

## **JVK PRIVACY POLICY**

### Scope and Application of the JVK Privacy policy:

The JVK Privacy policy applies to Personal Information about JVK employees and non-employee persons who interact with JVK, that is collected, used or disclosed by JVK.

- Employees includes both past and present employees.
- Non-employee persons includes individuals and corporations, who are customers, suppliers, job applicants, and Internet users who access the JVK website.

The JVK Privacy policy applies to the management of Personal Information in any form, whether it be oral, written, or electronic.

JVK reserves the right to amend this Privacy policy from time to time.

Exclusions: The Privacy policy does not restrict the collection, use or disclosure of the following information:

- Information that is publicly available, such as a person's name, address, telephone number, e-mail address.
- Business contact information such as name, title, business address or telephone number of an employee of an organization.

JVK has designated a Privacy Officer to oversee compliance with the Privacy policy. The Privacy Officer can be reached at 1894 Seventh St., St.Catharines, Ontario, L2R 6Z4.

### Purposes for Collection of Personal Information:

JVK collects Personal Information for the following purposes:

- For non-employee persons, verifying creditworthiness, completing sales transactions, responding to your requests for products and information, better understanding your horticultural needs, and including you in marketing programs.
- For employees, processing payroll, administering employee benefits, confirming employment and verifying income for third parties, such as a bank.
- To manage and develop its business and operations, including personnel and employment issues.

### Obtaining Consent for Collection, Use or Disclosure of Personal Information:

JVK will make every effort possible to ensure employees and non-employee persons understand how their Personal Information will be used by JVK.

JVK will obtain consent, whether implied, as discussed below, or express, before or when it collects or uses Personal Information.

JVK may collect, use or disclose Personal Information without employees and non-employees knowledge or consent if required by law to do so.

In general, the use of products and services by a non-employee person, or the acceptance of employment or benefits by an employee, constitutes implied consent for JVK to collect, use, or disclose Personal Information.

An employee or non-employee person may withdraw consent at any time, subject to legal restrictions and reasonable notice. JVK may be contacted for more information regarding the implications of withdrawing consent.

JVK may use or disclose Personal Information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.

JVK may also collect Personal Information from other sources, including credit bureaus, employers or personal references, or other third parties that represent that they have the right to disclose the information.

### Limiting Collection, Use, Disclosure and Retention of Personal Information

JVK shall limit the collection of Personal Information to that which is necessary for the purposes mentioned above.

JVK shall not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the Person or as required by law.

JVK shall retain Personal Information only as long as necessary for the fulfillment of the purposes for which it was collected, or as long as is required by law.

JVK may disclose Personal Information about employees in the following instances:

- for personnel and benefits administration.
- providing references for former employees.
- where disclosure is required by law.

JVK shall restrict access to all Personal Information to only those employees whose duties require access for business reasons.

JVK shall maintain reasonable systems and procedures for Personal Information records retention, and subsequent destruction when no longer needed.

JVK shall update Personal Information as and when necessary to fulfill the identified purposes.

#### Security Safeguards

JVK shall protect Personal Information against such risks as loss or theft, unauthorized access, copying, modification or destruction, through appropriate security measures, regardless of the format it is held.

All employees with access to Personal Information shall be required as a condition of employment to maintain strict confidentiality.

#### Access to Privacy Policy and Personal Information

Upon request JVK shall inform an employee or non-employee person of the content, use and disclosure of their Personal Information.

Upon request JVK shall provide access to that information, in addition to making changes to any information that is determined to be inaccurate.

An employee or non-employee person can access their Personal Information by contacting the JVK Privacy Officer.