



Title <b>Privacy Policy</b>	Category <b>D. Conduct</b>	Policy <b>D3</b>
	Issued <b>2008-09-02</b>	Revised <b>2009-06-22</b>

## Policy

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Viterra is committed to protecting the privacy of personal information of its customers. This commitment includes ensuring that personal information is kept confidential, secure and accurate, and that it is managed and handled in accordance with applicable privacy laws.

Viterra's head office is located in Canada and, for this reason, this policy has been developed with a focus on compliance with Canada's *Personal Information Protection and Electronic Documents Act* (PIPEDA). However, given that Viterra maintains international operations, Viterra has also taken into account international privacy standards in the development of this policy, including the *EU Data Protection Directive 95/46/EC*. As a result, this policy presents a standard for privacy compliance that is applicable to Viterra, company-wide<sup>1</sup>.

This policy may be supplemented by specific policies, procedures and practices. This includes the Employee Information Privacy Statement, which is attached as Appendix A to this policy, that outlines Viterra's privacy practices with respect to personal information about its own employees.

## Policy Application

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This policy applies to all employees (which, for the purposes of this policy will include term, part-time and full-time employees), contractors, consultants, and staff of Viterra and its subsidiaries and affiliates ("Viterra Personnel"). Where any Viterra Personnel are subject to laws, regulations or industry guidelines that impose a higher standard of care regarding the protection of personal information, such Viterra Personnel will also comply with such additional laws, regulations or guidelines.

## Policy Standards

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### (a) Personal Information

The standards outlined in this policy will apply to all personal information in the custody and control of Viterra. For the purposes of this policy, "personal information" is defined as information about an identifiable individual, but does not include the name, title, business address or business

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<sup>1</sup> It is important to note that privacy laws vary by jurisdiction. The rights and obligations described in this policy may not be available to all individuals or in all jurisdictions. Viterra reserves all rights under applicable law.

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telephone number of an employee of an organization. Personal information may include general demographic information such as name, address, phone number, and date of birth; business specific customer information such as the products or services to which an individual subscribes, membership information, transaction information, customer account information and account status information.

Personal information does not include information that has been de-identified or rendered anonymous so as to prevent tracing of such information back to an identifiable individual.

**(b) Principles of Privacy Protection**

Viterra and Viterra Personnel must adhere to the following principles when handling, storing or managing personal information:

**(1) Accountability**

Viterra Personnel are accountable and responsible for the proper management of all personal information in their custody and control. Viterra has designated a Privacy Officer who is responsible for oversight of overall corporate privacy compliance, as well as interaction with specific business units within Viterra to enhance privacy compliance at a department level.

Viterra remains accountable for personal information accessed by or provided to third parties performing services on Viterra’s behalf. Personal information may be shared with agents or contractors of Viterra in connection with services that these individuals or entities perform for Viterra. All arrangements with third parties are protected through written confidentiality agreements or agreements containing appropriate confidentiality obligations, as applicable, to ensure that personal information can only be used for the purpose for which it was disclosed.

Although Viterra maintains operations in multiple jurisdictions, it is headquartered in Canada, with the result that personal information provided to Viterra will be transferred to and/or stored Canada. However, Viterra may also transfer personal information outside of Canada, including countries outside of the European Economic Area (EEA). Viterra Personnel must take reasonable steps to ensure that personal information transferred outside of Canada receives a comparable level of protection as within Canada. This means the personal information must be kept secure and may only be used in accordance with this policy, Viterra’s instructions and for the purposes for which such information was collected.

**(2) Purposes**

Viterra Personnel will identify the purpose for which they are collecting personal information prior to the collection of or at the time of collection of such information.

