Policy.

To better service your needs and to provide the ultimate travel experience, Griffin will share any Personal Information obtained from you on the Traveller Profile or otherwise only with its Affiliates and agents from time to time, for the foregoing purposes. **You should be aware that Griffin will not share or sell your Personal Information to any third parties or organizations other than the Affiliates and parties set out above.** Griffin may communicate with you by email, mail, and various other means of communication for the specific purposes set out above.

### Your Consent to Our Collection, Use, and Disclosure of Personal Information

By inserting the requested Personal Information on the Traveller Profile and providing any and Personal Information to Griffin by way of the Traveller Profile or otherwise, you hereby expressly acknowledge that you will be providing Personal Information to Griffin and the Affiliates from time to time, and therefore you voluntarily consent to collection, use, and disclosure of Personal Information by Griffin and the Affiliates from time to time for the specific purposes set out in the Privacy Policy. You hereby acknowledge and agree that Griffin and the Affiliates may disclose your Personal Information without your consent if required by law and in accordance any applicable exceptions under the Act.

If you have provided your consent to the collection, use, and disclosure of Personal Information by Griffin and the Affiliates from time to time under this Privacy Policy, you may, at any time, withdraw your consent, unsubscribe, and request to decline to have your Personal Information collected, used, or disclosed for any or all of the specific purposes set out in the Privacy Policy. Please refer to “Contacting or Communicating with Us” of the Privacy Policy below in connection with the withdrawal of your consent.

### Requests for Access to Personal Information

The Act permits individuals to submit written requests to us to provide them with:

- their Personal Information under our custody or control;
- information about how their Personal Information under our control has been and is being used by us; and
- the names of the individuals and organizations to whom their Personal Information under our control has been disclosed by us.

Griffin will respond to requests in the time allowed by the Act and will make a reasonable effort to assist applicants and to respond as accurately and completely as reasonably possible. All requests may be subject to any fees and disbursements the law permits us to charge.

### Requests for Correction of Personal Information

The Act permits individuals to submit written requests to us to correct errors or omissions in their personal information that is in our custody or control. Griffin will:

- correct the personal information and, if reasonable to do so, send correction notifications to any other organizations to whom we disclosed the incorrect information; or
- decide not to correct the personal information, but annotate the personal information that a correction was requested but not made.

### Contacting or Communicating with Us

If you have any questions with respect to the Privacy Policy concerning the handling of your Personal Information, wish to withdraw your consent to the collection, use, or disclosure of your Personal Information, or if you wish to request access to, or correction of, your Personal Information under our care and control, please contact our Privacy Officer at:

Aldina Picanco  
Privacy Officer

Griffin Marine and Offshore  
World Trade Centre,  
999 Canada Place,  
Suite 504,  
Vancouver, B.C.  
Canada V6C 3E1

If you are dissatisfied with our handling of your personal information, we invite you to contact our Privacy Officer in writing, setting out the reasons for your concern. If, after our Privacy Officer has reviewed and responded to your concern, you remain dissatisfied, you may wish to contact the Office of the Information and Privacy Commissioner for British Columbia at:

P.O. Box 9038, Stn. Prov. Govt.,  
Victoria, B.C.,  
Canada V8W 9A4  
Telephone: (250) 387-5629  
Fax: (250) 387-1696  
Email: [info@oipc.bc.ca](mailto:info@oipc.bc.ca)  
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