



GS1 Canada Statement of Privacy

Privacy Statement Copyright Information

GS1 Canada, ECCnet Registry, ECCnet ProSYNC® and ECCnet ProLYNC® are registered trademarks of GS1 Canada.

GS1 Canada respects your privacy and complies with Canada's *Personal Information Protection and Electronic Documents Act (PIPEDA)*. As the custodian of your data, data associated with GS1 Canada services are protected by Canada's robust privacy laws, including in cases where the global nature of GS1 Canada services results in your data being stored in other jurisdictions. In cases where GS1 Canada contracts with data processors that reside outside of Canada, GS1 Canada remains accountable under PIPEDA for the protection of personal information transfers to other jurisdictions. GS1 Canada takes this responsibility seriously and will make reasonable efforts to protect and ensure security of GS1 Canada subscribers' data.

This GS1 Canada Privacy Statement applies to GS1 Canada and affiliated websites and services.

This policy describes the information GS1 Canada collects, how we use that information, and with whom we share the information. If you have additional questions, please contact us at info@gs1ca.org.

A) Policy Respecting Individual Corporate Information

Collection of Your Individual Corporate Information

GS1 Canada develops a Subscriber Profile for all companies that are subscribers in good standing. The Subscriber Profile includes, but is not limited to: names, addresses, email addresses, subsidiaries and divisions, company products and brands, Global Trade Item Numbers (GTINs), Global Location Numbers (GLNs) and Company Prefix Licences. While you are not obligated to provide all of these details to GS1 Canada, we may not be able to provide

you with an appropriate level of service or process your subscription application without this company information.

For companies that are not active GS1 Canada subscribers in good standing, we collect basic contact information, such as name, telephone and fax numbers and email address to keep companies informed of GS1 Canada programs and services. This information is often submitted through event registrations and other information gathering processes.

Use of Your Individual Corporate Information

Your Individual Corporate Information may be used to:

- 1) Provide you with our services, including GS1 Canada services, as well as manage and administer those services and your account;
- 2) Maintain and develop our business systems and infrastructure;
- 3) Gain an understanding of your business needs by conducting surveys;
- 4) Inform you of other products and services offered by GS1 Canada;
- 5) Respond to communications from you or send information that you have requested, such as our electronic newsletters.

We may also use your Individual Corporate Information to promote and market other products and service offerings, which we deem to be of interest to you. If you do not wish to receive any communications, contact us at info@gs1ca.org.

Furthermore, GS1 Canada uses a web activity analysis tool to monitor traffic on our website. We use the aggregate information that we gather to help us evaluate the effectiveness of our website and to make improvements to its structure and content in order to better address the needs of our Subscriber community and of the Canadian industry.

If the contact information in our files is incorrect or out-of-date, you can update your individual corporate information online via your Subscriber Profile.

Distribution of Information to Third Parties

We do not sell, trade or disclose any individual company information derived from our website to unauthorized third parties. GS1 Canada subscribers in good standing and other authorized users receive access to the following information within the Subscriber Profile database: contact name, title, address, telephone, fax, email address, product category and brands, Company Registration Numbers GTINs, GLNs, and Company Prefix Licences.



GS1 Canada uses only aggregate industry information gathered from this database (e.g. address, phone number) in communications to third parties.

GS1 Canada may access and/or disclose your individual corporate information if required to do so by law or in the good faith believe that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on GS1 Canada or our website; (b) protect and defend the rights or property of GS1 Canada including, but not limited to, ECCnet Registry, ECCnet Image & Validation and a GDSN solution (c) act under exigent circumstances to protect the personal safety of subscribers of GS1 Canada, its website or the public.

B) Policy Respecting Personal Information

I. INTRODUCTION

The purpose of this Privacy Statement is to identify the types of personal information collected by GS1 Canada, to specify the purposes for which that information is collected, the uses to which it may be put and the extent to which it may be disclosed to others.

This Privacy Statement also describes the security appropriate for each type of personal information held and the duration for which that information will be held. Finally, it identifies how any person whose information we hold may review that information and may, if not satisfied with either the content or these policies, place a complaint to a designated individual.

GS1 Canada recognizes that it is responsible for the personal information it collects and holds. These procedures are intended to assure all parties that personal information receives the protection required by the Personal Information Protection and Electronic Documents Act and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates, hereinafter referred to as "the Act".

In general, we collect, use and disclose information subject to the limitations provided for in the Act. Due to basic differences in the collection, use and disclosure of information on subscribers, third parties and employees, these types of information are described separately.

II. SUBSCRIBER INFORMATION

At the most general level, GS1 Canada collects information:



- For the purpose of establishing and maintaining contact with subscribers and suppliers, and
- For such purposes as are required by the nature of the matter in respect of which we are engaged.

Our sites use cookies to collect and store certain information. A cookie is a data file transferred to your device that allows us to maintain your unique preferences when visiting and navigating our sites. The information collected is anonymized and technical in nature and includes, time of access, browser information and in some cases device information. We use this information for internal business purposes (related to analytics) and to ensure that the applications you use to access our websites and services are optimized for user experience and you consent to these uses.

We use different types of cookies, including:

- User input cookies
- Authentication cookies
- analytics cookies

You can choose how cookies are handled by your device through your browser settings. Each browser has different options, so we recommend that you locate the "Help" menu within your browser to learn about how to change your cookie preferences. If you choose not to receive cookies at any time, the website may not function properly and certain features may not be available.

We do not use any social plugins within in our website.

A. Information collected for the purpose of establishing and maintaining Subscriber contact

To establish and maintain Subscriber contact, GS1 Canada receives general contact information, including: business address, telephone and fax numbers and email addresses. In certain cases, and when the information is volunteered by the subscriber, we collect additional details. The information relates to business activities rather than personal details; however, we still consider the data confidential, as set out in this Privacy Statement.