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Information will only be collected by Viterra for the following purposes unless consent is otherwise obtained:

- i. to establish and maintain a responsible commercial relationship with a customer and provide the customer with ongoing service (e.g. to confirm identity of a customer or to determine credit worthiness);
- ii. to understand customer needs and preferences and/or determine eligibility for products, services, loyalty programs, rebates and/or promotions (e.g. to provide customer service, create and maintain customer databases or facilitate market analysis based on records of purchases);
- iii. to recommend particular products and services, offered by Viterra or its carefully screened strategic business partners, to meet customer needs (e.g. to provide additional offers or incentives to customers regarding crop inputs based on purchase history);
- iv. to provide products or services to customers or carry out the intent of any contract entered into between Viterra and the customer (e.g. to purchase grain from a customer);
- v. to develop, enhance, market or provide products and services (e.g. to continue to tailor Viterra products and services to customer needs);
- vi. to manage and develop Viterra's business and operations (e.g. to guide new project development and resource allocation); and
- vii. to meet legal and regulatory requirements (e.g. to respond to a court order).

These same purposes will apply to the use of personal information.

### **(3) Consent**

Except as otherwise required or permitted by law, Viterra Personnel will use reasonable efforts to inform customers as to why their personal information is being collected and how it may be used or disclosed by Viterra.

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Except as otherwise permitted or required by law, Viterra Personnel will obtain consent from its customers to collect personal information from them, as well as to use and/or disclose such personal information for certain limited purposes.

Consent may be express or implied. The reasonable expectations of the customer are relevant to a determination of what form of consent is appropriate, and consent may be implied if doing so would be in accordance with reasonable expectations of the customer.

In general, the use of Viterra's products and services constitutes implied consent for Viterra to collect, retain, and use customer personal information for the purposes identified in this policy.

Subject to legal, regulatory and contractual requirements, consent may be withdrawn at any time on reasonable notice. Withholding or withdrawal of consent may, however, impact the products and services Viterra is able to provide to a customer.

In certain circumstances where collection, use or disclosure of personal information is permitted or required by law, Viterra Personnel may collect, use or disclose personal information without the customer knowledge or express consent.

Viterra's web site provides customer users with the opportunity to opt-out of receiving communications from Viterra and its subsidiaries, affiliates and allied businesses. Customers also have the option of contacting Viterra in writing or via e-mail to request removal of their information from Viterra's web site database so that they do not receive future communications and/or receive services offered through the web site.

#### **(4) Collection**

Viterra Personnel will limit the amount and types of personal information collected, and will only collect personal information that is reasonably required to fulfill a business purpose, communicate with a customer or satisfy legal requirements.

Viterra Personnel will collect personal information directly from customers where reasonably possible. Generally, personal information is only collected by Viterra if the customer supplies it voluntarily, for example through contacting Viterra via e-mail or phone, registering as a customer via Viterra's website or at a retail location, or applying for a product or service.

Although Viterra will generally collect personal information directly from the customer, Viterra may also collect personal information from other sources if appropriate or where otherwise authorized or required by law. Examples of third parties from whom personal may be collected include credit bureaus, credit reporting agencies, the Canadian Wheat Board and Land Titles registries.

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In order to improve customer service, Viterra may record customer calls and use the recordings for quality assurance and employee training and development. Customers will be informed via pre-recorded message that their call may be recorded for quality assurance purposes. After hearing this message, the customer's decision to continue with the call is considered their implied consent to record the call. Outbound calls to customers may also be recorded for similar purposes.

Messages and the information contained therein sent via Viterra's computer and communications systems are the property of Viterra and may be subject to electronic surveillance. As described in Viterra's Appropriate Use of Technology policy, such surveillance is conducted in the interests of promoting a healthy workplace and preventing misuse of Viterra-supplied or supported technology. All employees are expected to read and comply with this policy and their decision to transmit information via Viterra's computer and communication systems is considered their implied consent to the collection and use of information so transmitted by Viterra.

#### **(5) Use and Disclosure**

Viterra Personnel will use or disclose personal information collected about customers only as reasonably necessary for the purposes for which it was collected unless the customer provides consent to use or disclose it for another purpose, or if such use or disclosure is otherwise authorized or required by law. Viterra will retain personal information only for as long as it is required to fulfill the purpose for which it was collected or for such length of time as required by law, after such time it will be securely disposed of using methods such as secure shredding, deletion or data wiping.

