

PRIVACY POLICY

The Flight Shops, Inc. dba GOGO WORLDWIDE VACATIONS (“GOGO”) is committed to protecting the privacy of its clients, employees and other individuals served by or providing services to GOGO. The proper safeguarding of all personal information collected in the course of GOGO’s day-to-day activities is the cornerstone of this commitment. Personal information is any information that identifies and individual, or by which an individual’s identity could be deduced.

GOGO adheres to the principles of the Canadian Standards Association Model Code for the Protection of Personal Information as well as those embodied in applicable privacy legislation to ensure that all information is properly collected, used only for the purpose for which it was collected, and disposed of in a safe and timely manner when it is no longer needed.

OUR TEN PRIVACY PRINCIPLES

1. Accountability

GOGO is responsible for maintaining and protecting the personal information under its control. GOGO has appointed a Privacy Officer who is responsible for ensuring GOGO’s compliance with its privacy obligations.

2. Identifying Purposes

GOGO provides numerous travel services and products to a wide range of clients. GOGO collects personal information in order to provide these services (i.e. make and book travel arrangements), establish and maintain client lists and records, establish and maintain mailing lists, identify fraud or error, to ensure regulatory compliance, for internal accounting and administration and servicing our relationship with our customers by communicating updates on promotions and services and performing market research.

GOGO also collects personal information from its employees for the purposes of establishing, maintaining or terminating the employment relationship including managing payroll, benefits, employee performance evaluations, making recruitment and selection decisions, and to meet legal, security or regulatory requirements.

GOGO shall identify the purposes for which it is collecting personal information before this information is collected.

If GOGO wishes to use personal information for a purpose not contemplated at the time of collection, the individual’s consent will be sought in advance.

3. Consent

Individuals shall be informed and their consent obtained for the collection, use and disclosure of their personal information, except where otherwise required or permitted by law. When it is appropriate, the written consent of the individual shall be obtained (i.e. by mail, email or fax). Sometimes, an individual’s consent may be obtained verbally or implied through their conduct with GOGO (i.e. if purchasing travel insurance, consent to collect the personal information necessary to obtain such insurance will be implied).

As well, GOGO may periodically request written confirmation from an individual that the information collected and maintained by GOGO is up to date and accurate. GOGO, at its option, may also ensure that it has continuing consent to use and retain personal information.

GOGO will disclose personal information, without notice and without consent, only if required to do so by law or in the good faith belief that such action is necessary to:

- cooperate with regulatory bodies and law enforcement officials to conform to obligations imposed by law or statute;
- meet an emergency need; or
- as required pursuant to an investigation.

GOGO primarily acts in the capacity of an agent and accordingly must disclose personal information to other companies that are involved in providing travel services and products to our clients in which case GOGO will rely upon the express or implied consent discussed above. Companies registered in the United States may be required to provide information under the USA PATRIOT Act H.R. 3162. These third parties are required by GOGO to safeguard the personal information and are not permitted to use it for any other purpose.

4. Limiting Collection

GOGO shall only collect the personal information that is required to meet the purposes identified by GOGO. GOGO is committed to collecting personal information in a fair, open and lawful manner. For this reason, GOGO does not indiscriminately collect personal information.

5. Limiting Use, Disclosure and Retention

GOGO does not use personal information for purposes other than those for which it was originally collected, unless it has first obtained the consent of the person from whom such information was received. GOGO retains personal information only for as long as it is needed and only for the fulfillment of the purposes for which it was originally collected.

6. Accuracy

Personal information shall be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purpose for which it was collected.

7. Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the personal information. GOGO's security safeguards include:

- premises security
- locked file cabinets
- restricted access to files containing personal information
- technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access
- internal passwords and security policies to control access to the GOGO network and software
- policy prohibitions against unauthorized use or disclosure

If GOGO uses the services of any third parties to process personal information, GOGO will enter into legal agreements that require them to protect this personal information in a manner acceptable to GOGO. In entering into these legal agreements, GOGO does not transfer any interest in this personal information to them. Rather, the purpose of these legal agreements is to ensure that the personal information delivered to third parties is maintained at a level of security equal to that proved by GOGO under this Policy.

GOGO also ensures that any of its employees who deal with personal information are properly trained and are aware of the necessary and appropriate measures required to protect personal information.

GOGO's website may contain links to other sites. GOGO is not responsible for the privacy practices or the content of such websites and encourages users to read the privacy statements of any such sites. Clients are reminded that no data transmission is 100% secure over the Internet.

8. Openness

GOGO shall make available to individuals on whom it may keep records, all relevant information about GOGO's policies and practices that apply to the management of their personal information. This policy is available on our website at www.gogoworldwidevacations.ca and can be accessed at any time. A hard copy of this policy is also available in each of our shops.

9. Individual Access

Upon request, GOGO will inform an individual if GOGO has any personal information about the individual under its care and control, as well as provide the individual with details about such personal information. GOGO reserves the right to confirm the identity of the person seeking access to personal information before complying with any access request. In responding to an access request, GOGO may charge a reasonable fee.

GOGO is also committed to ensuring the personal information that is collected and maintained is accurate. An individual may challenge the completeness of the personal information under GOGO's care and control. Where an individual successfully demonstrates that an error in the accuracy or completeness of their personal information exists, GOGO will amend the personal information accordingly..

GOGO may deny access to personal information when denial of access is required or authorized by law. Possible reasons for denying access to personal information include:

- when granting access would have an unreasonable impact on other people's privacy
- to protect GOGO's rights and property
- where the request is frivolous or vexatious

If GOGO is unable to provide access to all of the personal information it holds about an individual, then the reasons for the denial of access will be provided to the individual.

Requests for access to an individual's personal information shall be made to the Privacy Officer through privacy.feedback@gogowwv.ca or by mail at:

Risk Management
1133 Melville Street, Suite 600S
Vancouver, BC V6E 4E5

10. Challenging Compliance

An individual may challenge GOGO's compliance with this policy by directing their questions, concerns or complaints to the Privacy Officer at the aforementioned contact information