OUR COMMITMENT

In this Privacy Policy, "we", "us", "our", "ours" and “KAP” means Keystone Agricultural Producers Inc., and "you" means (and “your” refers to) anyone who provides personal information to us.

We have adopted this Keystone Agricultural Producers Privacy Policy (this "Privacy Policy") to explain how we will meet our responsibilities with respect to the personal information you provide to us. This Privacy Policy applies to both individuals and organizations, from whom we collect personal information.

The principles that form the basis of this Privacy Policy are interrelated and KAP adheres to all the principles as a whole. Each principle should be read in conjunction with the accompanying commentary. As permitted by the Personal Information Protection and Electronic Documents Act ("PIPEDA"), the commentary in this Privacy Policy has been drafted to reflect privacy issues specific to KAP.

KAP will continue to review this Privacy Policy to make sure that it remains current with exceptions, changing technologies, industry standards and applicable laws. We may revise this Privacy Policy, at any time, by updating this posting. We may provide notice to you of material revisions by means of a general notice on our website. Your continued use of our services after such revisions are posted will signify your agreement to these revised terms. Therefore, you should visit this page periodically to review this Privacy Policy.

1. Scope and application

This Privacy Policy applies to personal information, in any form, collected, used or disclosed by KAP in the course of commercial activities.

This Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by KAP:

- information about an individual that is publicly available and is specified by regulation pursuant to PIPEDA;
- personal information that is not collected, used or disclosed, for commercial purposes;
- non-personally identifiable information; and
- the name, title, business address or telephone number of an employee of an organization, where collection, use or disclosure of such information is solely for the purpose of communicating with the person about his or her employment, business or profession.
The application of this Privacy Policy is subject to the requirements and provisions of PIPEDA, and any other applicable legislation or regulation. If you reside in British Columbia, Alberta or Québec, then the substantially similar provincial privacy law of your province will apply to our handing of your personal information, rather than PIPEDA. In that case, reference in this Privacy Policy to PIPEDA shall be deemed to include your province's substantially similar privacy law.

2. Definitions

collection: The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

consent: Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. The form of consent we seek may vary, depending upon the circumstances and the type of personal information. In determining the form of consent, we consider the sensitivity of the personal information and your reasonable expectations. Consent may be provided directly by you, or by your authorized representative, in accordance with applicable law.

disclosure: Making personal information available to a third party.

employee: An employee of, or an independent contractor to, KAP. The inclusion of independent contractors within the definition of "employee" is for convenience of reference only, and should in no manner imply that such independent contractors are our employees within the meaning of employment legislation or are in an employee-employer relationship with us.

personal information: Information about an identifiable individual, but does not include information that is used for the purpose of communicating or facilitating communication with an individual in relation to their employment, business or profession, such as the individual’s name, position name or title, work address, work telephone number, work fax number or work electronic address.

third party: An individual or organization outside of KAP.

use: The treatment, handling, and management of personal information by and within KAP or by a third party with the knowledge and approval of KAP.

we: Means (and "us", "our", and "ours" refer to) KAP.
you: Means (and "your" refers to) the user of our services and products, and your successors, heirs, administrators, executors and assigns (as the case may be).

3. Accountability for our handing of personal information

KAP is responsible for all personal information under its control and has designated the KAP Privacy Officer to oversee privacy compliance. Other individuals within KAP may be delegated to act on behalf of the KAP Privacy Officer or to take responsibility for the day to day management of personal information. KAP trains and communicates with employees about KAP's privacy practices, including this Privacy Policy.

As appropriate, KAP implements privacy policies and procedures to enforce this Privacy Policy, and we use contractual or other means to provide a comparable level of privacy protection while personal information is being processed or used by a third party.

4. Reasons why we collect, use and disclose personal information

KAP collects personal information from you for the following purposes:

- to provide you with information, products, or services that you request from us, including invitations to meetings, legislative updates, newsletters, professional development programs and other services that we make available as part of our member benefits program, from time to time;
- to notify you about changes to any products or services we offer or provide;
- to improve our products or services, marketing, or customer relationships and experiences;
- to measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you;
- to authenticate your identity, such as when you sign into your account;
- to carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal or regulatory requirements;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent, or as required or permitted by law, including, without limitation, The Agricultural Producers' Organization Funding Act.