For example, Viterra may use personal information of its customers to better understand their needs and how Viterra may improve its products and services. Use of personal information collected from customers may be necessary to fulfill an order, process and document business transactions, administer contest entries, offer rebates and benefits, verify creditworthiness, manage customer accounts or respond to inquiries with information about Viterra and its products and/or services.

Viterra may also determine if products or services of other Viterra divisions, subsidiaries, affiliates or other strategic business alliances may suit the needs of a customer and offer them to that customer. Viterra may use customer information to contact customers with marketing or promotional materials, or to assist front-line staff in providing tailored sales offers. Customers will be provided the opportunity to opt-out of receiving such communications from Viterra.

Legal requirements may also dictate that Viterra collect, process and disclose specific information and retain that information for historical and statistical purposes or to meet other legal requirements.

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Although, generally, Viterra does not disclose personal information to third parties, there are certain limited circumstances in which it may be necessary to do so. When personal information is provided to a third party, only that information that is specifically needed to fulfill the purpose for the disclosure is provided.

In some cases, Viterra may provide services or sell product lines jointly with allied businesses or contractors. Personal information may be shared with agents, third party service providers or contractors of Viterra in connection with services that these individuals or entities perform for Viterra. All such arrangements with third parties are protected through written confidentiality agreements or agreements containing appropriate confidentiality obligations, as applicable, to ensure that personal information can only be used for the purpose for which it was disclosed.

For purposes of credit reporting, credit verification and risk management, Viterra may exchange information about its customers with reputable reference sources and clearinghouse services.

Personal information may be transferred to other entities in the event of a change of ownership of all or a portion of Viterra's business or through a business combination such as a merger or joint venture. In such cases, Viterra will ensure that appropriate confidentiality agreements are in place so that such other entities agree to only use and disclose the personal information transferred to them in a manner consistent with this policy.

Viterra may also disclose personal information without knowledge or consent of the customer or employee if otherwise authorized or required by law (e.g. reporting of taxable earnings, compliance with WCB insurance obligations, debt collection) or if seeking the consent of the customer may defeat the purpose of the disclosure (e.g. investigation of a breach of an agreement, contravention of a law, or compliance with a court order).

**(6) Accuracy**

Viterra will take reasonable steps to keep personal information current, accurate and complete to support its use for the purpose for which it was collected.

**(7) Safeguards**

Viterra employs reasonable administrative, technical and organizational safeguards appropriate to the level of sensitivity of the information to protect the privacy and accuracy of personal information. These safeguards include a range of security measures designed to protect against the loss, misuse or unauthorized alteration of customer information.

For example, Viterra uses technical safeguards such as data encryption and individual computer user IDs and passwords linked to specific user privileges, administrative safeguards such as locked file storage cabinets, and organizational safeguards such as need to know access.

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**(8) Openness**

Viterra and Viterra Personnel will be open with customers about the policies and procedures Viterra uses to manage personal information, and will make information about same available to customers, including via Viterra’s website.

**(9) Access**

To the extent required by applicable laws, individuals may request access to the personal information that a Viterra holds about them. Where this right applies, it is not unlimited. Viterra reserves the right to withhold access to personal information to the extent authorized or required by law. Examples of where access to an individual’s own information may be refused include the situations where another individual’s personal information would be improperly disclosed or where the information would reveal Viterra’s confidential commercial information.

A formal request for access to personal information must be in writing and submitted to the Viterra Privacy Officer.

If a customer makes a written request for access to their personal information in the custody and control of Viterra, Viterra will respond to such request within a reasonable time (not to exceed any applicable statutory response time requirements) and inform the customer of what personal information Viterra has, what it is being used for and to whom it has been disclosed. In certain situations, however, Viterra may not be able to provide a customer with access to all personal information related to them that is in the custody or control of Viterra. In such cases, Viterra will explain the reason for this lack of access and any recourse the customer may have.

**(10) Amendment to Personal Information**

To the extent required under applicable laws, individuals may submit written requests to Viterra to correct errors or omissions in their personal information where that information is in Viterra’s custody or control.

All such requests must be in writing and submitted to the Viterra Privacy Officer.

