

## Perimeter Aviation LP Privacy Policy

Perimeter Aviation LP (“Perimeter”) respects your right to privacy and is dedicated to the protection of your personal information. Perimeter follows the requirements of the Personal Information Protection and Electronic Documents Act (Canada) (“PIPEDA”) when collecting, using, retaining, disclosing and destroying personal information.

The Perimeter Aviation LP Privacy Policy (the “Policy”) applies to all personal information under the control of Perimeter, including both customer and employee information, that is collected, used or disclosed in the course of its commercial activities, regardless of whether the personal information was collected prior to or after the implementation of this Policy.

This Policy applies to anyone, including employees of Perimeter or any third party, who collects, uses or discloses personal information on behalf of Perimeter. Perimeter will ensure that all employees who are privy to personal information are trained with respect to their responsibilities pursuant to PIPEDA and this Policy.

## Information Collected

Personal information will be collected when:

### 1. Booking a Flight

The information that Perimeter will collect when you book a flight includes your name, address, email, telephone number, credit card number and expiry date and other personal data. This information will be used for identification and billing purposes.

### 2. Taking Advantage of Special Services

#### *Discounts*

Perimeter offers a discount rate to individuals who are sixty-five (65) years of age and older. To assess your eligibility for the discount rate, Perimeter needs to record your date of birth at the time of booking. At the airport, you will be required to present government-issued identification verifying your date of birth.

#### *Special Assistance*

Perimeter offers travel services to individuals requiring special assistance. Should you require special assistance such as use of a wheelchair, or if you have a medical condition requiring supply of oxygen, we need to record this information at the time of booking.

### *Infants*

Infants under the age of two (2) travelling without a dedicated seat fly at no charge. To assess your eligibility for this benefit, Perimeter needs to record your infant's date of birth at time of booking. At the airport, you will be required to present government-issued identification verifying the infant's date of birth.

### *Reward Program*

Perimeter offers a reward program to customers who choose to enroll. The reward program relies on travel data, including destination, type of ticket purchased, date of travel and other personal information collected through Perimeter's reservation and ticketing system to determine the number of reward points awarded for each purchase.

### *Boarding an Aircraft*

In order to permit boarding on a Perimeter aircraft, you are required to provide personal identification documents, including either one piece of government-issued photo identification or two pieces of government-issued identification with your full name and address. This information will be used for identification purposes and may be recorded and retained by Perimeter to assist with identification in the future.

## **4. Using Medevac Services**

Patient information, such as demographic information and patient care records, is collected during Medevac transfers and is used both to provide appropriate patient care and for billing purposes. Perimeter complies with all relevant personal health information legislation with respect to such information.

## **5. Using Perimeter's Website**

Perimeter will collect safety information voluntarily provided by passengers and employees using its website and will use that information to assist with its Safety Management system initiatives.

## **6. Video Surveillance at Perimeter's Facilities**

Perimeter has video cameras located in and around its premises in order to ensure the safety and security of passengers, employees and property.

## **7. You are Employed by Perimeter**

Perimeter collects personal information from its employees, including their date of birth, Social Insurance Number, address, telephone number, and performance-related information. This information is used to process payroll and employee benefits, to assess suitability for employment and continued employment and to address issues of work performance and misconduct.

Perimeter monitors employee computer, internet and email usage information which is in reference to the Company Network Systems Acceptable Use Policy.

## **Consent**

Consent can be either expressed or implied and can be provided directly by the individual or indirectly by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

By booking travel arrangements with Perimeter and providing your personal information, you provide Perimeter with your consent to collect, use and disclose the personal information provided by you for the purposes set out in this Policy.

If travel arrangements are made through a third party, such as an employer or travel agent, Perimeter will consider the third party to be authorized to disclose and receive your personal information. In such circumstances, Perimeter may disclose your personal information (including, but not limited to, changes to your itinerary or the availability of credits arising as a result of non-travel) to the third party in order to avoid double bookings or unused credits.

There may be situations where Perimeter is required to collect, use or disclose your personal information without your knowledge or consent. Perimeter will only do so when required or permitted by law.

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

The collection of your personal information is necessary for the purposes stated in this Policy. The amount and type of information collected will be limited to that which is necessary to fulfill those purposes.

Perimeter will only use or disclose the personal information it collects for the purposes for which the information was collected. Perimeter will not use or disclose the information for any other purpose without your consent unless required or permitted by law.

Perimeter will retain personal information only for so long as necessary for the information to fulfill its purpose.

## **Accuracy**

Perimeter will ensure that the personal information it collects and retains is accurate, complete and up-to-date for the purposes for which it is to be used.

## **Safeguards**

Perimeter's internet systems are configured with data encryption. This means that when an individual transmits personal information, such as a credit card number, to Perimeter, the electronic data is protected to ensure the safe transmission of the information.

Should Perimeter transfer personal information to a third party for processing, it will use contractual or other means to provide a comparable level of protection while the information is being processed by the third party. In some limited circumstances, personal information may be transferred and/or stored outside of Canada.

## **Openness and Accountability**

Perimeter has a Privacy Officer who is responsible for ensuring Perimeter's compliance with PIPEDA and this Policy. Any questions or concerns regarding this Policy may be directed to the Privacy Officer at:

Address: Privacy Officer  
c/o Perimeter Aviation LP  
614 Ferry Road  
Winnipeg, MB R3H 0T7

Phone: 204-783-8000 ext. 4679.

Email: [privacy@perimeter.ca](mailto:privacy@perimeter.ca)

The Privacy Officer can provide to individuals who request it specific information about the management of personal information and Perimeter's policies and practices.

Upon request to the Privacy Officer, Perimeter will inform an individual of the existence, use and disclosure of that individual's personal information and give access to that information, subject to PIPEDA. If you challenge the accuracy or completeness of your personal information, Perimeter will amend the information it has collected where it is appropriate to do so.

## **Policy Changes**

In the event that Perimeter makes changes to this Policy, the changes will not impact the safeguarding of your personal information or its use. Changes to this Policy will be made available on Perimeter's website at [www.perimeter.ca](http://www.perimeter.ca).