



# Holstein Canada Privacy Policy

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Holstein Canada values its relationship with its customers and employees, and is committed to the protection of their Personal Information. Accordingly, Holstein Canada adheres to the privacy principles, and accompanying commentary, set out below (the "Privacy Principles"). The Privacy Principles are based on the principles set out in the Schedule 1 of the *Personal Information and Protection and Electronic Documents Act* (Canada) (the "Act"). "Personal Information", as used in this Policy, means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization.

## Principle 1 – Accountability

Holstein Canada is responsible for all Personal Information under its control.

Accountability for our compliance with the Privacy Principles rests with our Chief Privacy Officer, even though other individuals within Holstein Canada have responsibility for the day-to-day collection and processing of Personal Information and may be delegated to act on behalf of the Chief Privacy Officer.

We are responsible for Personal Information in our possession or custody, including information that has been transferred to a third party for processing. We will use contractual or other means to provide a comparable level of protection when the information is to be processed by a third party.

## Principle 2 – Identifying Purposes

We will identify and document the purposes for which we collect, use, or disclose Personal Information at or before the time of collection.

The purposes will be limited to those which are related to our business and which a reasonable person would consider are appropriate in the circumstances. We collect, use, and disclose Personal Information concerning our customers for the following reasons:

1. to enable Holstein Canada to serve members and customers presently and in the future
2. to ensure that client and animal information is accurate and up-to-date to maintain herdbook integrity
3. to enable Holstein Canada to acquire or renew memberships
4. to allow Holstein Canada to conduct its business in accordance with the By-laws
5. to share with designated industry partners in providing service to dairy producers

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6. to publish awards and recognition of superior accomplishment and genetic ranking lists (top 100 LPI list)

We collect, use, and disclose Personal Information concerning our employees for the following reasons:

- ❖ to assist Holstein Canada in employee management including, but not excluded to:
  - Personal and Administrative Information
  - Benefit enrollment & calculation
  - Employment & Pay Equity data
  - Health & Safety and Grievance / Disciplinary Incidents
  - Employment & salary history
  - Performance Appraisals & Succession Planning

Personal Information **will not be sold** to third party agencies. Holstein Canada considers privacy part of the Business Ethics that governs Board Directors and staff. The Association's Code of Conduct states Board Directors and staff will "*maintain appropriate confidentiality about the dealings of Holstein Canada.*"

If we plan to use Personal Information we have collected for a purpose not previously identified, we will identify and document this purpose before such use.

We will make a reasonable effort to specify the identified purposes, orally or in writing, to the individual from whom the Personal Information is collected either at the time of collection or after collection but before use. We will state the identified purposes in such a manner that an individual can reasonably understand how the information will be used or disclosed.

### Principle 3 – Consent

**Personal Information will only be collected, used, or disclosed with the knowledge and consent of the individual, except where inappropriate.**

The way in which we seek consent, including whether it is expressed or implied, may vary depending upon the sensitivity of the information and the reasonable expectations of the individual. An individual can withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. We will inform individuals of any implications of withdrawing consent.

Consent may be obtained in a variety of ways, for example, through an application form, orally by telephone or by electronic media, depending on the circumstances and the type of personal information being collected, and in particular, on the sensitivity of the Personal Information. For example, where customers provide their names and addresses for mailing and billing purposes, they should reasonably expect that this information would also be used to provide more information regarding the products

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and services of Holstein Canada. Information provided to Holstein Canada may be shared with trustworthy business and industry partners who sign an agreement that ensures respect for your privacy.

Typically, we will seek consent for the use or disclosure of information at the time of collection. In certain circumstances, consent may be sought after the information has been collected but before use (such as where we want to use information for a purpose not previously identified).

We will not, as a condition of the supply of services, require an individual to consent to the collection, use, or disclosure of Personal Information beyond that required to fulfill the explicitly specified and legitimate purposes.

In certain circumstances, as permitted or required by law, we may collect, use or disclose Personal Information without the knowledge or consent of the individual. These circumstances include: Personal Information which is subject to solicitor-client privilege or is publicly available as defined by regulation; where collection or use is clearly in the interests of the individual and consent cannot be obtained in a timely way; to investigate a breach of an agreement or a contravention of a law; to act in respect to an emergency that threatens the life, health or security of an individual; for debt collection; or to comply with a subpoena, warrant or court order.

### **Principle 4 – Limiting Collection**

We will limit the amount and type of Personal Information collected to that which is necessary for our identified purposes and we will only collect Personal Information by fair and lawful means.

### **Principle 5 – Limiting Use, Disclosure, and Retention**

Personal Information will not be used or disclosed for purposes other than those which it was collected, except with the consent of the individual or as required by law. Personal Information will be retained only as long as necessary to fulfill the identified purposes.