In the event that an individual alleges inaccuracies, errors or omissions in the personal information in Viterra’s custody or control, Viterra will either:

- correct the personal information and, if reasonable to do so, send correction notifications to any other organizations to whom Viterra has disclosed the incorrect information; or

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- decide not to correct the personal information but annotate the personal information that a correction was requested but not made.

### **(11) Complaints**

In the event that a customer submits a written complaint regarding Viterra's compliance with this policy, Viterra will take appropriate steps to address the complaint, and if necessary investigate the complaint. Viterra Personnel will cooperate in any such investigation. A response will be provided to the complainant in all circumstances.

## **Information Technology Security**

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Viterra employs appropriate industry standards in information security to protect the personal information customers provide to Viterra via its web sites and portals, and the information it stores on its servers/networks.

Security measures used will include authentication tools, and advanced SSL encryption technology to protect the secure storage of personal information stored on Viterra's servers and networks and to protect against the unauthorized transfer of readable personal information to third parties. Viterra's web sites also use a digital secure server ID to provide increased protection to customers who interact with the company via the internet.

Viterra web sites may use cookies to track user traffic patterns<sup>2</sup>. A cookie file may contain information such as a user ID that the site uses to track the pages visited, but will only contain personal information that the user supplies him or herself. Viterra will not correlate information captured via cookies with information about individual users or customers, nor will it share this information with or sell it to any third party. Rather, Viterra uses this information to measure the number of visits a customer makes our web site, the average time spent on the site, the pages viewed, and other relevant statistics in order to tailor the visitor's experience at our web sites. Tailoring the visitor experience allows Viterra to improve the customer experience and Viterra's web presence, by displaying content to the customer that they might be interested in, displaying such content according to the customer's preferences, and measuring the use of web sites.

Customers visiting Viterra's web sites may choose not to accept cookies by setting their browser options to either inform them when cookies are being sent, or deny cookies outright. Viterra will

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<sup>2</sup> A cookie is a small data file that a web site may create and write to a computer's hard drive when a user visits the site. It is placed on the hard drive in the form of a small text file. Cookies may be used by the PC only while you are on a web site ("session cookies"), or may be re-read each time you return to the site that generated it ("persistent cookies").

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not require the use of cookies to provide information and/or services to customers via the web, but employing these settings may limit web site functionality.

## Policy Changes

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Viterra's privacy policy is regularly reviewed to ensure that Viterra continues to serve the privacy interests of its customers, and to ensure that Viterra is employing industry standard best practices in managing privacy compliance. This policy should be revisited and examined from time to time to ensure awareness of any revisions to this policy.

## Contact

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Questions regarding Viterra's privacy policy, the security of personal information, or compliance with PIPEDA should be directed to Viterra's Privacy Officer, Kristal Allen, or your manager.

Customers should be encouraged to contact Viterra in writing via e-mail at [viterra.privacy@viterra.ca](mailto:viterra.privacy@viterra.ca) , or via letter/note to the following address:

Privacy Officer  
 Viterra Inc.  
 2625 Regina Avenue  
 Regina, Saskatchewan  
 S4T 7T9

## Approvals:

Original Policy Date: September 2, 2008	Approved by: SRVP & General Counsel/Corporate Secretary
Revision Date: October 9, 2009	Application: All Managers, Supervisors and Staff

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## APPENDIX A

### Employee Information Privacy Statement

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This employee privacy statement is a supplement to the Viterra Privacy Policy. It outlines how Viterra's Privacy Policy applies in the context of personal information about Viterra employees and potential employees.

#### Application

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For the purposes of this statement, "personal employee information" means personal information about an employee or potential employee of Viterra that Viterra collects, uses or discloses for the purposes of establishing, managing or terminating an employment relationship with Viterra.

This statement only applies to personal employee information.

#### 1. Accountability

Viterra is responsible for personal employee information under its control, including any personal employee information transferred to third parties for processing, storage or other similar purposes (for example, payroll processing, off-site storage of personnel files, etc.). Where personal employee information is shared with such third parties, Viterra takes reasonable steps to ensure that such third parties are bound by appropriate agreements or other measures to protect the confidentiality of the personal employee information.

