

PRIVACY POLICY AND CODE

Beefeater (Niagara) Limited and its affiliates respect and are committed to taking every reasonable effort to protect the privacy, confidentiality and security of personal information you entrust to us. Only authorized persons, who have a need to know and whom we authorize, have access to personal information.

At our company, it is our intention to give you an understanding about how we collect your information and the use we make of it in the course of our business. In this policy, personal information is defined as: "any information which relates to an individual and allows that individual to be identified".

We limit the collection, use, retention and disclosure of personal information as needed by our company or third party affiliates for the purposes of providing and/or enhancing services to both our customers and employees. Services include but are not limited to: Understanding and analyzing customers responses, needs and preferences; identifying referral and/or repeat business; administering Brand, Property, Company loyalty programs; and providing employee related services.

We do not collect, use or disclose personal information about an individual without the consent of the individual except where such information is required by law. Subject to legal and contractual restrictions, an individual can withdraw their consent to our collection, use or disclosure of their personal information at any time with reasonable notice. If any individual/customer refuses or withdraws their consent for any purpose that is required by us to fulfill our product or service contract with such individual, we will not be able to provide, or continue to provide, such individual with the product or service.

Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of the property. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

The purchase or use of products and services by a guest / customer, or the acceptance of employment or benefits by an employee, may constitute implied consent for our company to collect, use and disclose personal information for the identified purpose.

Based on the information provided to us, we ensure that personal information is processed accurately and completely. It is the responsibility of the individual to provide any updates to personal information, to maintain the accuracy of our records as is necessary for the purposes for which it is to be used.

We maintain the security and confidentiality of the personal information furnished to us according to reasonable standards. Compliance with these standards is reviewed and revised as required.

Security is an important concern to us and we exercise care in providing security of individual information. Individuals have access to personal information that is reasonably available and retrievable in the ordinary course of business. Upon written specific request, we will disclose to the individual personal information about them that is entered in our records. Individuals may correct any of such personal information that is inaccurate or incomplete by providing us with written notice thereof. We will respond to an individual's request, and advise the individual in advance of any charges for retrieval, reproduction or delivery of the personal information requested. Some information may not be accessed if it refers to others, is subject to legal privilege, contains confidential information, cannot be retrieved using a individual's name or ID number, cannot be disclosed for legal reasons, or as otherwise permitted by law.

Individuals may access their personal information by writing to the Company Privacy Compliance Officer.

Retention and destruction of personal information is determined by standard company policy and in conjunction with legislation as applicable.

***Each** company employee is personally responsible for maintaining guest / customer confidence in the company. We provide training and communications programs designed to educate employees about the meaning and requirements of this Privacy Policy. Employees who violate the Privacy Policies and Practices are subject to disciplinary action, up to and including dismissal for cause. Employees are expected to report violations and may do so confidentially - to their manager or to their Company Privacy Compliance Officer. Any team member receiving a complaint is required to bring it immediately to the attention of the Company Privacy Compliance Officer.*

We are committed to investigating all complaints in a proper and timely manner. A complaint or a request for an investigation must be addressed in writing to the Company Privacy Compliance Officer at the above address. A response will be given within 30 business days. If the complaint is justified, the company will take appropriate measures to address the complaint, including but not limited to, allowing access to the requested information, proceeding with the rectification or, as the case may be, amending its Policy and Practices.

Should you have any questions about privacy, please write to the Company Privacy Compliance Officer at the above address.