This information is used to maintain subscriber contact through such activities as direct marketing. Information is not disclosed to third parties unless required for the purposes of a particular retainer. In no case is the subscriber information sold or transferred to third parties for valuable consideration. This information is maintained by GS1 Canada on a password-protected server.

GS1 Canada maintains the information for an indefinite period of time. We ask that subscribers who wish to maintain contact with us provide us with updated information, as



necessary. We endeavour to update our records within a reasonable amount of time after receiving such information. Any subscriber who wishes to have personal information deleted from our records may request such a deletion; GS1 Canada will comply with all such requests within a reasonable timeframe.

B. Information collected for such purposes as are required by the nature of the matter in which GS1 Canada is engaged

We collect information relating to subscribers for various purposes, depending upon the nature of our engagement. As previously stated, we consider that the information relates to business activities, not personal information. However, we still treat such information as confidential, as set out in this Privacy Statement.

We collect contact details required to maintain contact with the subscriber or subscriber representative for the purposes of gathering information related to our engagement, providing services and forwarding accounts for payment.

In some cases, we are required to collect information relating to the educational and financial status of subscribers for purposes connected with the engagement.

Such contact information may be disclosed to third parties as necessary to advance the objective of the engagement (e.g. trading partners are notified of subscriber terminations due to subscription non-payment), or as required by law. Please note that credit card information is not retained at GS1 Canada and therefore will not be disclosed.

This information is maintained in confidential files for a period of at least six years after completion of the engagement and only in relation to which it was collected.

Third Party Information

We collect information relating to persons who have relevant connections to our operations. In some cases, we are required to collect information relating to the educational and financial state or condition of such persons for purposes connected with the retainer.

Such contact information is disclosed to third parties as necessary to advance the objective of the retainer or as required by law.

This information is maintained in confidential files for a period of at least six years after completion of the engagement and only in relation to which it was collected.

Employee Information

We maintain information for purposes of personnel administration and information that is required from time to time by taxation authorities and providers of benefits under group benefit plans maintained by the organization and its employees. We retain this information indefinitely.

a) Personnel Administration

While gathering applications for employment, GS1 Canada collects information from candidates, including contact details and relevant educational and work experience. We normally retain this information after a decision has been made unless an unsuccessful candidate asks us not to retain the information.

We collect information relating to the job history of employees up to the date of hire. During the course of employment we collect and retain work evaluations, attendance data and records respecting compensation history. We also collect and maintain contact information respecting relatives and next-of-kin.

This information is used for employer-employee communications and in connection with our continuing evaluation of personnel requirements and performance assessment. It is kept in secure files to which only Human Resources and senior administrative personnel have access. We do not sell or transfer this information to third parties for valuable consideration.

b) Tax Authorities

In connection with our obligations under taxation statutes, we collect employees' personal information, including current address, date of birth and social insurance number.

We use and disclose this information for the purposes specified by taxation legislation. It is kept in secure files to which only senior administrative personnel receive access.

c) Group Benefit Plans



In connection with the administration of medical benefit plans for staff, we collect personal information, including current address, date of birth, social insurance number and marital status. We also collect certain personal details relating to the dependants of partners and employees.

Administration of Personal Information Policy and Complaints

An officer of GS1 Canada, as designated from time to time by the Executive Committee, is responsible for ensuring that this Privacy Statement is applied.

Subject to the comments below respecting restrictions to the right of access, aggregate information is available upon request. More detailed requests that require archive or other retrieval costs may be subject to payment of reasonable charges and disbursements.

Any person shall have a right to request any correction that he or she deems appropriate.

However, a person's right to request access to information is not absolute. GS1 Canada may deny access where denial is required by law, where the information in question relates to existing or anticipated legal proceedings, where granting a right of access would result in an unreasonable intrusion to the privacy rights of other persons, where granting a right of access would prejudice ongoing negotiations and where the request is frivolous or vexatious.

Any person who is not satisfied with the response they receive to a request for access shall be entitled to complain further by filing a notice with the [Privacy Officer](#). The notice should state why they are dissatisfied with either any detail of this Privacy Statement or the response to any request to correct personal information held by GS1 Canada.

C) Policy Respecting Security of your Individual Corporate Information and Personal Information

GS1 Canada is committed to protecting the security of your Individual Corporate Information and personal information. We use industry standard security technologies and procedures to help protect your Individual Corporate Information and personal information.

In the event that GS1 Canada becomes aware of any loss of, unauthorized access to, or unauthorized disclosure of your Individual Corporate Information or your personal information, and it is reasonable in the circumstances to believe that the breach creates a

real risk of significant harm to an individual, GS1 Canada will, as soon as feasible, do the following:

1. notify you of the privacy breach via email, telephone, or another appropriate form of communication;
2. provide you with sufficient information to understand the significance of the breach and to take steps, if possible, to reduce the risk of the harm that could result from the privacy breach and/or to mitigate that harm;
3. report the privacy breach to the Office of the Privacy Commissioner of Canada; and
4. take all reasonable steps to remediate the privacy breach or to minimize any damage resulting from the privacy breach.

GS1 Canada will keep and maintain a record of every privacy breach, in accordance with any requirements prescribed by privacy laws, for two years

Changes to this Privacy Statement

GS1 Canada reserves the right to make changes to this Privacy Statement to reflect adjustments to our website. As a result, we recommend that you visit this page periodically to review its contents.

Please note that GS1 Canada is not responsible for the content or privacy practices of other websites to which our website links.

Any person may, upon request and with reasonable notice, review this policy and request access to their own personal information within GS1 Canada's files. Any questions or requests for access should be directed to info@gs1ca.org.

Last reviewed: March 2020