

Alberta Milk

Personal Information Protection Policy

The protection of personal information is important to Alberta Milk and it is committed to safeguarding the personal information entrusted by the dairy producers it represents, and by the processors, customers, clients and employees. Alberta Milk manages personal information in accordance with *Alberta's Personal Information Protection Act* and other applicable laws. This policy outlines principles and practices Alberta Milk follows in protecting personal information. Any questions about this policy can be directed to Carla Babichuk, Alberta Milk's privacy officer.

This policy applies to Alberta Milk directors and delegates, officers, and employees. The policy also applies to any person or persons providing third party services on behalf of Alberta Milk such as milk haulers, mailing houses, general contractors, and the CMT Lab. All third party service providers are required to adhere to his policy and take all reasonable steps to ensure that personal information is protected from unauthorized access.

A copy of this policy is posted on www.albertamilk.com or can be provided to our producers, processors, milk haulers, customers, clients and employees on request.

What is personal information?

Personal information means information about an identifiable individual such as an individual's name, home address and phone number, age, sex, marital or family status, ethnic origin, citizenship, medical history, an identifying number, financial information, and/or educational and employment history.

What personal information does Alberta Milk collect?

Alberta Milk collects the personal information that it needs to carry out our regulatory duties and purposes under the *Marketing of Agricultural Practices Act* ("the Act"), the *Alberta Milk Plan Regulation* ("the Plan"), the *Alberta Milk Marketing Regulation* ("the Marketing Regulation") and other regulations made under the Act in respect to Alberta Milk. These duties and purposes relate generally to the control and regulation of the production and marketing of milk in Alberta and include among others:

- a) licensing milk producers and milk processors;
- b) establishing and administering milk producer quotas;
- c) operating producers pools for revenues and expenses;
- d) establishing and administering milk hauling routes and rates;
- e) co-operating with the Canadian Dairy Commission and other provincial and national agencies in the administration of a national supply management system for milk;
- f) meeting regulatory requirements set under the Act, the Plan, the Marketing Regulation or other regulations relating to Alberta Milk.

Alberta Milk may also collect some additional personal information needed for the purposes of providing services or information to its producers, processors, customers, members of the public and employees, including personal information needed to:

- Deliver requested products and services
- Enrol in a program
- Guarantee a travel or hotel reservation
- Process a subscription

- Send out information to producers, processors, milk haulers, clients or members of the public who have asked for information
- Contact about appointments
- Follow up with clients or members of the public to determine satisfaction with products and services
- Notify clients of upcoming events of interest
- Grant credit
- Meet regulatory requirements

Alberta Milk normally collects personal information directly from its producers, processors, milk haulers, customers, clients, employees, and members of the public who contact Alberta Milk. We may collect personal information from other persons with consent or as authorized by law pursuant to Alberta Milk's regulatory duties and purposes referred to above.

Alberta Milk informs its producers, customers, clients and employees before or at the time of collecting personal information (by way of a privacy statement on the form that has the information) of the purposes for which it is collecting the information. Alberta Milk does not provide this notification when an individual volunteers information for an obvious purpose (for example, producing a credit card for a purchase when the information will be used to process the payment) or when the information is regularly provided by producers, processors and milk haulers as part of the operation of the production and marketing of milk and the milk supply management system.

Consent

Alberta Milk asks for consent to collect, use or disclose personal information, except where the collection, use or disclosure without consent is part of the ongoing regulation and operation of the milk supply management system authorized by the Act, the Plan, the Marketing Regulation, and related regulations. In circumstances not dealing with regulatory duties, Alberta Milk may assume consent in cases where information is volunteered for an obvious purpose.

In cases where Alberta Milk collected personal information before Jan. 1, 2004, not directly related to its regulatory duties, consent is assumed and used, where applicable, and disclosed for the purposes for which the information was collected.

