



*Long-Term Thinking
for Today's Issues*

PRIVACY POLICY

CHRISTIAN FARMERS FEDERATION OF ONTARIO

Privacy Commitment

The Christian Farmers Federation of Ontario is committed to protecting the personal privacy of all those with whom it has dealings.

For ease of discussion, personal information means any information about you except your name, business title, business address, business e-mail address, business telephone number or business facsimile number. It also does not include your home address and telephone number if these are published in a telephone or other directory.

In this regard, the CFFO makes the following commitments:

- The CFFO keeps all personal information respecting individuals dealing with the CFFO in strict confidence.
- No individual personal information is sold by the CFFO.
- The CFFO has procedures to enable individuals to control how the CFFO obtains, uses and gives out personal information, to review that information and to correct any errors that may exist.
- The CFFO's procedures and systems are designed to protect such information from error, loss and unauthorized access and retains such information only as long as needed.
- The CFFO continually monitors its compliance with applicable privacy legislation.

- The CFFO respects the privacy of individuals when it carries out its roles and responsibilities. These obligations apply to all CFFO members, staff, consultants and agents and contractors who provide services to or on behalf of the CFFO.

Regulatory Duties

The CFFO is constituted as a corporation without share capital through a letters patent obtained on June 26, 1991. In addition, the CFFO is an accredited general farm organization under the auspices of the Farm Registration and Farm Organizations Funding Act, 1993 (FRFOFA). Through the FRFOFA the CFFO collects, uses, discloses and retains prescribed information in accordance with the Act's regulations, policies, orders, directions and decisions. The CFFO may also collect such information directly from members.

In carrying out these regulatory functions, the CFFO as a not-for-profit body representing the interests of members is not in its own right engaged in commercial activity. Information arising from the CFFO's exercise of these regulatory authorities is not believed to be subject to the PIPEDA. In those limited circumstances where the CFFO 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.

Privacy Officer

The CFFO has appointed its General Manager as its Privacy Officer. The Privacy Officer is charged with the responsibility for developing, implementing and administering the CFFO'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 CFFO staff in achieving full compliance with all privacy obligations.

Contact the CFFO Privacy Officer at

5563 Highway 6 North, RR 5 Guelph, Ontario, N1H 6J2

Telephone: 519-837-1620, Fax: 519-824-1835

E-Mail: cffomail@christianfarmers.org

Type of Information Collected

As noted above, the CFFO collects, uses, discloses and retains prescribed information in accordance with the Farm Registration and Farm Organizations Funding Act, 1993 (FRFOFA). In addition, the CFFO collects information at meetings, seminars, workshops and public events that are utilized either for awarding contest prizes, or for developing aggregate data used in the development of CFFO public policy statements.

Member Information

As a general rule, all member information is held in strict confidence and, except in very limited circumstances, is not revealed to anyone unless expressly or implicitly authorized by the member. The CFFO guards its member mailing list from unauthorized use and disclosure. Where disclosure to third parties is deemed by the CFFO to be of benefit to members, member information may be disclosed. However, such disclosure is subject to strict safeguards put on its use and further disclosure by any third parties.

The CFFO collects member information to help fulfill the objectives and mandate of the organization. Among other things, the CFFO mandate and objectives includes determining the needs of its members and/or providing products, services and information to those members. In addition, the CFFO can permit affiliated organizations to provide products, services and information to members through third-party arrangements.

The CFFO will retain member information provided to it only as long as required under regulatory regimes, or in fulfilling the mandate and objectives of the organization.

Consent Requirement

The CFFO 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. Any applicable regulatory requirements are

exempt from the consent requirement. Persons not wishing to have us disclose their personal information in a particular way should notify the CFFO Privacy Officer and their wishes will be respected. In some cases, participation in certain programs and services which we may offer may not be possible where the necessary personal information is not made available or consent to disclosure is withheld.

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 CFFO may use and disclose such information without the party's consent. In such cases where the CFFO 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.

Website Policy

A visitor to the CFFO 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 may also be collected during any surveys but participants may indicate that they do not wish to receive any unsolicited electronic communication.

The CFFO'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 CFFO serve website users better. None of this information is retained after it has been used and is discarded in a secure manner.

Access To Personal Information

You have a right to access the personal information we have about you and to request that personal information you believe to be inaccurate be corrected. 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 CFFO's costs.

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 45 days of receipt at the CFFO office. The Privacy Officer may refer any unresolved matters to the CFFO. 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 February 28, 2005. The CFFO 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 CFFO's website or communicated to members through CFFO publications.

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