Viterra may transfer personal employee information to other countries, including countries outside of Canada or the European Economic Area (EEA). Viterra will take reasonable steps to ensure that personal information transferred outside of the EEA or Canada receives a comparable level of privacy protection as within Canada and the EEA.

Viterra has designated a Privacy Officer who is responsible for oversight of overall corporate privacy compliance, as well as interaction with specific business units within Viterra to enhance privacy compliance at a department level.

#### 2. Purposes

Viterra limits the amount of personal employee information it collects to what Viterra considers reasonably necessary for the purposes of establishing, managing or terminating an employment relationship with Viterra.

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Some examples of the purposes for which personal employee information is collected by Viterra in the ordinary course of business include the following:

**(a) Recruitment Process**

Viterra collects personal information from individuals who apply for, or are otherwise recruited for, employment at Viterra. Examples of the types of personal information typically collected by Viterra from applicants include the following:

- Information contained in or provided with the applicant’s resume and/or application form
- Information provided by references, whether the reference is provided by the applicant or is obtained independently by Viterra
- Information gathered by Viterra in order to verify information provided in an application or resume. For example, Viterra may verify the information provided about education, certifications, etc.
- Information gathered in connection with background checks (civil and criminal)
- Information collected during interviews

Written authorization for Viterra’s collection, use and disclosure of certain of the items listed above may be obtained from the applicant as part of the recruitment process.

Personal information collected from job applicants is used by Viterra only as is reasonably necessary for the purposes of assessing the applicant’s suitability for employment at Viterra.

**(b) Basic Employment Information**

Upon being hired at Viterra, Viterra will maintain a personnel file relating to the employee. Examples of some of the basic information that an individual’s personnel file may (but not necessarily in each case) contain include the following:

- Resume and/or application form
- Other information gathered as part of the application process
- Letters of offer and acceptance of employment
- Written employment contract

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- Payroll/salary information, including social insurance number (required by law for tax purposes), banking information (necessary for direct deposit), RRSP information, etc.
- Wage/salary/compensation information
- Information gathered and relating to the application and processing of employee benefits, such as short and long-term disability, medical/dental care, life insurance, pension, etc.
- Emergency contact information

The information listed above is required principally to ensure one or more of the following:

- That the employee is properly identified as an employee of Viterra
- That the employee is on the payroll
- That the employee is able to receive employment benefits to which the employee is entitled or has elected
- That Viterra is able to make appropriate notifications in the event of a work related or other emergency situation

### **(c) Performance Information**

Performance information is collected and maintained so that Viterra can properly evaluate employee performance, determine appropriate levels of compensation and make employment related decisions about an employee (including decisions regarding promotions, transfers, demotions, recognition, remuneration and termination).

Examples of performance information that may be collected and included on an employee's personnel file throughout the course of employment include:

- Formal and informal performance appraisals
- Internal communications regarding performance
- Information gathered in respect of investigations into workplace performance activities or incidents
- Information gathered for the purposes of disciplinary action or termination of employment

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- Performance improvement plans
- Information gathered for the purposes of administering, monitoring and documenting vacation leaves, sick days or other leaves or absences from work

**(d) Health Information**

Viterra may collect personal health information about employees in connection with the following:

- A workplace injury or other health related incident. This information is collected for the purpose of responding to the injury/incident and for the purpose of meeting legal responsibilities pursuant to, among other things, applicable Workers Compensation and Occupational Health and Safety legislation
- Processing short/long term disability claims and other health related benefits plans
- Responding to requests for accommodation

**(e) Computer and E-mail Usage Records**

All communication and activity on our computer and communication systems is the property of Viterra and is subject to electronic surveillance through computer technologies. As such, Viterra may collect information about an employee's e-mail, Internet or other activity using Viterra computer and communication systems. Please refer to Viterra e-mail and Internet usage policies for further details in this regard.

