

Eden Valley Poultry Incorporated Policies and Procedures

POLICY TITLE: Privacy of Personal Information
ISSUED BY: Sharon Beasley, Chief Financial Officer
REVISION DATE: August 20, 2018
APPROVED BY: Eden Valley Poultry Board of Directors
DISTRIBUTION: All staff, EVP Directors

PREVIOUSLY ISSUED: November 28, 2017
PREVIOUSLY BY: Sharon Beasley, CFO

The purpose of this policy is to clarify the rules regarding the privacy of personal information known to Eden Valley Poultry (EVP).

Protecting the privacy and confidentiality of personal information is an important aspect of the way EVP conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to Eden Valley Poultry's daily operations.

EVP strives to protect and respect personal information of its customers, employees, directors, shareholders, suppliers, business partners, and any other individual(s) who have provided personal information to EVP in accordance with all applicable provincial and federal laws. Each staff member of Eden Valley Poultry must abide by the policies, procedures and practices when handling personal information.

Definitions:

Personal information is defined as information about an identifiable individual, which includes, but may not be limited to an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, medical history etc.

Business information is defined as Eden Valley Poultry's, business address, business telephone number, name(s) of owner(s), executive officer(s), and director(s), job titles, business registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information. If business information is in the public domain it is not considered confidential.

Consent is defined as authorization to collect, use, and/or disclose an individual's personal information for the purposes stated on the form or in the Appropriate Use section of this policy.

Consent occurs and is obtained when an individual signs an application or other form or communication containing personal information.

Furthermore, implied consent is granted by the individual when he/she signs the application form. This allows Eden Valley Poultry to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or insurance companies) in the process of assessing the eligibility of an individual, customer, client, job applicant, or business partner.

Policy:

This Privacy Policy informs everyone of EVP's commitment to privacy and establishes the methods by which privacy is ensured. This Privacy Policy applies to all personal information within EVP's possession and control.

Eden Valley Poultry assumes full accountability for the personal information within its possession and control. This organization has appointed the Chief Financial Officer as the Privacy Officer for all privacy matters and legal compliance with privacy laws. You can contact the Privacy Officer at 902-698-2146.

Eden Valley Poultry obtains personal information directly from the individual to which the information belongs. Individuals are entitled to know how EVP uses personal information and will limit the use of any personal information collected only to what is needed for those stated purposes. Eden Valley Poultry will obtain individual consent if personal information is to be used for any other purpose and will not use the information without the consent of the individual.

Under no circumstances will Eden Valley Poultry sell, distribute, or otherwise disclose personal information or contact lists to third parties. However, limited disclosure may be required as part of the company's fulfilling its stated business duties and day-to-day operations. This may include consultants, suppliers, or business partners of Eden Valley Poultry, but only with the understanding that these parties obey and abide by this Privacy Policy, to the extent necessary of fulfilling their own business duties and day-to-day operations.

Eden Valley Poultry will retain personal information only for the duration it is needed for conducting business. Once personal information is no longer required, it will be destroyed in a safe and secure manner. However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy.

Eden Valley Poultry will protect personal information with the appropriate security measures, physical safeguards, and electronic precautions. EVP maintains personal information through a

combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, offsite location.

Access to personal information will be authorized only for the employees and other agents of Eden Valley Poultry who require the information to perform their job duties, and to those otherwise authorized by law.

Eden Valley Poultry's computer and network systems are secured by complex passwords. Only authorized individuals may access secure systems and databases. Routers and servers connected to the Internet are protected by a firewall, and are further protected by virus attacks or "snooping" by sufficient software solutions.

Active employee files are kept in locked filing cabinets.

Eden Valley Poultry Web site includes our privacy policy and discloses our personal information practices.

In most instances, the company will grant individuals access to their personal information upon presentation of a written request and satisfactory identification. If an individual finds errors of fact with his/her personal information they should notify the appropriate manager or the Privacy Officer as soon as possible to make the required corrections. Should an individual's request for access to his/her personal information be denied, EVP will advise in writing of the reason for such a refusal. Access will not be unreasonably withheld.

Eden Valley Poultry may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:

- An obligation by law to disclose personal information in order to adhere to the requirements of an investigation.
- An emergency exists that threatens an individual's life, health, or personal security.
- The personal information is for in-house statistical study or research.
- The personal information is already publicly available.
- Disclosure is required to investigate a breach of contract.

Appropriate Use

Eden Valley Poultry collects and uses personal information solely for the purpose of conducting business including but not limited to paying employees both wages and expense reimbursement, payment of fees to Directors, payment to suppliers, setting up customer accounts, verifying credit information, etc.

Exceptions:

There are no exceptions to this policy.

Risk:

Disclosure of personal information collected in the course of conducting business as Eden Valley Poultry creates a risk of litigation from the aggrieved individual. This could result in financial costs to the company.

Consequence:

Any employee who fails to follow this policy will be subject to disciplinary action as follows:

- 1. verbal warning
- 2. written warning
- 3. termination of employment.

Acknowledgement and Agreement

I, _____, acknowledge that I have read and understand the Privacy Policy of Eden Valley Poultry Inc. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules/procedures outlined in this policy, I may face disciplinary action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Witness: _____