Personal Information which has been used to make a decision about an individual will be retained long enough to allow the individual access to the information after the decision has been made and, in the event of an access request or a challenge, long enough to exhaust any recourse an individual may have under the law. Where Personal Information is no longer required to fulfill the identified purposes, it will be destroyed, erased, or made anonymous.

If we were ever to sell all or a portion of our business, it may be necessary to allow a prospective purchaser, under strict terms of confidentiality, to have limited access to some confidential Personal Information while conducting a due diligence investigation of the Company in the ordinary course of business.

### Principle 6 – Accuracy

We will use our best efforts to ensure that Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

We will use our best efforts to ensure that Personal Information that is used on an ongoing basis, including information that is disclosed to third parties, and information that is used to make a decision about an individual, is accurate, complete, and up-to-date.

### Principle 7 – Safeguards

We will protect Personal Information with safeguards appropriate to the sensitivity of the information.

#### How do we protect your information?

Our safeguards will protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held. We will make our employees aware of the importance of maintaining the confidentiality of Personal Information to prevent unauthorized parties from gaining access to the information.

Our methods of protection will include physical measures (for example, locked filing cabinets and restricted access), organizational measures (for example, security clearances and limiting access on a “need-to-know” basis), and technological measures (for example, use of passwords and encryption).

#### How can you help protect your information?

If you are using Holstein Canada’s web site for electronic services for which you are registered and chose a password, we recommend that you do not divulge your password to anyone. We will never ask you for your password in an unsolicited phone call or in an unsolicited email. Also remember to sign out of the registered site and close your browser window upon completing your transactions. This is to ensure your Personal Information and correspondence cannot be accessed.

#### Other Sites

Holstein Canada’s web site contains links to other sites, including those of industry partners. While we seek to link only to sites that share our high standards and respect for privacy, we are not responsible for the privacy practices employed by other organizations.

### **Principle 8 – Openness**

We will make specific information about our policies readily available, except to the extent this is confidential commercial information.

The information we will make available will include: how to gain access to Personal Information; the type of Personal Information held by us, including a general account of its use; general information concerning our Policy; what Personal Information is made available to related companies; and how to contact our Chief Privacy Officer.

### **Principle 9 – Individual Access**

Upon written request, we will inform an individual of the existence, use, and disclosure of his or her Personal Information and we will give the individual access to that Personal Information. An individual can challenge the accuracy and completeness of his or her Personal Information and have it amended as appropriate.

We will respond to an individual's written request within a reasonable time (generally within 30 days). We will assist any individual who informs us that they need assistance in preparing a request. We may require an individual to provide sufficient information to permit us to provide an account of the existence, use, and disclosure of Personal Information. While our response will typically be provided at no cost to the individual, depending on the nature of the request and the amount of information involved, we reserve the right to impose a cost. In these circumstances, we will inform the individual of the approximate cost to provide the response and proceed upon payment by the individual of the cost. Requested information will be provided or made available in a form that is generally understandable. Where possible, we will indicate the source of the information.

In providing an account of third parties to which we may have disclosed Personal Information about an individual, we will attempt to be as specific as possible. When it is not possible to provide a list of the organizations to which we have actually disclosed Personal Information, we will provide a list of organizations or types of organizations to which we may have disclosed the information.

If an individual successfully demonstrates the inaccuracy or incompleteness of Personal Information, we will amend the information as required. If a challenge is not resolved to the satisfaction of the individual, we will record the substance of the unresolved challenge. Where appropriate the amended information or the existence of the unresolved challenge, as the case may be, will be transmitted to third parties having access to the information in question.

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In certain situations, we may refuse a request or not be able to provide access to all the Personal Information we hold about an individual. Exceptions to the access requirement will be limited and specific, as permitted or required by law. Where

permitted, the reasons for denying access will be provided to the individual upon request. Exceptions may include: information that contains references to other individuals or contains confidential commercial information, where such information cannot be severed from the record; information collected in the course of investigating a breach of an agreement or in the course of a formal dispute resolution process; and information that is subject to solicitor-client privilege.

### **Principle 10 – Challenging Compliance**

**Any individual can address a challenge concerning our compliance with any of the Privacy Principles to our Chief Privacy Officer.**

We will investigate all written complaints. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.

#### **Contact Information:**

Any question, concern or complaint regarding compliance with our Privacy Policy should be addressed to our Chief Privacy Officer:

Chief Privacy Officer  
Holstein Canada  
P.O. Box 610,  
Brantford, ON  
N3T 5R4  
Phone: 519-756-8300  
Fax: 519-756-5878  
Email: [privacyofficer@holstein.ca](mailto:privacyofficer@holstein.ca)