Privacy and Personal Information Protection Policy
Version 4.0

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PRIVACY AND PERSONAL INFORMATION PROTECTION POLICY

1.0 POLICY

1.01 The Canadian Cattle Identification Agency is committed to protecting the privacy of its employees, clients, volunteers and confidential business information.

1.02 Employees, board members (and other volunteers as necessary) are required to sign a confidentiality agreement and are obligated to ensure that personal information to which they may have access remains confidential, is only used for the purposes for which it was collected, is not disclosed without authorization or used for personal gain.

1.03 Employees are required to follow all procedures regarding collection, use, and disclosure of personal information as set out in this policy.

1.04 Employees who disclose personal information, contrary to this policy will be subject to disciplinary measures, up to and including discharge for cause.

1.05 Legal counsel shall be the Privacy Officer for the Canadian Cattle Identification Agency and is accountable for the implementation of this policy and the following steps shall be taken:

a. A privacy email address will be established;
b. The Privacy Policy will be posted on the CCIA website;
c. The Privacy Policy statement will be added to all documents used for the collection of personal information and all other appropriate materials; and
d. An annual privacy audit led by the Privacy Officer will be conducted and the results reported to the Board.

Any issues or questions regarding this policy should be directed to the Privacy Officer at:

Privacy Officer
Canadian Cattle Identification Agency
7171 - 107 Ave SE, Calgary, Alberta T2C 5N6
P 403-275-2083 | F 403-275-1668 | Email: privacy@canadaid.ca

1.06 This policy is binding on all personal information that is provided directly to the Canadian Cattle Identification Agency or through generic forms or processes under our auspices.

2.0 PURPOSE

2.01 All employees at one time or another may receive personal, privileged and/or confidential information which may concern other employees, company operations or clients and volunteers. The purpose of this policy is to preserve the privacy of employees, clients and volunteers and Canadian Cattle Identification Agency, by outlining employee obligations and procedures for dealing with personal, privileged and/ or confidential information.

All Staff at one time or another may receive personal, privileged and/or confidential information which may concern other Staff, company operations or clients and volunteers. The purpose of this policy is to preserve the privacy of Staff, clients and volunteers and CCIA, by outlining staff obligations and procedures for dealing with personal, privileged and/or confidential information.

Under the applicable privacy legislation and by agreement, Canadian Cattle Identification Agency is required to have a Privacy Policy to describe our use and protection of personal information. This policy will be posted to our web site and made available to all staff and volunteers. It covers collection of personal information through our online donations page and through our pledge card, for which we have responsibility, as well as govern our relationship with the general public.

3.0 POLICY SCOPE

3.01 All volunteers and staff or anyone else who is granted access to personal, privileged and/or confidential information are required to abide by the guidelines and regulations contained within this policy.

4.0 RESPONSIBILITIES

4.01 CCIA must be in compliance with all applicable privacy legislation and the accompanying regulations. The Privacy Officer and the CCIA Board must review this policy and accompanying procedure annually to ensure compliance is met for current legislation as the government has the power to impose penalties on organizations that are determined to be non-compliant. For CCIA staff, failure to comply with this policy could result in serious, negative consequences for the organization, therefore disciplinary measures up to and including just cause for termination of employment may be applied.

4.02 Employees are responsible for:

a. keeping their own employee files current regarding name, address, phone number, dependents, etc.;

b. being familiar with and following policies and procedures regarding personal information;
c. obtaining the proper consents and authorizations prior to disclosure of personal, privileged and/or confidential information;
d. immediately reporting any breaches of confidentiality to their Supervisor;
e. keeping private passwords and access to personal, privileged and/or confidential data;
f. explaining this policy to clients and volunteers and referring them to the Privacy Officer if necessary; and
g. relinquishing any personal, privileged, confidential or client information in their possession before or immediately upon termination of employment.

4.03 Supervisors are responsible for:

a. obtaining consent to the collection and use of personal information from employees;
b. ensuring policies and procedures regarding collection, use and disclosure of information of personal information are consistently adhered to;
c. responding to requests for disclosure after the proper release is obtained;
d. co-operating with Legal Counsel to investigate complaints or breaches of policy;
e. obtaining from terminating employees prior to their termination any personal, privileged, confidential or client information in their possession;
f. ensuring that disclosure of personal information or personal health information to a Third Party is done with the approval of the Board in order to minimize risk of non-compliance with applicable legislative or regulatory regimes; and
g. educating their staff and appropriate volunteers about the CCIA Privacy and Personal Information Protection policy and procedure.

4.04 Human Resources and/or Payroll personnel are responsible for:

a. ensuring that appropriate consents have been obtained from employees with respect to the collection and use of personal information;
b. maintaining systems and procedures to ensure employee records are kept private;
c. obtaining the proper consents and authorizations prior to disclosure of information contained in employee records;
d. responding to employees' requests for access to their files;
e. ensuring proper disposal of unnecessary files/information;
f. maintaining separate files to ensure that personal health information is protected; and
g. ensuring that disclosure of personal information or personal health information to a Third Party is done with the approval of the Board in order to minimize risk of non-compliance with applicable legislative or regulatory regimes.