In circumstances that do not relate to Alberta Milk's regulatory duties and functions, it may ask for express consent for some purposes and may not be able to provide certain services if there is an unwillingness to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, Alberta Milk will normally ask clients to provide their consent orally (in person, by telephone), in writing (by using a consent form, by checking a box on a form), or electronically (by clicking a button).

In circumstances that do not relate to Alberta Milk's regulatory duties and functions and where express consent is required, our producers, customers, clients and employees may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for Alberta Milk to fulfill its legal obligations. Alberta Milk respects these decisions and may not be able to provide certain products and services if it does not have the necessary personal information.

Alberta Milk may collect, use or disclose client personal information without consent only as authorized by law. For example, it may not request consent when the collection, use or disclosure is reasonable for an investigation or legal proceeding, to collect a debt owed to Alberta Milk, in an

emergency that threatens life, health or safety, or when the personal information is from a public telephone directory.

How do we use and disclose personal information?

Alberta Milk uses and discloses producers, customers, clients and employees' personal information only for the purposes for which the information was collected, except as authorized by law. For example, Alberta Milk may use client contact information to deliver goods. The law also allows Alberta Milk to use that contact information for the purpose of collecting a debt owed to Alberta Milk, should that be necessary.

How do we store and safeguard personal information?

Alberta Milk makes every reasonable effort to ensure that client information is accurate and complete. Alberta Milk relies on producers, customers, clients and employees to notify the office if there is a change to their personal information that may affect their relationship with our organization. If there is an error or omission in the personal information Alberta Milk has, producers, customers, clients and employees are encouraged to inform us so that corrections can be made. In some cases, Alberta Milk may ask for a written request for correction. If personal information needs to be changed, producers, customers, clients and employees are asked to contact the privacy officer.

Alberta Milk protects client personal information in a manner appropriate for the sensitivity of the information. Alberta Milk makes every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

Alberta Milk uses appropriate security measures when destroying client personal information, including shredding paper records and permanently deleting electronic records.

Personal information is retained only for as long as is reasonable to fulfill the purposes for which the information was collected or for legal, regulatory or business purposes. This may include keeping the information after a project is completed or a producer, processor or milk hauler has left the industry, in order to resolve any problems or concerns that may arise. We are also required by law to maintain certain records for set amounts of time.

Access to records containing personal information

Producers, customers, clients and employees have a right of access to their personal information in a record that is in our custody or under our control, subject to some exceptions. For example, organizations are required under PIPA to refuse to provide access to information that would reveal personal information about another individual. Organizations are authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records.

If a request is refused in whole or in part, Alberta Milk will provide the reasons for the refusal. In some cases where exceptions to access apply, Alberta Milk may withhold that information and provide the remainder of the record.

You may make a request for access to your personal information in writing to Carla Babichuk, privacy officer. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization other than disclosures routinely made for our regulatory purposes. For personal information collected before January 2004, if Alberta Milk does not have a record of disclosures, it will provide information about any disclosure of your information that is likely to have occurred.

You may also request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee, as set from time to time by the board, to provide information but not to make a correction. Alberta Milk will advise of any fees that may apply before beginning to process your request.

Accountability

Alberta Milk applies our best efforts to protect the personal information it collects. If our producers, processors, milk haulers, customers, clients and employees have any concerns, they are free to contact

Carla Babichuk, Privacy Officer
Alberta Milk
14904-121A Ave.
Edmonton, Alberta
T5V 1A3
Phone: 780-453-5902 ext. 333
Toll-free: 1-800-252-7530
Fax: 780-455-2196
cbabichuk@albertamilk.com

We hope that the officer will be able to resolve any problems. If concerns are not resolved, contact the Information and Privacy Commissioner of Alberta at

Office of the Information and Privacy Commissioner of Alberta
Suite 500, 640 – 5th Avenue SW
Calgary, Alberta
T2P 3G4
Phone 403-297-2728
Toll-free 1-888-878-4044
generalinfo@oipc.ab.ca
www.oipc.ab.ca

Date effective: Jan. 19, 2005