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## GS1 CANADA PRIVACY POLICY

### 1. Introduction

GS1 Canada is committed to upholding the privacy rights of subscribers and users of our services. This policy explains how we collect, use, share and safeguard personal information with respect to the services we provide.

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

GS1 Canada generally collects only business contact information such as name, title, business address, business email and business phone number (Business Card Information). Business Card Information is not subject to protection as personal information.

GS1 Canada presumes that contact information disclosed by users is limited to Business Card Information unless notified by the user. Users are advised not to provide GS1 Canada with any personal information such as through screen captures or through the myGS1 user portal.

### 2. Who we are

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. Our data registry services are operated jointly by a network of national GS1 member organizations and the GS1 Global Office, as further detailed here: <https://www.gs1.org/contact/overview/alphabetical>

### 3. Consent

By using our website and/or providing information to us, you consent that all personal information that you provide can be processed by us in the manner and for the purposes described in this Privacy Policy and as permitted by applicable laws.

### 4. Updates

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.

### 5. Personal information we may collect

We may collect the following information about you, which we have grouped together as follows:

- **Business Card Information** includes your name, business address, business name, email address, telephone number, or similar identifier that you provide us.
- **Voice Recordings** associated with calls made to and by our team and information related to the call that you share with us on the call.
- **Usage Data** includes information about how you use the services.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting, location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the services.

As you interact with our services, we may automatically collect Usage Data as well as Technical Data about your device, browsing actions and patterns as specified above. We collect this information by using cookies (see section titled, *Cookies*). We may also collect, use, and share anonymized data such as statistical data for any purpose. We do not treat anonymized data as personal information since it cannot directly or indirectly identify you.

## 6. Purposes of collection

GS1 Canada collects information for the following purposes:

- (a) to provide users (each a “user”) of GS1 Canada 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;
- (c) to respond to user communications or to send information requested by users including GS1 Canada’s electronic newsletters;
- (d) to help maintain the safety, security, and integrity of our services, databases and other technology assets, and business;
- (e) to respond to law enforcement requests and other requests as required by applicable law or court order;
- (f) to improve our products and services;
- (g) to carry out our obligations and enforce our rights; and
- (h) for any other purpose with your consent.

GS1 Canada also collects data on interactions with our web-based services, such as IP address and data about your device’s geolocation, operating system, browser, and security status. This information is used in aggregate to improve user experience and service capabilities and to limit risk.

GS1 Canada collects voice recordings for the purposes of monitoring quality of staff performance, enforcing our rights, investigating, and resolving complaints, identifying training needs and detecting, investigating, and preventing crime.

## 7. Disclosure of your information

We do not sell, rent or otherwise disclose your personal information to any third party, except as described in this policy.

### a) Third party processors and GS1 network of organizations

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. For example, we may contract with service providers to host our servers, provide security, software maintenance

and development services. GS1 Canada requires that any service 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 GS1 Canada services. Additionally, as part of its services and GS1 Canada's ordinary course of business, your contact information may be shared with our trading partners (e.g. through a GS1 Canada portal) or with other GS1 member organizations and its members.

## **b) Compliance with applicable laws and legal proceedings**

GS1 may disclose your information:

- (a) where we are permitted or required by law, by a governmental body or by a law enforcement agency, such as in response to a subpoena or other legal process;
- (b) to establish or exercise our legal rights or defend against legal claims;
- (c) to investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violation of our terms of use;
- (d) to meet legal obligations, including but not limited to regulatory reporting obligations.

## **c) Other recipients**

We may also disclose your information to a transferee of all or part of GS1.

## **8. Provincial and international transfers**

Personal information we manage may be transferred, processed, and stored outside your province and country of residence, including in United States. While we take measures to ensure protection of your personal information, your personal information may be shared with governments, courts and law enforcement or regulatory agencies in the jurisdictions in which your personal information is transferred, processed and/or stored, where required by the laws of those jurisdictions or where required to enforce our legal rights.

## **9. Accountability**

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

## **10. 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.

## **11. Cookies**

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 Usage Data/Technical Data as described above. 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 you are concerned about the use of cookies, you can disable or block them from your browser. If users choose to block or disable 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(s).

## **12. Protecting personal information**

GS1 Canada protects confidentiality of personal information. We use security safeguards appropriate to the sensitivity of the information and protect personal information against loss, theft, as well as unauthorized access, disclosure, copying, use or modification. We use physical, organizational as well as technological measures to protect personal information.

## **13. Retention**

GS1 Canada retains personal information only as long as necessary to fulfill the purpose(s) for which such information was collected unless longer retention is required under the law. Once no longer required, we dispose of or destroy personal information in a safe and secure manner.

## **14. Withdrawing your consent**

You may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us using the contact information below. Please note that if you withdraw your consent, we may not be able to provide you with certain services. We will explain the impact of withdrawing your consent to help you make a decision.

## **15. Access, questions and concerns**

You may contact us using the contact information below if: (a) you have any questions or comments about our Privacy Policy; (b) wish to make a complaint; or (c) wish to submit a written request to access or correct your personal information retained by GS1 Canada.

All correspondence should be sent to the following address:

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

Email: [PrivacyOfficer@gs1ca.org](mailto:PrivacyOfficer@gs1ca.org)