4.05 The Privacy Officer is responsible for:

a. internal compliance with applicable policies or legislation;
b. cooperating with supervisors, human resources and/or payroll personnel in developing internal policies for the collection, use and disclosure of personal information and personal health information of employees and clients;
c. monitoring and responding to Third Party requests for personal information or personal health information;
d. ensuring appropriate consents are obtained for the collection, use and disclosure of personal information and personal health information;
e. where collection, use or disclosure is permitted without prior consent, notifying individuals of the collection, use and disclosure of personal information and/or personal health information after such occurrence; and
f. reporting to the Board on these responsibilities.

4.06 Canadian Cattle Identification Agency will not release Personal information to third parties unless:

a. the person involved expressly authorizes in writing the appropriate CCIA personnel to share the information;
b. sharing the information that is necessary to process a donation and/or to process a credit card transaction; and
c. the CCIA is required by law to do so.

5.0 DEFINITIONS

5.01 "Personal information" is any information about an identifiable individual and includes name, race, ethnic origin, colour, age, marital status, family status, religion, education, medical history, criminal record, employment history, financial status, address, telephone number, and any numerical identification, such as Social Insurance Number. Personal information also includes information that may relate to the work performance of the individual, any allegations, investigations or findings of wrongdoing, misconduct or discipline. Personal information does not include job title, business contact information or job description.

5.02 "Personal health information" is information about an identifiable individual that relates to the physical or mental health of the individual, the provision of health care to the individual, the individual's entitlement to payment for health care, the individual's health card number, the identity of providers of health care to the individual or the identity of substitute decision-makers on behalf of the individual.

5.03 "Third parties" are individuals or organizations other than the subject of the records or representatives of Canadian Cattle Identification Agency. Note that in certain

circumstances, the company may be entitled to provide personal information to an external party acting as an agent of Canadian Cattle Identification Agency.

6.0 FEEDBACK PROCESS

6.01 Questions and comments regarding this policy are welcomed and appreciated. Feedback regarding our Privacy policy and procedure can be made to the attention of the Privacy Officer at:

Privacy Officer
Canadian Cattle Identification Agency
7171 - 107 Ave SE, Calgary, Alberta T2C 5N6
P 403-275-2083 | F 403-275-1668 | Email: privacy@canadaid.ca

6.02 Confirmation that a request was received will be acknowledged within 72 hours. A response to feedback will be issued within 30 days from the date the feedback was provided. Complaints will be addressed according to Canadian Cattle Identification Agency's existing complaint management procedures.

7.0 REFERENCES AND RELATED CCIA STATEMENTS of POLICY and PROCEDURE

a. CCIA Information Privacy Policy
b. Personal Information Protection and Electronic Documents Act (PIPEDA) http://www.priv.gc.ca/leg_c/leg_c_p_e.asp
c. Privacy Act http://www.priv.gc.ca/leg_c/legislation/02_07_01_01_e.asp

8.0 PROCEDURE

8.01 Employee Records

a. An employee's supervisor, higher level managers, human resources and payroll personnel shall have access to employee records containing personal information. An employee's supervisor, higher level managers, human resources and payroll personnel will have access to an employee's personal health information if either Legal Counsel or the General Manager determines that such access is permissible and necessary. Personal information and personal health information will not be disclosed outside of the organization without the knowledge and/or approval of the employee. Notwithstanding the foregoing, Canadian Cattle Identification Agency will cooperate with law enforcement agencies and will comply

with any court order or law requiring disclosure of personal information without the employee's consent;

b. Employees may request access to review their own file by making arrangements with the General Manager. Employees shall provide at least twenty-four (24) hours' notice to the General Manager. Employees may obtain a copy of any document in their file which they have signed previously. No material contained in an employee file may be removed from the file. A representative of the General Manager will be present during viewing of the file;

c. An employee may provide a written notice of correction related to any data contained in the employee's file. The notice of correction shall be provided to the General Manager;

d. Employee requests for disclosure of their own personal information to Third Parties must be accompanied by a completed, signed and dated Authorization to Release Information form. Attachment A to this policy is used for this purpose. This form should also be used in dealings with insurance companies with respect to employee benefits and to provide confirmation of earnings to financial institutions for lending purposes; and

e. Unless retention of personal information is specified by law for certain time periods, personal information that is no longer required to fulfill the identified purpose shall be destroyed, erased or made anonymous within 12 months after its use.

8.02 Client/Volunteer Information

a. Personal, privileged and/or confidential information about clients/volunteers may only be collected, used, disclosed and retained for the purposes identified by Canadian Cattle Identification Agency as necessary;

b. Employees must ensure that no personal, privileged and/or confidential client/ volunteer information is disclosed without the client's consent and then only if security procedures are satisfied;

c. Client/volunteer information is only to be accessed by employees with appropriate authorization; and

d. Unless retention of personal information is specified by law for certain time periods, personal information that is no longer required to fulfill the identified purpose shall be destroyed, erased or made anonymous within 12 months after its use.

