

SUBJECT: Privacy Policy	POLICY # IT3
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EFFECTIVE DATE: January 2019	APPROVAL:
REVISION DATE:	
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1. *Policy Standard*

1.1 Purpose

This policy explains how DLF PICKSEED CANADA will manage all personal information from any source in accordance with Applicable Privacy Laws.

DLF PICKSEED CANADA is committed to ensuring that the privacy of personal information is protected and we strive to uphold the best practice privacy standards in the collection, storage and use of personal information.

1.2 Definition

Personal Information means any information about an identifiable individual.

1.3 Scope

This Privacy policy applies to personal information held by DLF PICKSEED CANADA. Applicable Privacy Laws and this privacy policy do not apply to information we hold about companies and other organizations, as such information does not constitute personal information under Applicable Privacy Laws. However DLF PICKSEED CANADA does keep completely confidential all information that we hold about companies and other organizations regarding their strategies, business affairs, accounts, finance or contractual arrangements.

This Privacy policy covers the collection, use and disclosure of personal information about:

- DLF PICKSEED CANADA customers, suppliers and third parties;
- Directors and Officers of DLF Group;
- Employees (full time and part time);
- Temporary and Casual employees;
 - Independent contractors (i.e. sales agents, area supervisors, etc)
- Third party contractors e.g. consultants; and
- The DLF Pickseed Canada Group (i.e. associated companies over which DLF PICKSEED CANADA has significant influence, including Mapleseed and DLF Moore Seed).

1.4 Applicable Privacy Laws

The Applicable Privacy Laws can be viewed at the links below:

Personal Information Protection and Electronic Documents Act <https://laws-lois.justice.gc.ca/eng/acts/P-8.6/>

Personal Information Protection Act (Alberta) <http://www.qp.alberta.ca/documents/Acts/P06P5.pdf>

Personal Information Protection Act (BC) http://www.bclaws.ca/civix/document/id/complete/statreg/03063_01

Act respecting the protection of personal information in the private sector <http://legisquebec.gouv.qc.ca/en/ShowDoc/cs/P-39.1>

How DLF PICKSEED CANADA complies with the Applicable Privacy Laws is set out in this privacy policy.

1.5 Personal information that we collect, and why

We collect personal information from our website visitors, customers, suppliers, employees and third party service providers as described more fully below. Personal information collected by DLF PICKSEED CANADA is collected for the purpose of managing customer transactions for products and services, supplier and other third party relationships, and employee relationships.

We also sometimes collect information about people who are not our employees or customers as part of providing a product or service, for example the other party to a sales transaction that you are involved in.

The personal information that we collect differs depending on which of our products and services you are involved in, and may include:

- name, address and contact details
- date of birth
- gender
- account and newsletter preferences
- for employees, all employment related information
- for customers, information about a product or service you purchased from or sold to us, the place of purchase and information about your ownership of the product
- information about any call to us, including a recording of the call, details about the product(s) you bought, the reason why you contacted us and the advice we gave you
- information relating to your use of any of our loyalty programs and the rewards that you claim
- information about third party provider products that you obtain through us i.e. fuel cards
- your business contact details and other business information, place of employment and position
- product reviews, comments, photos and forum posts that you have submitted
- credit and financial information and checks, including validation of identity and property ownership
- information about your social network profile such as your social network ID, profile picture, gender and location
- the fact that you have clicked on a 'like' or 'tweet' or similar button in one of our websites or services or one of our pages on a social network site, which we may associate with the details that we store about you
- information about your visit to our website, such as your browser software, which pages you view and which items you 'clicked' on
- service, product or server logs, which hold technical information about your use of our service, product or websites, such as your IP address, domain, device and application settings, errors and hardware activity
- information about where your device is physically located (for example, when you are using a geo--location service or application and you have provided consent to your location being shared)
- interests and preferences that you specify during setup of an Internet enabled product or service
- in the case of candidates seeking employment with us, and our employees, information relevant to your employment history.

We require the above noted information in order to offer our products and services. If we request personal information from you and you do not supply it, we may not be able to provide you with the product or service you request.

1.6 How we collect personal information

Whenever possible, we collect personal information directly from you. Collection occurs when you first apply or request a product or service from us or start work with us. Also, during the course of our relationship with you we may continue to collect personal information from you. Information may be collected in various ways, such as by mail, internet, telephone, face-to-face conversation, email, and in various formats such as forms, letters, electronic file notes and recorded conversations. Customers will be identified by a DLF PICKSEED CANADA customer number and password (if applicable). Employees will be identified by a DLF PICKSEED CANADA employee number and password (where applicable).

We may also collect personal information about you from other people, organizations and sources, where you have consented to us collecting it from someone else, either explicitly or implicitly in accordance with Applicable Privacy Laws. These may be parties related to DLF PICKSEED CANADA or third parties such as your agent, where you have appointed an agent to act on your behalf in dealings with us (e.g. a broker or lawyer), or employment references that prospective employees have given us.