**(f) Other**

Viterra may also collect personal employee information for the purposes of the following:

- To protect Viterra from fraud, theft or other willful misconduct
- To comply with various legal requirements
- To monitor, document, assess, communicate and address adherence to Viterra policies, procedures and practices
- Where applicable, to engage in collective bargaining and to administer collective agreements
- To provide employee training and education

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### 3. Consent, use and disclosure of personal employee information

Viterra uses or discloses personal employee information as reasonably necessary for the purposes of establishing, managing and terminating the employment relationship, as may be further described in this statement. By applying for and/or accepting employment with Viterra, potential employees and employees are considered to have consented to the collection, use and disclosure of their personal information for such purposes.

Viterra will not use or disclose personal employee information for a purpose other than the purpose for which the information was collected unless:

- The employee consents to such new use or disclosure; or
- The new use or disclosure is otherwise authorized or required by law. Examples where this may be the case include (among others) the following:
  - Where Viterra is required to respond to a subpoena, production order or similar legal order
  - Where Viterra is required to comply with a garnishee summons
  - Where the information is used or disclosed for the purposes of a lawful investigation or legal proceeding

Some specific examples how Viterra may disclose personal employee information to third parties include the following:

- Personal employee information may be shared with third parties involved in processing, administering and adjudicating benefits claims. For example, employee personal health information may be shared between Viterra's human resources department and third-party providers (for example, benefits providers) who need to know for the limited purposes of processing short and long term disability claims and facilitating an employee's return to work.
- Viterra may, if contacted, provide reference information to other employers with whom a former employee may have applied for work after leaving employment with Viterra.
- Personal employee information may be transferred to other entities in the event of a change of ownership of all or a portion of Viterra's business or through a business combination such as a merger or joint venture. In such cases, Viterra will ensure that appropriate confidentiality agreements are in place so that such other entities agree to only use and disclose the personal employee information transferred to them in a manner consistent with this statement.

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Viterra retains personal employee information only as long as it is reasonably required to ensure an effective employment relationship or as required by law. Information that is not required by law will be regularly reviewed and routinely destroyed when it is no longer reasonably required for business purposes.

#### **4. Accuracy**

Viterra uses reasonable efforts to keep personal employee information up-to-date, accurate and relevant for its intended use. Subject to applicable laws, Viterra will correct or amend personal employee information found to be inaccurate or incomplete.

Viterra employees are responsible for advising Viterra of any inaccuracies or changes to their personal employee information (e.g. change of address, telephone number, marital status or other lifestyle changes that affect benefits status, etc.).

#### **5. Safeguards**

Viterra has in place reasonable security processes and procedures to help keep personal employee information safe, including (where appropriate):

- Physical security measures such as restricted access and locked filing cabinets.
- Electronic security measures for computerized systems such as password protection and limited access to certain databases.
- Organizational processes such as limiting access to personal employee information to a selected group of individuals who have a strict need to know.

#### **6. Openness**

Viterra will be open with customers about the policies and procedures Viterra uses to manage personal employee information, and will make information about same available to employees and potential employees.

#### **7. Access**

Viterra will provide access to an individual's own personal employee information to the extent required by applicable laws.

Formal requests for access to an individual's own personal employee information must be made in writing and directed to the Viterra Privacy Officer.

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Within 30 days of receiving such a request, Viterra will either:

- Provide the individual with access to his/her own personal employee information; OR
- Provide the individual with the reasons for not providing access (for example, because more time is needed to respond to the request or because the information contains references to other individuals, is subject to solicitor-client or privilege, or other legal basis exists to deny access).

## **8. Questions and Complaints**

Viterra will respond in a timely manner to your questions, concerns and complaints about the privacy of personal employee information and Viterra's privacy policies and procedures.

Employees should be encouraged to contact Viterra's Privacy Officer, Kristal Allen, with any such questions, concerns or complaints. Employees may also contact Viterra in writing via e-mail at [vittera.privacy@vittera.ca](mailto:vittera.privacy@vittera.ca), or via letter/note to the following address:

Privacy Officer  
 Viterra Inc.  
 2625 Regina Avenue  
 Regina, Saskatchewan  
 S4T 7T9