Further reference to “identified purposes” mean the purposes identified in this section of this Privacy Policy.
We will indicate the identified purposes to you, orally, electronically or in writing, at or before the time your personal information is collected. Persons collecting personal information may explain the identified purposes or refer individuals to a designated person within KAP who can explain these identified purposes.

5. Collection of personal information

We collect no personal information about you unless you choose to provide that information to us. We do not use techniques that collect personal information about anyone without their knowledge. We only collect personal information about individuals when they specifically and knowingly provide it to us, for example when they apply for membership, register for a program or complete a registration form. As a limited exception to this principle, we may collect personal information without your consent, where permitted by PIPEDA and other applicable laws, including, but not limited to, The Agricultural Producers' Organization Funding Act.

If you request information, products, or services from KAP, we will collect your name and contact details, including address(es), mailing preference, telephone and fax numbers, email address, and language preference.

KAP collects and retains information about your transaction history when you use KAP services and various programs.

KAP also provides individuals with an opportunity to specify certain preferences in service delivery, such as special needs requested for a specific event (i.e., meal preference).

You may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. You may contact us for more information regarding the implications of withdrawing consent or to receive a form which can be used for that purpose.

6. Consent for us to contact you about our products and services

The information you provide to KAP – such as your name, address, etc. – allows KAP to inform you about events and activities and to notify you of issues, events or special offers which may be of interest to you. By becoming a member or by requesting information or registering for events or courses offered by KAP, you are giving KAP permission to contact you using the information you provide. Members may choose not to be contacted by KAP. Please email us at kap@kap.ca or send us a message through our website, at https://www.kap.ca/contact-us.

7. Disclosure of personal information

KAP will not disclose personal information for purposes other than those purposes for which it was collected, except with your consent or as required or permitted by law, including, but not
limited to, The Agricultural Producers' Organization Funding Act. KAP may disclose your personal information:

- when we have your consent, whether express or implied;
- to your authorized representatives;
- if and when we are involved in a corporate reorganization or if we sell or lease all or part of our business;
- to meet legal and regulatory requirements; and
- where required or permitted by law.

In such circumstances, we will not disclose more information than is required for the purpose for which the information is being disclosed. We will also, whenever it is reasonable and practicable to do so, enter into privacy agreements with third parties with whom we share personal information.

We will retain personal information only as long as it remains necessary or relevant for the identified purposes or as required or permitted by law. Where personal information has been used to make a decision about you, KAP shall retain, for a period of time that is reasonably sufficient to allow for access by you, either the actual information or the rationale for making such decision.

Only our employees who require access for legitimate reasons or whose duties reasonably so require, are granted access to personal information.

We maintain reasonable controls, schedules and practices for personal information management retention and destruction. Personal information that is no longer necessary or relevant for the identified purposes, or is required by law to be retained, is destroyed, erased, or made anonymous, as appropriate in the circumstances.

8. KAP Website

Cookies

KAP's website uses cookies to customize your experience on our website. A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard drive, making it possible for the website to remember who you are and what your preferences are.

There are different types of cookies. A “session” cookie is erased from memory when a visitor's browser closes. A “persistent” cookie expires based on a time set by the web server. Persistent
cookies help websites identify specific visitors and their preferences when they return to a website.

Disabling or blocking cookies may affect your ability to use our website. If you want to change your cookie preferences, you must change your browser’s preferences to enable/keep, disable/block/restrict, or delete/remove cookies. For the best experience of our website, we recommend enabling cookies. Enabling cookies is handled by your browser’s security settings, which are specific to each browser and operating system. Please check with the company that created your browser if you need more information.

**Website traffic patterns**

Our internet servers may passively and automatically collect certain information about website visitors’ traffic patterns, which may be linked to their Internet Protocol (IP) addresses (which are unique internet “addresses” assigned to all internet users by their internet service providers). Server logs may record statistical information, such as visitors’ IP addresses, type of operating systems, time and duration of visit, pages requested, and identify categories of visitors by items such as domains and browser types. These statistics are generally collected and used on an aggregate basis.

**Other information collected by our website**

- Non-personal information, that does not directly or indirectly reveal your identity or directly relate to an identified individual, such as statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal information. For example, we may aggregate personal information to calculate the percentage of users accessing a specific website feature.
- How you find and access our website, including via direct access, referral from another website or on a mobile device.

