

Privacy Policy

Rowe Farm Meats Ltd. ("Rowe Farms") respects your privacy and will only collect, use and disclose your personal information in accordance with this Privacy Policy.

This Privacy Policy outlines the type of personal information that is collected by Rowe Farms, why and how it is collected, how Rowe Farms uses and discloses the information, what safeguards are in place, how to change or withdrawal personal information and who to contact with privacy-related questions.

1. INTRODUCTION

This Privacy Policy applies to Rowe Farms and its personnel, representatives and agents. As used in this Privacy Policy Rowe Farms does not include resellers or distributors of Rowe Farms products and/or services. Rowe Farms shall comply with Canadian federal and provincial legislation as it is enacted and applicable privacy legislations in jurisdictions where Rowe Farms carries on business.

2. WHAT PERSONAL INFORMATION DOES ROWE FARMS COLLECT?

"Personal Information" as used in this Privacy Policy means information that specifically identifies an individual and is provided to, or collected by, Rowe Farms and its' staff or by Rowe Farms' agents, associates and affiliates on behalf of Rowe Farms.

"Personal Information" however, does not include an individual's name, business title or business contact information in their capacity as an employee.

3. WHY DOES ROWE FARMS COLLECT PERSONAL INFORMATION?

Rowe Farms and its agents, associates and affiliates may collect, use and/or disclose Personal Information for one or more of the following purposes:

- to develop, enhance, market, sell, provide and inform individuals or businesses of Rowe Farms products and services;
- to update and verify Rowe Farms databases and information provided by third parties;
- to monitor communications to ensure the consistency and quality of the products and/or services of Rowe Farms, its affiliates, suppliers, distributors, retailers and any other third parties with whom Rowe Farms has a commercial relationship;
- with respect to individual service providers, suppliers, distributors and retailers, to (1) consider whether Rowe Farms or any of its affiliates should establish or continue a commercial relationship, including without limitation, to extend credit and to evaluate credit standing and to match credit bureau and/or credit reporting agency information, to check references and to confer with banking institutions; and (2) establish and maintain commercial relationships to provide products and/or services, administer accounts, make and receive payments, facilitate product delivery and returns and fulfill contractual obligations;
- to conduct research and statistical analysis;
- to distribute Rowe Farms Newsletters, promotional information and any other information to individuals who have voluntarily enrolled in our mailing lists and/or emailing lists
- to detect and protect Rowe Farms and other third parties against error, negligence, breach of contract, fraud and other illegal activity and to comply with Rowe Farms' audit requirements and to audit compliance with Rowe Farms' policies, procedures, laws and contractual obligations;

- to engage in business transactions that may involve the sale or transfer of personal information, including the purchase, sale, lease, merger, amalgamation or financing involving Rowe Farms or its affiliates, any particular brand, product line or business unit;
- as permitted by, and to comply with, any laws or regulations; and
- for any other purpose to which an individual consents - all reasonable steps will be taken to ensure that the new purpose is identified prior to actual use of the information

4. HOW DOES ROWE FARMS COLLECT PERSONAL INFORMATION?

Wherever possible Rowe Farms will collect personal information directly from the individual(s) concerned. In some cases, when deemed necessary, we will ask an independent source to verify and supplement personal information.

5. HOW DOES ROWE FARMS DEFINE CONSENT?

Your submitting of Personal Information to Rowe Farms means that you agree and consent that Rowe Farms can collect, use and disclose your Personal Information in compliance with this Privacy Policy. Rowe Farms will not collect, use or disclose Personal Information without requisite consent, except in certain extraordinary circumstances. Such extraordinary circumstances shall include without limitation, when legal, medical or security reasons make it impossible or impractical to obtain consent or where it is otherwise in the individual's best interest.

At any time, subject to legal and contractual requirements and reasonable notice, you may refuse or withdraw your consent. It is important to note that if you refuse or withdraw your consent, Rowe Farms may not be able to provide or continue to provide, products, services and/or information which may be of value to you. An individual from Rowe Farms will advise you of the implications of such refusal or withdrawal.

