

# Privacy Policy

## Purpose & Scope

Central Mountain Air is committed to conducting its business and operations in accordance with the highest ethical standards and all applicable laws, regulations, and rules, including full compliance with the *Personal Information Protection and Electronic Documents Act* (Canada) ("PIPEDA"). This policy addresses the continuing commitment of Central Mountain Air to protecting the Personal Information of our customers and employees in accordance with PIPEDA.

This policy applies to all:

- (i) Central Mountain Air Ltd. and its affiliates (collectively "Central Mountain Air"); and
- (ii) officers, directors, and employees of Central Mountain Air Ltd. and any of its affiliates (collectively "CMA Personnel").

This policy is intended to supplement all applicable laws, regulations, rules, and the corporate policies of Central Mountain Air and is not intended to replace any applicable local laws.

## Definitions

- **Commercial Activity:** means any particular transaction, act or conduct or any regular course of conduct that is of a commercial character.
- **Employment Purposes:** means maintaining employment records in compliance with employment, taxation, and other applicable laws.
- **Personal Information:** means information about an identifiable individual (name, date of birth, gender, address, personal telephone number, personal email address), but does not include the name, title or business address of an employee or organization.

## Privacy Officer

Please contact our Privacy Officer:

- If you have any questions about our Privacy Policy;
- If you would like to request access to, or correct the personal information in our possession about you;
- If you wish to make a complaint about how we have handled your personal information or if you believe we have breached the privacy laws that apply to your personal information.

Our Privacy Officer can be contacted at: [privacy@flycma.com](mailto:privacy@flycma.com)

## Policy

### Accountability

Central Mountain Air has designated the Privacy Officer as the person responsible for ensuring that Central Mountain Air complies with the requirements of PIPEDA.

### Identifying Purposes of Collection

Central Mountain Air collects Personal Information for two purposes: (i) Employment Purposes; and

(ii) customer, vendor, or supplier contact information required to support Commercial Activity. Central Mountain Air does not collect Personal Information for any other purposes.

## **Consent**

Central Mountain Air shall collect Personal Information only with the knowledge and consent of the applicable provider of Personal Information. Any Personal Information provided to Central Mountain Air in order to further Commercial Activity shall only be used for such purposes. Any Personal Information provided to Central Mountain Air for Employment Purposes shall only be used for such purposes. Central Mountain Air will obtain the prior consent of the applicable Personal Information provider before it uses such Personal Information for a different purpose.

## **Limiting Use, Disclosure and Retention**

Central Mountain Air will not use or disclose Personal Information collected by it for any purposes other than those specified in this policy unless: (i) Central Mountain Air obtains the prior consent of the Personal Information provider; or (ii) required by law.

Central Mountain Air shall retain Personal Information collected under this policy only for so long as is: (i) reasonably necessary to fulfill the purposes for which the Personal Information was collected; or (ii) required in order to comply with applicable laws. Any Personal Information no longer required to be retained by Central Mountain Air shall be destroyed, erased, or otherwise rendered unusable.

## **Accuracy**

Personal information collected by Central Mountain Air shall be updated for accuracy and completeness as necessary at the sole discretion of Central Mountain Air. All questions or concerns about the accuracy or completeness of Personal Information retained by Central Mountain Air should be addressed to the Privacy Officer.

## **Safeguards**

All Personal Information collected by Central Mountain Air shall be stored and protected against theft and unauthorized access utilizing both physical controls (limited access to physical records) and information technology controls (passwords, firewalls etc.).

## **Openness**

The privacy practices of Central Mountain Air are outlined in this policy. All questions or concerns about the policy should be addressed to the Privacy Officer.

## **Individual Access**

Subject to limited exceptions, PIPEDA grants individuals the right to access and review any applicable Personal Information regarding themselves that is in possession of an organization. All requests to access or review Personal Information in possession of Central Mountain Air should be addressed to the Privacy Officer.

## **Challenging Compliance**

All questions or concerns about the compliance of this Policy with PIPEDA should be addressed to the Privacy Officer.

## ***Discipline***

Any CMA Personnel found to have contravened this policy will be subject to disciplinary action.

In all cases, disciplinary action may include termination for cause, or any other disciplinary action determined by Central Mountain Air.

Disciplinary action taken by Central Mountain Air in respect of any violations of this policy will be in addition to any civil or criminal activity undertaken by any applicable Governmental Authority. Activities that violate this policy may lead to penalties, fines, and imprisonment.