**Why do we collect this information?**

The information we collect automatically is statistical information and may include personal information, and we may maintain it or associate it with personal information we collect in other ways, that you provide to us, or receive from third parties. It helps us to improve our website and to deliver a better and more personalized service, including by enabling us to estimate our audience size and usage patterns, and to understand how people are accessing our website.
9. **Accuracy of personal information**

We make reasonable efforts to ensure that personal information we collect, use or disclose is as accurate, complete and up-to-date as necessary for the purposes for which it is to be used. If you find any errors in our personal information holdings, we should be informed using the contact information set out under the Contact Us heading below, so that we can make the appropriate corrections. We will convey these corrections to any third party that may have been provided inaccurate information. For personal information that remains in dispute, we will make note in our records of your opinion as to accuracy of the relevant personal information.

10. **Security of personal information**

KAP endeavours to maintain appropriate safeguards and adequate physical, procedural and technical security with respect to our offices and information storage facilities so as to prevent any unauthorized access, disclosure, copying, use, or modification of personal information. Safeguards include securing physical documents and technological measures by way of secure access and encryption. KAP employees are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. We also take measures to ensure the integrity of this information is maintained and to prevent its being lost or destroyed.

We protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the personal information and the purposes for which it is to be used.

We may engage service providers to assist us with fulfilling the purposes for which personal information has been collected, used and disclosed, and, in some instances, these service providers may be located outside Canada. We only select service providers that protect personal information in a manner that is comparable to the protection we provide under our own privacy policies. However, personal information may be subject to, and accessed under, the laws of the countries in which our service providers operate. If you have any questions about our transfer of personal information to our service providers outside Canada, or if you would like to learn more about our privacy policies in that regard, please contact the KAP Privacy Officer at the contact information provided below.
11. Openness concerning our policies and procedures

We are open about the policies, procedures, and practices we use to protect your personal information. Information about these policies, procedures and practices will be made available to you either electronically or in writing.

12. Access to your personal information

You may access any personal information that we have concerning you, and which has been collected, used, or disclosed for a commercial purpose, by sending a written request to the KAP Privacy Officer. KAP may advise you in advance if there is a minimal charge to conduct a search of our records and will respond within 30 days or advise that the request for access is subject to an extension as authorized by PIPEDA.

To protect your privacy, you may be required to provide sufficient identification, to permit us to account for the existence, use and disclosure of certain personal information and to authorize access to such information. Any such information will only be used for this purpose.

We may not be able to provide personal information to you if doing so would violate the privacy of a third party or if certain personal information is subject to legal privilege, contains information proprietary to us or a third party, is too costly to retrieve, or cannot be disclosed for other legal reasons. If we are unable to provide access to all or part of your personal information, we will explain our reasons for such a decision.

Where you have been provided with access to your personal information, you shall be able to challenge the accuracy and completeness of your personal information and have it amended as appropriate.

Personal information that is disclosed to third parties by us will be subject to the general laws applicable in the jurisdiction in which the third party conducts business. As a result, and in certain limited situations, we may not be legally permitted to account for certain collections, uses or disclosures of personal information. In most circumstances, however, we shall provide an account of the collection, use and disclosure of personal information and, where reasonably possible, we shall state the source of the personal information. In providing an account of disclosure, we shall provide a list of organizations to which we may have disclosed your personal information when it is not possible to provide an actual list.
13. Challenging compliance with privacy laws

All questions or concerns regarding our privacy practices should be directed to the KAP Privacy Officer.

We will investigate all complaints concerning compliance with this Privacy Policy and if a complaint is found to be justified, we will take appropriate measures to resolve the complaint including, if necessary, amending our privacy policies and procedures. We will inform you of the outcome of the investigation regarding your complaint.

14. Contact Us

If you have any questions or concerns about this Privacy Policy or about our information handling practices, please contact us at:

    Keystone Agricultural Producers
    601-386 Broadway Avenue
    Winnipeg, Manitoba R3C 3R6
    Attention: The Privacy Officer
    Email: kap@kap.ca

and/or via telephone at: (204) 697-1140.

Please also visit the Office of the Privacy Commissioner of Canada’s internet web site at https://www.priv.gc.ca/en/.