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THE ULTIMATE HOCKEY AND SUMMER CAMP EXPERIENCE.

Title: Employee Privacy Policy
Revised: March 9, 2026
Signed & Approved by:

Kevin McLaughlin, Owner & Executive Director

This policy can be made available in an accessible format upon request.

Objective

Hockey Opportunity Camp (HOC) is committed to maintaining the privacy of our employees, guests, and associated persons.

Applicability

This policy applies to all employees of Hockey Opportunity Camp.

Policies

Scope & Overview

Hockey Opportunity Camp is committed to maintaining the accuracy, confidentiality and security of your personal information. HOC (“we” or “us”) has adopted this Employee Privacy Policy to address the specific privacy concerns of individuals who seek to be, are, or were employed by HOC in Ontario (collectively, referred to as "employees").

This Privacy Policy describes the categories of personal information that we collect, how we use your personal information, how we secure your personal information, when we may disclose your personal information to third parties, and when we may transfer your personal information outside of Canada. This Privacy Policy also describes your rights regarding the personal information that we hold about you and how you can access, correct, and request the erasure of your personal information.

We will only use your personal information in accordance with this Privacy Policy unless otherwise required by applicable law. We take steps to ensure that the personal

information that we collect about you is adequate, relevant and used only for the limited purposes that we have identified.

Collection of Personal Information

For purposes of this Privacy Policy, personal information means any information about an identifiable individual, as may be defined or limited under applicable privacy legislation. Personal information excludes anonymous or de-identified data that is not associated with a particular individual. Personal information also excludes business contact information and job title that is used to communicate with an individual in relation to his or her employment, business or profession. Personal information includes information such as name, home address, telephone, personal email address, date of birth, employee identification number and marital status, and any other information necessary to HOC's business purposes, which is voluntarily disclosed in the course of an employee's application for and employment with HOC.

To carry out our activities and obligations as an employer, we may collect, store, and use the following categories of personal information, which are required for us to administer our employment relationship with you:

- information contained in cover letter(s), resume(s) and/or application form(s);
- education and training (including professional memberships, certifications and designations)
- employment records (including references, work history, and proof of work eligibility).
- references and interview notes;
- letters of offer and acceptance of employment (including start date and location of employment);
- start date and location of employment;
- mandatory policy acknowledgement sign-off sheets;
- government identification numbers such as social insurance or other national insurance numbers, driver’s license numbers, or other identification card numbers;
- payroll information, including bank account details and pay deposit information;
- wage and benefit information; including compensation history;
- forms relating to the application for, or in respect of, changes to insurance enrolment and employee health and welfare benefits (including short and long-term disability, medical and dental care);
- beneficiary and emergency contact information;
- performance information; and

- employee photographs and/or video.

Use of Personal Information

We only use your personal information where applicable law permits or requires it, for example, when necessary for the performance of our employment contract with you, or when the use is necessary to comply with a legal obligation that applies to us as your employer. We may use your personal information for the following, but not limited to, legitimate business purposes:

- Employee administration (including payroll and benefits administration);
- Business management and planning, including internal administration with our affiliated entities;
- Processing employee work-related claims (for example, insurance and workers' compensation claims);
- Accounting and auditing;
- Conducting performance reviews and determining performance requirements;
- Assessing qualifications for a particular job or task;
- Gathering evidence for disciplinary action or termination;
- Education, training, and development requirements;
- Health administration services;
- Complying with applicable legal requirements and
- Fulfilling our health and safety obligations;

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for an unrelated purpose, we will provide notice to you and, if required by law, seek your consent. We may use your personal information without your knowledge or consent where permitted or required by applicable law or regulation.

Data Sharing

We will only disclose your personal information to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require it to assist us with administering the employment relationship with you. This includes third-party service providers who provide services to us or on our behalf.

Third-party service providers include our provider of camp management software as a service, recruitment service providers and employment record management and payroll

software as a service (SaaS) providers. We also utilize a third-party service provider to carry out background checks, in accordance with our *Background Check Policy*.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal information consistent with our policies and any data security obligations applicable to us as your employer. We do not permit our third-party service providers to use your personal information for their own purposes or to communicate your personal information to third parties without consent, subject to limited exceptions. We only permit them to use your personal information for specific purposes in accordance with our instructions.

We may also disclose your personal information for the following additional purposes where permitted or required by applicable law:

- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. (When we disclose your personal information to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal information necessary for the specific purpose and circumstances).
- During emergencies or where necessary to protect the safety of persons;
- Where the personal information is publicly available;
- If a business transfer or change in ownership occurs, and
- For additional purposes with your consent, where such consent is required by law.

Cross-Border Data Transfers

Some of our service providers may access, process or store your personal information outside of Canada. We use reasonable safeguards, such as contractual requirements, to ensure that our service providers protect your personal information wherever it is used or stored. Whenever your personal information is used or stored in a jurisdiction other than Canada, it may be subject to the law of this foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

Data Security

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal information against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit personal

information access to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances, we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. Once you are no longer an employee of the company, we will retain and securely destroy your personal information in accordance with our *Document Retention Policy* and applicable laws and regulations.

Rights of Access, Correction, Erasure and Obligation

The personal information we hold about you must be accurate and current. Please keep us informed if your personal information changes during your employment. If you would like to review, verify or correct your personal information, please contact us in writing. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made some or all of your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Right to Withdraw Consent

Where your consent was required for our collection, use or disclosure of your personal information, you may, under certain circumstances and subject to legal or contractual restrictions and reasonable notice, withdraw your consent. A request to withdraw your consent should be in writing and addressed to our Privacy Officer.

Privacy Officer

We have appointed a Privacy Officer, Sophie McLaughlin, to oversee compliance with this Privacy Policy. If you have any questions about this Privacy Policy or how we handle your personal information, or would like to request access to your personal information, please contact the Privacy Officer at: privacy@learnhockey.com

Changes to This Privacy Policy

We reserve the right to update this Privacy Policy at any time, and we will provide you with a new Privacy Policy when we make any updates. If we would like to use your previously collected personal information for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent before using your personal information for a new or unrelated purpose. We may use your personal information without your knowledge or consent where required or permitted by applicable law or regulation.

Contact Us

Hockey Opportunity Camp
Box 448
Sundridge, ON
P0A 1Z0
Attention: Privacy Officer
705-386-7702