

SeCan Privacy Policy

SeCan respects your personal privacy. We are committed to meet or exceed the requirements of provincial and federal (PIPEDA) legislation in our collection, storage, use and archival of information. Your personal information is not lent or sold to anyone for any purpose.

This policy outlines the principles and commitments we make to our members, staff and directors to protect their personal information.

Employees are responsible for all personal information in their control. SeCan will assist employees with training as necessary.

Definition of Personal Information

The principal information requested from members is “business contact” information such as names, addresses, telephone and fax numbers. “Personal information” means information about an individual, other than that individual’s name, title, business address or telephone number. Personal information includes age, gender, marital status, health status, financial status, home address, etc.

How do we collect your Personal Information

SeCan shall identify the purposes for which personal information is collected at or before the time the information is collected. We will always collect your personal information by fair and lawful means (for example, when you complete a membership form). We may collect personal information on you from third parties, such as the Canadian Seed Growers Association. We also collect your personal information where we have obtained your consent to do so or as otherwise permitted or required by law.

The personal information SeCan collects may include:

- Contact information (such as name, nicknames, titles, business names, business addresses, email address, work addresses, home, work, fax or cellular telephone numbers)
- Canadian Seed Growers Association (CSGA) membership number
- Acres of each SeCan variety inspected
- Monsanto Dealer certification number
- Monsanto Technology Advantage Partner Number (TAP)
- Seed Sales
- Fees paid
- Other information

How do we Use Your Personal Information?

We identify the purpose(s) for which we use your personal information at the time we collect such information from you and obtain your consent, in any case, prior to use. Some of the primary purposes for which we collect your personal information include:

- Providing services to you in your capacity as a member of our organization
- Responding to inquiries you submit

We may also use your personal information as otherwise permitted or required by law.

When do we Disclose Your Personal Information?

At SeCan, we are accountable for your personal information. We will not sell, license, trade or rent your personal information to, or with, others.

In terms of our accountability to you:

- We are responsible for the protection of the personal information you disclose to SeCan
- We have appointed a Privacy Officer to be accountable for our compliance with our Privacy Policy.
- With your consent, we may share your personal information with third parties engaged to assist us in providing the products and services to you. These service providers will sign *SeCan Confidentiality Agreements* and will be prohibited from using your personal information for any purpose other than to provide a specified service to you as a member of SeCan. They will be required to protect the personal information disclosed by SeCan as we ourselves would do, and to comply with the general privacy principles describes in this Privacy Policy.

Use or Disclosure of your Personal Information for Marketing Purposes

SeCan will never disclose your personal information to a third party marketing firm. However, from time to time SeCan may make use of your personal information, with great discretion, to communicate and market our services and products to you. You can choose not to receive any invitations or direct mail from us by contacting the SeCan Privacy Officer (See “Contacting Us”).

Limits for Collecting Personal Information

SeCan will only collect personal information for the purposes identified. SeCan will use methods that are lawful and will not collect information indiscriminately.

Limits for Using, Disclosing and Keeping Personal Information

Personal information will only be used or disclosed for the purpose for which it was collected. SeCan will not use personal information for any additional purpose unless SeCan seeks the member's consent to do so.

SeCan may periodically use member personal information to conduct member surveys in order to enhance our provision of member services. If an outside body is employed to conduct research on behalf of SeCan, or provide other service that requires access to member information, SeCan will ensure that appropriate security undertakings such as confidentiality clauses in contractual arrangements are employed to protect the transfer and use of personal information.

SeCan will retain member personal information only as long as necessary or expected to be necessary for the identified purposes, or as required by legislation.

Your Knowledge and Consent

We obtain your consent at or prior to collecting, and prior to using or disclosing your personal information for any purpose. A member's consent may be given orally, in writing, or electronically. For example, depending on the sensitivity of the information, consent can be expressed over the telephone when information is being collected; electronically when submitting an agreement, application, or other information; in writing when signing an agreement; or checking a box indicating whether or not consent is granted.

Subject to contractual or legal arrangements, members may withdraw or refuse consent provided that SeCan is given reasonable notice. Refusal or withdrawal of consent may prevent SeCan from providing a product or service to the member. SeCan will not unreasonably withhold products or services from members who refuse or withdraw consent.

Should you wish to withdraw consent, please contact our Privacy Officer, in writing at seed@secan.com (with Privacy Officer in the subject line) or by mail at the address under "Contacting Us". SeCan will inform you of the implications of withdrawing your consent.

Only under the following exceptional circumstances will SeCan collect, use, or disclose personal information without the member's knowledge or consent:

- When such a collection, use or disclosure is permitted or required by law
- When use of information is for acting in an emergency that threatens an individual's life, health, or personal security
- When certain information is publicly available
- When we require legal advice from a lawyer
- When we need to deal with an anticipated breach of law

How we protect your Personal Information

SeCan is committed to the safekeeping of member personal information in order to prevent its loss, theft, unauthorized access, disclosure, duplication, use, or modification. SeCan will take all commercially reasonable steps to ensure that your personal information in our possession, collected from you, is protected against loss and unauthorized access. This protection applies to information stored in both electronic and hard copy form.

Retention of your Personal Information

SeCan will retain your personal information for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws and regulations. Your consent to such purpose(s) will remain valid after termination of our relationship with you.

Exceptions, Qualifications and Changes to this Privacy Policy

Although not listed in detail in the Privacy Policy, SeCan will rely on any exceptions or qualifications that are set out in the applicable legislation as permitted by law.

SeCan reserves the right to modify this Privacy Policy at any time without notice. The Privacy Policy posted at any time or from time to time on the SeCan Website (www.secan.com) shall be deemed to be the Privacy Policy then in effect.

Providing Member Access to Personal Information

Members have a right to access their personal information held by SeCan. Upon written request, SeCan will, within a reasonable time period, tell the member what personal information it has, what it is being used for, and to whom it has been disclosed, if applicable, and within the time period for which records are available to the extent permitted or required by law.

In certain situations SeCan may not be able to provide access to any or all personal information about a member. In such cases SeCan will explain the reasons it will not provide the requested information and identify recourse available to the member. The reasons for not providing information may include: the information is unreasonably costly to provide; the information would threaten the life or security of another individual; the information was generated in a formal dispute resolution process; the information contains references to other individuals; the information is restricted for legal, security, or commercial proprietary reasons; or the information is subject to solicitor-client or litigation privilege.

Correcting or Updating Your Information

You can help us maintain the accuracy of your personal information by notifying us of any changes to your information. You may contact SeCan (see

“Contacting Us”) to correct or update any of your personal information. We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your personal information. Any such information shall be used only for this purpose.

Contacting Us

Should you have any questions about SeCan’s Privacy Policy or should you have reason to believe that SeCan may have failed to adhere to this Privacy Policy, you may contact our Privacy Officer by email at seed@secan.com, with Privacy Policy in the subject line, or at:

SeCan
Attn: Privacy Officer
501-300 March Road
Ottawa, Ontario, K2K 2E2

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