1.7 Where we store personal information

DLF PICKSEED CANADA stores customer and employee personal information in a number of locations, including:

- DLF PICKSEED CANADA's computer systems, various equipment, programmes, databases and digital archives when we scan customer and employee documentation
- Secure filing cabinets for storage of physical paperwork
- On secure third party cloud-hosted providers for storage of electronic files

These storage mechanisms may be managed internally by DLF PICKSEED CANADA and held locally in Canada, or they could be managed by a third party storage provider with whom DLF PICKSEED CANADA has a contractual relationship and be held on a server locally.

1.8 DLF PICKSEED CANADA's storage security procedures

DLF PICKSEED CANADA will take reasonable steps to safeguard your personal information against loss, misuse and disclosure, such as:

- following certain procedures, for example checking your identity against available data when you telephone us and using
- secure passwords for our computer systems
- limiting physical access to DLF PICKSEED CANADA's premises
- limiting access to personal information to those who specifically need it to conduct their business responsibilities
- entering into contracts with our third party providers to ensure they have acceptable security measures to keep personal information secure
- putting in place physical, electronic, and procedural safeguards in line with industry standards; and
- destroying personal information pursuant to the law and our record retention policies.

DLF PICKSEED CANADA cannot guarantee that your personal information cannot be accessed by an unauthorized person (e.g. a hacker) or that unauthorized disclosures will not occur. If we provide you with any passwords or other security devices it is important that you keep these secret and confidential and do not allow them to be used by any other person. Please notify us immediately if the security of these devices is breached to prevent the unauthorized disclosure of your personal information.

1.9 Keeping personal information complete, up to date and accurate before we use it

Prior to using any personal information about our customers or employees, DLF Pickseed will take reasonable steps to ensure that the information is up to date, complete, relevant and not misleading.

If you believe that any of the personal information that we hold about you is not accurate, complete or up-- to--date, please let us know.

1.10 How long we can keep personal information

DLF PICKSEED CANADA will keep personal information about customers or employees for as long as they continue to hold that relationship with DLF PICKSEED CANADA.

Thereafter, personal information will be retained for six years of the termination of the relationship (but will not be used), unless a different retention period is required by law.

1.11 What we use personal information for

Your personal information may be used by DLF PICKSEED CANADA in association with any past sales that may be used for future sales opportunities to you, transactions, interactions or proposals between DLF PICKSEED CANADA and the customer or employee including to:

- identify you when you telephone us to make an enquiry. For example, we may ask for your date of birth so that we can avoid disclosing information to a person who is not authorized by you to receive it
- contact you about any services and products provided by us previously, now or in the future
- help prevent or detect fraud or loss
- contact you by any means, including mail telephone or email (if you have opted in to such communications) in relation to a particular service or product
- contact you for research/feedback purposes
- make changes to your DLF PICKSEED CANADA account details
- provide you with a product or service you have requested, including checking that a payment is not made fraudulently, delivering your purchase to you or ensuring that you benefit from any relevant special offer or promotion

- train staff and for quality assurance purposes
- obtain opinions or comments about DLF PICKSEED CANADA products and/or services, including conducting product surveys
- respond to your requests for information when you contact us about DLF PICKSEED CANADA and its products and services
- conduct prize draws, contests and other promotional offers
- consider employing you if you contact us via one of DLF PICKSEED CANADA's job application website
- record statistical data for marketing analysis
- manage employee information, including using it for human resources, payroll and health and safety matters, and data--matching.

1.12 When we can disclose personal information

DLF PICKSEED CANADA will not disclose your personal information to a third party unless:

- it is disclosed to achieve one of the purposes for which the information has been collected (for example to undertake a credit check for the purpose of processing an application for credit, or for bank transaction business);
 - it is disclosed to the customer or a person authorized by the customer;
 - it is necessary to enable a sale of DLF PICKSEED CANADA's business;
 - it is necessary to prevent a serious or imminent threat to public health or safety;
 - it is authorized by the Privacy Commissioner;
 - the personal information is publicly available;
 - it is necessary to avoid prejudice to the maintenance of law; or
 - the information will not be used in a form which identifies you.(as is otherwise permitted by Applicable Privacy Laws)

In general, DLF PICKSEED CANADA does not sell, rent or otherwise disclose information about you to third parties without your consent. However, there are exceptions. DLF PICKSEED CANADA may disclose your personal information to third party service providers so that they can provide certain contracted services to DLF PICKSEED CANADA, such as IT support or programming, hosting services, telephone services, fulfilling orders, delivering packages, mailing or sending of documents to you electronically or otherwise, processing payments and providing fraud checking services.

We prepare anonymous, aggregate or generic data (including "generic" statistics) for a number of purposes, including for product and service development, business promotion and research purposes. As such information is not personal information within the meaning of Applicable Privacy Laws, we may share it with any third party (such as our suppliers, advertisers, industry bodies, the media and/or the general public).

1.13 How you can access your personal information

You are entitled to confirmation from DLF PICKSEED CANADA as to whether we hold your personal information and are entitled to request a copy of that personal information. We will endeavor to provide access within 30 days if it is readily retrievable.