8.03 Notwithstanding Paragraphs 8.01(e) and 8.02(d) personal information that is the subject of a request by an individual or a Privacy Commission shall be retained as long as necessary to allow individuals to exhaust any recourse they may have under PIPEDA.

8.04 Concerns or complaints related to privacy issues must be made, in writing, to the Privacy Officer setting out the details of the concern or complaint. The Privacy Officer shall investigate the matter forthwith and make a determination related the resolution of the concern(s) or complaint(s).

8.05 No employee shall be disadvantaged or denied any benefit of employment by reason that Canadian Cattle Identification Agency believes that an employee will do anything referred to paragraphs (a), (b), or (c) below or by reason that an employee, acting in good faith and on the basis of reasonable belief:

a. has disclosed to the Privacy Commissioner of Canada that Canadian Cattle Identification Agency or any other person has contravened or intends to contravene a provision of PIPEDA related to the protection of personal information;

b. has refused or stated the intention of refusing to do anything that it is in contravention of a provision of PIPEDA related to the protection of personal information; or

c. has done or stated an intention of doing anything that is required to be done in order that a provision of PIPEDA related to the protection of personal information not be contravened.

8.06 Breach of Confidentiality

It is a breach of confidentiality to:

a. Discuss any confidential information within or outside the organization where it may be heard by individuals who are not authorized to have access to that information;
b. Provide confidential information or records to unauthorized individuals; and
c. Leave confidential information in written form or displayed on a computer terminal in a location where it may be view by unauthorized individuals.

An employee who is found to be in breach of this policy will be subject to discipline up to and including discharge for cause.

A breach of the confidentiality obligation may be grounds for a board member to be removed as a director of the organization. A board member who breaches confidentiality may not be covered by the Canadian Cattle Identification Agency's insurance if s/he is sued for libel.

Notwithstanding, information that is the subject of a request by an individual or a Privacy Commission shall be retained as long as necessary to allow individuals to exhaust any recourse they may have under PIPEDA.

8.08 Confidentiality Agreement

Staff, board members (and other volunteers as necessary) are required to sign confidentiality agreement and are obligated to ensure that personal information to which they may have access remains confidential, is only used for the purposes for which it was collected, is not disclosed without authorization or used for personal gain.

8.09 Canadian Livestock Tracking System (CLTS) account materials/forms

a. All CLTS materials/forms shall include a reference to our Privacy policy:

"The Canadian Cattle Identification Agency is committed to protecting the privacy and confidentiality of your personal information. The information you provide us may be used to assist in the proper administration of your CLTS account, to report regulatory information, and to fulfill your information requests. For complete details of our privacy policy, please go to www.canadaid.ca."

b. The materials shall also provide contact information for client enquiries:

If you have any questions about the privacy policy, please feel free to contact:

Privacy Officer
Canadian Cattle Identification Agency
7171 - 107 Ave SE, Calgary, AB, T2C 5N6
P 403-275-2083 | F 403-275-1668 | Email: privacy@canadaid.ca

8.10 Handling Complaints

The Privacy Officer will respond to all complaints about collection use, disclosure, storage and disposal of personal information within thirty days of the request being made, and advise the complainant as to the action that has been taken.

Each complaint will be assessed to determine whether:

a. Correction of personal information is necessary;
b. Information was collected, used, released or disposed of inappropriately;
c. The CCIA's policies and procedure need to be strengthened; and

d. Disciplinary or other action needs to be taken with respect to a breach of a confidentiality agreement.

Where necessary, the Privacy Officer will make the necessary recommendations to the Board of Directors in connection with resolution of the complaint.

9.0 ATTACHMENTS

9.01 Authorization to Release Personal Information

10.0 MODIFICATIONS TO THIS OR OTHER POLICIES

10.01 Any policy of the Canadian Cattle Identification Agency that does not meet with the accepted practices of CCIA's Privacy policy will be modified or removed.

REVISION CONTROL

Date: July 2022

Effective: July 2022

Attachment A

AUTHORIZATION TO RELEASE PERSONAL INFORMATION

I, _____ [Employee's Name], hereby authorize Canadian Cattle Identification Agency to release personal information listed below to _____ [Third Party].

Choose whichever apply:

____ Confirmation of employment and salary information (usually used for banking/lending purposes).

____ All employment information in company's possession, including dates of hire, positions held, information relating to performance and attendance (both objective and subjective), salary information and all related matters (usually used for reference checking purposes).

____ Any medical information in the company's possession (including absences, medical notes or reports (usually used for sick leave, disability benefits or health insurance).

____ Other (specify information to be released): _____

I hereby release and discharge the Canadian Cattle Identification Agency from any claim whatsoever relating to the Canadian Cattle Identification Agency acting in accordance with this Authorization.

_____ _____

Employee's Signature Date