To withdraw consent please contact the Chief Privacy Officer in writing:

Rowe Farm Meats Ltd.
105 Roncesvalles Ave.
Toronto, Ontario
M6R 2K9

Attn: Privacy Officer

6. HOW DOES ROWE FARMS USE AND DISCLOSE PERSONAL INFORMATION?

In addition to the purposes identified in Section 3, from time to time Rowe Farms may use or disclose Personal Information to:

- a person, who in the reasonable judgement of Rowe Farms is providing or seeking the information as an agent of the subject individual;
- service providers retained by Rowe Farms to perform functions on its behalf, such as advertisers, market researchers, delivery contractors, website administrators, data processing, information technology and office services, provided such organization or individual does not collect, use or disclose the personal information for any other purpose other than to perform such functions or provide services to Rowe Farms; or
- any third party where the subject individual consents to such collection, use or disclosure, or as required or permitted by law.

7. HOW DOES ROWE FARMS LIMIT THE COLLECTION AND RETENTION OF PERSONAL INFORMATION?

Rowe Farms limits the collection of Personal Information to that which is necessary for the purposes identified in this Privacy Policy as same may be amended from time to time, or for any additional purpose identified before the collection of the Personal Information. As well, Personal Information is not used or disclosed for purposes other than those for which it was originally collected, except with consent or as otherwise permitted by law.

Rowe Farms will retain Personal Information only for so long as it is needed to fulfill the purposes for which it was obtained and to meet any other legal requirement, statutory or otherwise, from time to time.

8. HOWS DOES ROWE FARMS ENSURE ACCURACY OF PERSONAL INFORMATION?

Rowe Farms strives to ensure that Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. Rowe Farms does not routinely update Personal Information therefore we rely on the individual to notify us of any changes to their Personal Information. To update Personal Information please contact the Chief Privacy Officer in writing:

Rowe Farm Meats Ltd.
105 Roncesvalles Ave.
Toronto, Ontario
M6R 2K9

Attn: Privacy Officer

9. HOWS DOES ROWE FARMS ENSURE SAFEGUARDS OF THE PERSONAL INFORMATION?

Rowe Farms endeavours to maintain adequate safeguards to protect against loss, theft, unauthorized access, disclosure, copying, use or modification of Personal Information in the care of the Rowe Farms.

10. HOW DOES ROWE FARMS ENSURE ACCOUNTABILITY OF PERSONAL INFORMATION AND OPENNESS AND ACCESS TO PERSONAL INFORMATION?

Rowe Farms is responsible for the Personal Information under its control and has appointed a Chief Privacy Officer to oversee our efforts to comply in all material respects with applicable privacy legislation and the terms of this Privacy Policy. The Chief Privacy Officer and those designated by the Chief Privacy Officer (the "Privacy Team") address and investigate questions or concerns regarding Personal Information.

To reach the Chief Privacy Officer or a member the Privacy Team, please call 416-532-3738. A copy of this Privacy Policy is available at www.rowefarms.ca and any future updates or amendments will be posted as they occur.

Rowe Farms will provide individual's access to their Personal Information and have the right to request that any inaccurate information be amended or corrected. Rowe Farms has the right to refuse a request for access to Personal Information if:

- The information is protected by legal privilege;
- Granting access would reveal confidential information pertaining to Rowe Farms;
- Doing so would reasonably be expected to threaten the life or security of another individual;
- The information would likely reveal personal information about another individual;
- The information would prejudice negotiation with you; or
- To protect Rowe Farms' rights and property.

II. CHALLENGING COMPLIANCE

We encourage you to discuss any privacy issues with the Chief Privacy Officer at:

Rowe Farm Meats Ltd.
105 Roncesvalles Ave.
Toronto, Ontario
M6R 2K9

Attn: Privacy Officer

12. CHANGES TO THIS PRIVACY POLICY

Rowe Farms will from time to time review and revisit privacy practices and this Privacy Policy. In the event of any material amendment, an appropriate notice will be posted on our Website. You are encouraged to contact Rowe Farms to establish if any updates have been made to this Privacy Policy, which can be ascertained by the date listed at the top of this Privacy Policy. All updates and amendments to this Privacy Policy can be found at www.rowefarms.ca.

13. ROWE FARMS WEBSITE

Our Web site may contain links to other sites, which are not governed by this Privacy Policy. On our Web site, like most other commercial Web sites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.