



PRIVACY COMMITMENT:

The Board has a longstanding policy on the confidentiality of personal information and is committed to protecting the personal privacy of all those with whom it has dealings. The Board keeps all information respecting individuals dealing with the Board in strict confidence. No individual personal information is sold by the Board. The Board has procedures to enable individuals to control how the Board obtains, uses, and gives out personal information, to review that information and to correct any errors that may exist. The Board's procedures and systems are designed to protect such information from error, loss and unauthorized access. The Board keeps such information only as long as it is needed. The Board continually monitors its compliance with applicable privacy legislation. The Board respects peoples' privacy when it carries out its roles and responsibilities. These obligations apply to all Board members, staff, consultants and agents and contractors who provide services to or on behalf of the Board.

REGULATORY DUTIES:

As a local board constituted under the *Farm Products Marketing Act*, the Board through regulation has information filing requirements. Wherever such filings include confidential personal producer information, EFO will use its best efforts to protect such information from third party disclosure under the Freedom of Information and Protection of Privacy Act. However, that determination is ultimately made by the Government of Ontario. The Board collects, uses, discloses and retains this information in order to regulate the production and marketing of the regulated product in accordance with its regulations, policies, orders, directions and decisions. The Board may collect such information directly from producers or from others involved in the production and marketing of the regulated product. In carrying out these regulatory functions, the Board, as a not-for-profit body representing the interests of producers of the regulated product, is not in its own right engaged in commercial activity. Information arising from the Board's exercise of these regulatory authorities is not believed to be subject to the Personal Information Protection and Electronic Documents Act (*PIPEDA*). In those limited circumstances where the Board is engaged in commercial activity, it is subject to *PIPEDA* and all of that Act's provisions apply with respect to personal information collected, used, disclosed or retained as part of that commercial activity. The Board may also use such information to assist other regulatory agencies in undertaking their responsibility on bio-security and food safety issues.

CONSENT REQUIREMENT:

The Board obtains the parties' express or implied consent before obtaining or using personal information about that person or disclosing that information to anyone in the course of commercial activities. Regulatory requirements, as well as bio-security and food safety concerns are excepted from the consent requirement. Participation in certain Board programs will constitute consent to the obtaining, use and disclosure of personal information. Details will be set out in program information packages. Persons not wishing to provide their consent may decline to participate or may notify the Board and their wishes will be respected. In some cases, participation may not be possible where the necessary personal information is not made available.

LIMITED DISCLOSURE:

There are circumstances where use and disclosure of personal information may be justified or permitted under a legal duty or right and the Board may use and disclose such information without the party's consent. In such cases where the Board is of the opinion that it is appropriate or necessary to use or disclose such information, the use and disclosure will be limited so that only that information which is required is used or disclosed.

PRODUCER INFORMATION:

As a general rule, all producer information is held in strict confidence and, except in very limited circumstances, is not revealed to anyone unless expressly or implicitly authorized by the producer. The Board guards its producer mailing list from unauthorized use and disclosure. Where disclosure is deemed by the Board to be of benefit to producers or necessary to address bio-security or food safety concerns, such disclosure will be subject to appropriate safeguards.



In the event of any reportable disease outbreak the provisions of this privacy policy are waived and EFO will, to the extent and to whom necessary, including but not limited to the Canadian Food Inspection Agency, release producer personal information to assist in an effective response.

PRIVACY OFFICER:

The Board has appointed a Privacy Officer charged with the responsibility for developing, implementing and administering the Board's privacy policy. As part of this mandate, the Privacy Officer will put in place all of the necessary internal controls and procedures and will train and supervise Board staff in achieving full compliance with all privacy obligations. The Privacy Officer will receive and follow up on all inquiries. This includes such things as withdrawal of consent, request for disclosure of information on file, corrections to information and termination of consent previously given. All such requests must be in writing and may result in an administrative charge to cover the Board's costs in dealing same.

WEBSITE POLICY:

A visitor to the Board's website is not required to reveal any individually identifiable information such as name, address or telephone number. Nor is such information collected passively by electronic means. Information is collected when an individual voluntarily completes an online survey. This information is collected, used or disclosed in a manner consistent with this policy statement. E-mail addresses are also collected during any surveys but participants may indicate that they do not wish to receive any unsolicited electronic communication. The Board's web server does not collect visitor information in the form of the visitor's domain or internet protocol (IP) address but does collect information regarding which pages are accessed. This information is used internally, only in aggregate form, to help the Board serve website users better. None of this information is retained after it has been used and is discarded in a secure manner. Any user of the Board's website may access the information held by the Board about them in connection with their visits to the website. Any inaccuracies that are brought to the Board's attention will be corrected.

COMPLIANCE CONCERNS:

Any complaints concerning the access to, accuracy, management or use of personal information should be addressed in writing to the Privacy Officer. All such inquiries will be responded to within 30 days of receipt at the Board office. Any unresolved matters may be referred by the Privacy Officer to the Board. If a party is still not satisfied, contact should be made with the office of the Privacy Commissioner in Ottawa.

POLICY REVIEW:

This Privacy Policy is in effect as of September 6, 2006. The Board will from time to time review and revise its privacy practices and this privacy policy. In the event of any amendments to this privacy policy, a notice will be posted on the Board's website or communicated to producers through Board publications.

The Board is committed to meeting all of its privacy obligations. Any questions or suggestions will be welcome and should be addressed to the Privacy Officer.

Dated at Mississauga, this 4th day of October, 2017.

Egg Farmers of Ontario