

## OGVG Privacy Policy

At OGVG, we are dedicated to protecting your privacy and safeguarding your personal, business, and confidential information. In fact, it is one of our highest priorities and remains the cornerstone of our commitment to you. However, you choose to provide information to us, we use vigorous security safeguards and adhere to Ten Privacy Principles to ensure your personal and confidential information is protected.

The following is considered confidential information:

- All information in any form relating to OGVG members
- All contracts
- All human resources files and proceedings
- All financial information, status and statements; and
- All information or documentation labelled “Confidential” by OGVG, or listed as such by separate memorandum, or e-mail that advises confidential status.

This information may be related to, without being limited to, personal information of any kind about members or employees, as well as information about the operations of OGVG (e.g., personnel matters, internal financial procedures, contractual information, and intellectual property of OGVG).

Respect for OGVG’s Privacy Policy is of utmost importance.

Confidential information shall not be used for any purpose other than its reasonable use in the normal performance of employment duties.

### Scope

This policy applies to all employees and contractors.

### Requirement of Confidentiality

OGVG requires all employees to handle member information in a confidential and appropriate manner. It is understood that employees will become aware of confidential information regarding our members through the course of their employment. Employees agree that if confidential information is not effectively protected, the operations of OGVG may be threatened, and the well-being and privacy of our members may suffer irreparably.

Employees will take all reasonable precautions to safeguard the confidentiality of such information (e.g., ensuring confidential material is kept locked when not being used; shielding computer screens with confidential information from unauthorized viewing; taking special precautions when transporting confidential documents).

## Personal Information Purposes

OGVG collects, uses, and discloses personal information about our members in order to:

- Provide quality services to members
- Provide information to other people and organizations with member consent
- Contact members for the purposes of evaluating OGVG's service and work
- Conduct research
- Corporate reporting
- Review member files to ensure high quality of service and documentation
- OGVG may also collect, use and disclose personal information with consent or as permitted or required by law or contract.

## Member Privacy

OGVG is committed to protecting the privacy of its members and ensuring that:

- The personal information it receives from members is kept safe, secure, confidential, accurate and up to date
- Members understand why their personal information is collected by OGVG
- OGVG obtains member consent before collecting, using, disclosing member information, except as set out in this Policy or permitted or required by law
- Only the personal information necessary for the purposes listed above is collected from members, unless otherwise permitted or required by law
- Access to member information is limited to the employees involved in delivering or administering services to members
- Any external agents to whom OGVG discloses information have a need to know and only use and disclose member information for the purposes for which it was originally provided
- Members are able to withdraw their consent at any time to the collection, use and disclosure of their personal information
- Members have access to their record, except where OGVG is entitled to refuse an access request, and are able to copy or correct their record and ask questions about OGVG's privacy policies and procedures
- Complaints about OGVG's privacy policies and procedures are handled efficiently and effectively; and
- All legal and regulatory requirements regarding member information are met and maintained.

## Privacy Principles

OGVG adheres to the ten (10) Privacy Principles. They are discussed below.

### Principle 1 – Accountability

OGVG is responsible for maintaining and protecting member's information under its control. In fulfilling this mandate, OGVG must designate an individual who is accountable for compliance with this Privacy Policy. The individual responsible for compliance with this Privacy Policy at the OGVG will be the Operations & Compliance Manager.

The duties of the Operations & Compliance Manager include:

- Maintaining knowledge of privacy legislation and regulations
- Making recommendations with respect to OGVG's Privacy Policies

- Ensuring that all employees have training on the Privacy Policy
- Monitoring employee compliance with OGVG's Privacy Policy
- Responding to privacy-related complaints and concerns
- Responding to requests for member access and correction
- Responding to inquiries from the public about OGVG's privacy practices
- Liaising with other organizations, the public and government, as necessary, on privacy-related issues.

Questions, comments or complaints about OGVG's Privacy Policy and procedures or about the collection, use or disclosure of personal information will be directed to the Operations & Compliance Manager.

## Principle 2 - Identifying Purposes

The purposes for which member's information is collected must be identified before or at the time the information is collected.

## Principle 3 - Consent

The knowledge and consent of the member is required for the collection, use or disclosure of member's information, except where required or permitted by law.

## Principle 4 - Limiting Collection

The member's information collected must be limited to those details necessary for the purposes identified by the OGVG. Information must be collected by fair and lawful means.

## Principle 5 - Limiting Use, Disclosure and Retention

Membership information may only be used or disclosed for the purpose for which it was collected unless the member has otherwise consented, or when it is required or permitted by law. Member's information may only be retained for the period of time required to fulfill the purpose for which it was collected.

## Principle 6 - Accuracy

Member's information must be maintained in an accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

## Principle 7 - Safeguarding Member's Information

Member's information must be protected by security safeguards that are appropriate to the sensitivity of the information.

## Principle 8 - Openness

OGVG shall make readily available to members, specific information about its policies and practices relating to the management of personal & private information.

## Principle 9 – Member's Access

Upon written request, members shall be informed of the existence, use and disclosure of their information, and be given access to it. Members may verify the accuracy and completeness of their information, and have it amended, if appropriate.

## Principle 10 - Handling Member's Complaints and Suggestions

Members may direct any questions or enquiries with respect to the privacy principles outlined above or about OGVG's privacy practices by contacting the designated person accountable for privacy at OGVG.

## Collection and Use of Member's Information

OGVG may from time to time collect member's information such as:

- Information about the identity of the member (for example, name, contacts, owner's information, address, phone number, date of birth, etc.)
- Information relating to the production or marketing of greenhouse vegetables including the completing and filing of returns as OGVG determines; and
- Information pertaining to sales reporting, net pay reporting, costs of production, sales rebates and any additional information associated to the producing or marketing greenhouse vegetables

OGVG may collect this information during the course of its relationship with the member. OGVG may obtain this information from a variety of sources, including from the member, from service arrangements the member makes with or through OGVG (third party reporting), from businesses and other producers, packers and/or marketers the member provides to OGVG.

The member acknowledges receipt of notice that from time to time reports about the member may be obtained by OGVG from third parties.

## Using Member's information

OGVG may make this information available to its employees, agents and service providers, who are required to maintain the confidentiality of this information. With the member's specific consent, OGVG may use this information for the following purposes:

- To verify the member's identity and conduct investigations
- To open and operate the member's accounts and provide the member with membership benefits that the member may request
- To determine the member's eligibility for rebates and programs offered by OGVG
- To help OGVG better manage its operation and the member's relationship with OGVG; and
- To publish necessary information on a restricted access basis to support reporting initiatives, information associated with the producing or marketing greenhouse vegetables and/or any other requirement as outlined in OGVG Regulations.

## The Member's right to access Member information

The member may obtain access to the information OGVG holds about the member at any time and review its content and accuracy, and have it amended as appropriate. To request access to such information, to ask questions about OGVG's privacy policies or to request that the information not be used for any or all of the purposes outlined in using member's information, the member may do so now or at any time in the future by contacting OGVG or calling the OGVG at 519.326.2604. The member may obtain more information about OGVG's privacy policies by calling the toll-free number shown above or by visiting OGVG's web site at [www.ogvg.com](http://www.ogvg.com)