



GS1 CANADA PRIVACY POLICY

Dated as of November, 2018

Introduction

GS1 Canada understands the importance of the protection of the privacy of the personal information of individuals and the importance of security of confidential information of all types.

GS1 Canada manages the collection of all information in accordance with Canada's *Personal Information Protection and Electronic Documents Act* (PIPEDA).

GS1 Canada generally collects only regular business card information such as name, title, business address, business email and business phone number (business card information). Business card information is not considered personal information under PIPEDA nor by GS1 Canada.

GS1 Canada requires only business card information in order to provide users with services and access to the GS1 Canada website. GS1 Canada presumes that information disclosed by users is limited to business card information unless notified by the user.

As a member of the global GS1 organization, GS1 Canada participates in, and provides services that, facilitate the sharing of business card information regarding users.

In the event that personal information other than business card information is collected by GS1 Canada, the below policy applies, which sets out GS1 Canada's approach to the collection, use and disclosure of personal information and security of confidential information of all types.

Please note that GS1 Canada reserves the right to update or change this privacy policy at any time by posting an updated policy on its website(s) or as made available through the services. The most current version of this policy will govern GS1 Canada's use of users' personal information. By continuing to access the GS1 Canada website(s) or services after changes are made to this policy, you agree to be bound by the revised terms.

Purposes of Collection

GS1 Canada collects information for the following purposes:

- (a) to provide users (each a “user”) of GS1 Canada services with services including administration and account management, as well as access to the GS1 Canada website(s);
- (b) to inform the user of other products and services offered by GS1 Canada; and
- (c) to respond to user communications or to send information requested by users including GS1 Canada’s electronic newsletters.

In addition to the above purposes, GS1 Canada uses a web activity analysis tool to monitor traffic on the GS1 Canada website(s). GS1 Canada uses the aggregate information gathered to help GS1 Canada evaluate the effectiveness of the website, to improve the services and to make improvements to its structure and content in order to better address users’ needs.

Use and Disclosure of Personal Information

Personal information submitted to GS1 Canada, including through GS1 Canada’s website(s), is kept strictly confidential unless disclosed in accordance with a user’s express consent or legal requirements. In all cases, the provision of personal information by users who register on the GS1 Canada website(s) is voluntary: any personal information provided by a user is submitted at the user’s discretion. Please note that revoking your consent may result in not being able to access or utilize certain functionality on the GS1 Canada website.

GS1 Canada may use third party service providers with respect to its website(s) and services and users’ personal information may be shared with such providers. GS1 Canada requires that any third party provider that has access to personal information be bound by obligations consistent with this policy and that such providers only collect, use or disclose users’ personal information for the purposes of providing the GS1 Canada services. Additionally as part of its services and GS1 Canada’s ordinary course of business, your contact information may be shared with your trading partners (e.g. through a GS1 Canada portal) or with other GS1 member organizations and its members.

Personal information provided by a user will not be traded or sold to outside organizations unless in accordance with your implied or express consent. GS1 Canada reserves the right to contact any user at any time to forward information, respond to questions or provide notification of any changes to our program or our policies.

GS1 will disclose personal information only if consent is given by the relevant individual or:

- (a) when permitted or required by law, such as in response to a subpoena or other legal process;
- (b) to a transferee of all or part of GS1;
- (c) to GS1 Canada service providers in accordance with below; or
- (d) to meet legal obligations, including but not limited to regulatory reporting obligations.



Accountability

GS1 has designated a Privacy Compliance Officer to handle privacy matters and inquiries regarding personal information. For contact information, please see the end of this Policy.

Links to Other Sites

GS1 Canada does not assume either responsibility or control over the content, security, accessibility or accuracy of sites to which we may provide links. When leaving GS1 Canada's website(s), please check the privacy policy and security certificates for the site you are visiting before sharing information.

Cookie Policy

The GS1 Canada website(s) uses cookies to collect and store certain information. A cookie is a data file transferred to the user's device that allows GS1 Canada to maintain the user's unique preferences when visiting and navigating the GS1 Canada website(s). The information collected is anonymized and technical in nature and includes, time of access, browser information and in some cases, device or network information (e.g. an IP address or the manufacturer of a mobile device used to access the applicable GS1 Canada service or website). GS1 Canada uses this information for internal business purposes (related to analytics) and to ensure that the applications used to access the GS1 Canada website(s) and services are optimized for user experience and the user consents to these uses.

GS1 Canada uses different types of cookies, including:

- (a) User input cookies
- (b) Authentication cookies
- (c) Analytics cookies

Users can choose how cookies are handled by their device through their browser settings. Each browser has different options, so GS1 Canada recommends that users locate the "Help" menu within their browser to learn about how to change their cookie preferences. If users choose not to receive cookies at any time, the website(s) may not function properly and certain features may not be available.

GS1 Canada does not use any social plugins within in our website.

Protecting Confidential Information, including Personal Information

GS1 Canada protects confidential information of all types, including personal information, with organizational, physical, mechanical and electronic safeguards appropriate to the sensitivity of the information. Note that credit card information is not retained at GS1 Canada and therefore will not be collected or disclosed.



Access, Questions and Concerns

An individual may submit a written request to access or correct his or her personal information retained by GS1 Canada.

All correspondence should be sent to the following address:

GS1 Canada Privacy Compliance Officer
1500 Don Mills Road
Suite 800
Toronto, ON M3B 3K4

Email: PrivacyOfficer@gs1ca.org

Version 1.0 November 2018

