



## Privacy Policy

---

*The Spa Ritual* has created this Privacy Policy in order to demonstrate our firm commitment to guest privacy. *The Spa Ritual* manages the collection, use and disclosure of personal information in accordance Alberta's *Personal Information Protection Act* ("PIPA") and all applicable privacy laws. The purpose of this policy is to outline the practices *The Spa Ritual* follows in protecting and managing personal information.

### **Accountability**

*The Spa Ritual* has appointed a Privacy Officer who is responsible for ensuring compliance with the requirements of PIPA and all applicable privacy laws. Should you have any questions regarding this Privacy Policy or concerns with respect to *The Spa Ritual's* compliance with PIPA and applicable privacy laws, you may contact our Privacy Officer, The Spa Director, at *The Spa Ritual*, 106 Crowfoot Terrace NW, Calgary, Alberta, T3G 4J8.

### **Identifying Purpose of Collection**

*The Spa Ritual* only collects personal information that is necessary for operating its business and for providing services to its guests, including personal information needed:

- To assess whether treatments are suitable and the use of our facilities are appropriate for your current health condition;
- To identify any factors suggesting that you should not undertake treatments/activities;
- To identify any cardiovascular or respiratory health issues you may have prior to using our facilities;
- To identify whether you have any head or neck injuries that would increase your risk of injury during treatment;
- To identify whether you have any infectious diseases which may adversely affect our team members or other guests;
- To identify situations where the use of certain medications may potentially cause adverse effects in combination with specific treatments;
- To ensure that you are aware of the risks involved with the use of the facilities;
- To assist our team members in assisting you should an injury occur;
- To contact your personal physician should it become necessary to do so in order to protect your health and the health of other guests;
- To ascertain whether or not you are pregnant, as some treatments may have adverse effects on your unborn child;
- To provide to qualified medical personnel in the case of an emergency;
- To ensure we understand needs and preferences of guests; managing and developing business and operations.

*The Spa Ritual* does not disclose your personal information to any third party to enable them to market their products and services to you. Your written consent will be required to release any personal information, save and except where it is necessary to seek, arrange for or provide immediate medical attention.

While we do collect and use your personal information for the above purposes, we are not responsible for ensuring you maintain a requisite level of health to use the facilities or



## Privacy Policy

---

undertake any particular activity or treatment, nor do we provide medical advice or diagnosis. All users of *The Spa Ritual's* treatments and experiences do so at their own risk and should consult their physician before undertaking any particular activity or changing the level of physical activity.

*The Spa Ritual* will limit the collection of your personal information to the purposes expressly set out above. In addition, *The Spa Ritual* may use your personal information for purposes of compiling statistical data on usage of facilities and health issues experienced by guests so that we may better tailor our treatments and facilities to the needs of our guests. If this information is used for statistical purposes it will be done so in a way that the aggregate data contains no references to individual guests.

### Consent

When you complete the Health History Form, the fact of your doing so gives *The Spa Ritual*. your express consent to use the information you provide for the purposes set out in the section of this Privacy Policy on Identifying Purpose of Collection. You may withdraw your consent at any time simply by indicating in writing and delivering to *The Spa Ritual*. your intention to withdraw consent. Please be advised however, if you withdraw your consent for us to use your personal information, we may be forced to deny certain treatments to you in the future where to offer such treatments without accurate personal information with respect to your health would present a potential health or safety risk to yourself, our team members or other guests.

### Limiting Use, Disclosure and Retention

Personal information shall not be used or disclosed for any purposes other than those for which it is collected, save and except with the written consent of the Guest, for the purposes set out in this Privacy Policy, for the purposes of providing emergency medical treatment, or as required by law. For example, we may be required by law to provide certain information if a court issues a subpoena or summons or where there is an investigation by a regulatory body.

Personal information shall be retained only as long as necessary for the fulfillment of the purposes set out above, or as required by law.

### Accuracy

You will have the opportunity to update your Health History Form before treatments are rendered. It is your responsibility to ensure that your Health Information is up-to-date and complete. As we may use this information to assess whether it would appear that you are medically fit to obtain certain treatments, it is important that you regularly update your Health Information. We request that you immediately inform us of any change in your physical or mental condition, or copy of medications or drugs you are taking prior to obtaining any treatments or using the facilities.

### Safeguards

*The Spa Ritual* takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:



## Privacy Policy

---

- premises security;
- restricted file access to personal information; and
- technological safeguards such as security software and firewalls to prevent 'hacking' or unauthorized computer access.

### **Openness/Individual Access**

With certain limited exceptions, you have a right to access your personal information at any time. You may access your personal information by contacting The Spa Director of *The Spa Ritual* during normal business hours.

### **Challenging Compliance**

If you have any questions or concerns about our Privacy Policy, you may address your concerns to our Privacy Officer (see above under the heading "Accountability"). If you are not satisfied with our response, you may contact the Office of the Information and Privacy Commissioner of Alberta.

### **Changes to Our Privacy Policy**

*The Spa Ritual* reserves the right to modify this Privacy Policy at any time, so please review it frequently. If we make material changes to this policy we will attempt to notify you by placing the information on our website, at our Front Desk and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.