To protect the privacy of our customers, DLF PICKSEED CANADA will verify the identity of customers seeking access to their personal information.

Any requests from outside of DLF PICKSEED CANADA for access to personal information should be made to the Privacy Officer at rsmeall@dlfpickseed.com . Any requests made by an agent on your behalf (such as a lawyer or broker) must be accompanied by a written authority from you authorizing that particular agent to act on your behalf.

Any requests from DLF PICKSEED CANADA employees for access to personal information should be made to the Payroll Administrator.

Notwithstanding the above, pursuant to Applicable Privacy Legislation, there are circumstances under which we may refuse to allow you access to some or all of your personal information. In such cases, we will give you a reason for our decision.

1.14 Correcting personal information

Individuals have the right to request access to personal information we hold about them, as noted in the preceding section, and to request us to correct any inaccurate, out--of--date, incomplete, irrelevant or misleading personal information.

If you think that any information we hold about you is incorrect or incomplete, please contact Privacy Officer at rsmeall@dlfpickseed.com

1.15 Unique identifiers

A “unique identifier” is a tag that does not use the individual’s name. DLF PICKSEED CANADA will only assign a unique identifier (i.e. a customer account number or employee number), if this is necessary to enable us to carry out our functions effectively.

1.16 DLF PICKSEED CANADA mailing lists

DLF PICKSEED CANADA may use your information to provide you with newsletters and other communications by post, email, telephone and/or text message, if you have provided your prior consent or we are otherwise permitted to do so under applicable law.

You can change your marketing communication preferences at any time:

- if you would like to unsubscribe from an email sent to you, follow the 'unsubscribe' link and/or instructions placed (typically) at the bottom of the email. But note that:□
- if you use more than one email address to contact DLF PICKSEED CANADA, you will need to unsubscribe separately for each email address; and
- this method will only unsubscribe for the newsletter or other communication that you have received and you should use
- one of the other methods if you wish to opt--out of all our marketing communications,
- you can contact us at any time to change your marketing communication preferences.

1.17 DLF PICKSEED CANADA’s website

From time to time, DLF PICKSEED CANADA may enable third parties to advertise on its websites. If you click the link then you will leave our website and be navigated to the third party’s website. The website privacy policy of that third party applies, and DLF PICKSEED CANADA accepts no liability for breaches of privacy once such a link has been followed.

DLF PICKSEED CANADA’s website collect the domain names, not the email addresses of visitors. Our web server may require you to place a “cookie” (small data file) on your computer’s hard drive, in order to track statistical information about navigation to and throughout certain areas of the site. If you are just surfing and reading information on our website, then we collect and store the following information about your visit:

- the IP address of your machine when connected to the Internet and the domain name from□
- which you are accessing the Internet
- the operating system and the browser your computer uses, and any search engine you are using□
- the date and time you are visiting
- the URLs of the pages you visit
- if you provide it, your email address We use that information to measure the number of visitors to different parts of the site and, for example, to measure the effectiveness of advertising. Although we may publish aggregated information about usage patterns, we do not disclose information about individual machines except for the reasons set out below in this section. We do not sell information which identifies you personally. We may gather more extensive information if we are concerned, for example, about security issues. If we think it is necessary, we can disclose information to relevant law enforcement authorities, such as the Police.
- Some of our online services may allow you to upload and share messages, photos, video and other content and links with others and/or create a publically accessible profile for your account. For example:
 - the communities and forums area of our websites, allows you to post comments (with your account name), which are visible to other users of that service; and
 - other services allow you to share a link which if clicked on may allow the recipient to access your uploaded content.

You should not expect any information that you make available to others via DLF PICKSEED CANADA's online services to be kept private or confidential. Content and links that you share might, for instance, be forwarded by your recipients to others. You should always exercise discretion when using such services.

1.18 Monitoring communications

DLF PICKSEED CANADA may monitor and record communications we receive, including recording and storing phone calls. This may be done for quality and training purposes to improve the service that we provide, to ensure compliance with our practices and procedures and/or to provide evidence of a transaction such as where a contract is entered into, or a claim is made.

2. Clarification and Breaches

2.1 Clarification

Questions, concerns, complaints, information on third party service providers or clarification of this policy can be obtained from:

Privacy Officer c/o Rick Smeall, 1 Greenfield Road Lindsay ON K9V 4R1 rsmeall@dlfpickseed.com

2.2 Breaches of policy

We will notify you of any breach of our security safeguards to the extent required by Applicable Privacy laws.

If you want to report a suspected breach of your privacy or you do not agree with a decision regarding access to your personal information, please contact us. We have an internal complaints process to address such issues and will promptly acknowledge and investigate complaints. For more information, please see our [Privacy Breach Management Policy](#).

Any inquiries or complaints can be made direct to the Privacy Officer c/o Rick Smeall, 1 Greenfield Road Lindsay ON K9V 4R1 rsmeall@dlfpickseed.com