



## **CCA-BIXS Personal Information Protection Policy**

This Personal Information Protection Policy applies to the collection, use and disclosure of personal information related to the Beef InfoXchange System (BIXS). "Personal information" means any information about an identifiable individual, but does not include the name, title or business address of an employee of an organization.

In accordance with the *Personal Information Protection and Electronic Documents Act*, the CCA-BIXS has established the following privacy principles.

**Accountability** - the CCA-BIXS is responsible for maintaining and protecting personal information under its control. Each employee of the CCA-BIXS is responsible for the personal information under his or her control. Our employees are informed about the importance of privacy and receive information periodically to update them about our Personal Information Policy.

**Purpose in Collection of Personal Information** – the CCA-BIXS is a data and information exchange system allowing for the movement of individual beef cattle production, performance, genetic, health, carcass and other data and information up and down the beef supply chain linked to the animal's unique RFID ear tag. Personal information is required as part of the registration process for participation in this national voluntary program in order to establish a primary business location and profile and for the system to validate specific claims pertaining to animals and management among other attributes; in particular, as per the data sharing agreement between CCA and CCIA, in the submission to and or validation of data held in your CCIA account pertaining to animal date of birth and date of birth method and CCIA (RFID) Tag ID numbers. The CCA-BIXS also collects and uses personal information in order to keep BIXS participants informed on news, developments, offers and opportunities related to CCA-BIXS that may be of interest to participants in CCA-BIXS. Also in relation to notifying participants of specific issues or anomalies that arise in relation to the data they submit; and in responding to specific inquiries received from participants, including an inquiry received by e-mail; and, for general management and reporting purposes within CCA-BIXS.

The personal information that the CCA-BIXS may collect includes:

- First and last name
- Address
- Telephone and/or fax number
- E-mail address
- CCIA account #

**Consent** – the CCA-BIXS is a consent-based program where the participant’s personal information is kept confidential unless participants specifically consent to share their personal information and specifically what personal information they consent to share. By indicating they agree to the Terms and Conditions for BIXS Participation and by completing the Information Sharing Consent For BIXS Participants, CCA-BIXS participants therein agree to all conditions set out in this CCA-BIXS Personal Information Protection Policy.

**Limitations on the Collection, Use, Disclosure and Retention of Personal Information** - Most of the information we collect about BIXS participants comes directly from them when they complete the CCA-BIXS registration and information sharing consents. In some cases, however, information about a participant comes to CCA-BIXS from third parties they have authorized to act on their behalf in CCA-BIXS and the CCIA. A participant’s personal information will be used according to guidelines explained above in the ‘Purpose in Collection’ segment of this document. Their personal information will be kept secure and confidential within the CCA-BIXS database unless they so choose to share that information via completion of the Consent To Share Information document. A standard internationally recognized premise identifier (Global Location Number - GLN) is created within BIXS. The GLN is not being provided to satisfy any regulatory requirements. It is a free service offered to BIXS participants, which may permit BIXS to assist participants in the future and for the participant’s own personal use. Acquiring this GLN requires sharing some personal information with GS1 – a not-for-profit association (<http://www.gs1.org/>). The GLN will appear in the participant’s business account within BIXS. The only other means by which a BIXS participant’s personal information could be released would be through Court Order through normal court of law process yet abiding with the *Personal Information Protection and Electronic Documents Act*. While the BIXS participant’s personal information will be kept secure unless they consent to share that information, as per the Terms and

Conditions For BIXS Participation, the CCA-BIXS maintains the right to enter into agreements with other entities enabling analysis and reporting on aggregate BIXS population data within which some of their animals would be represented. However, the user's personal information would not be associated with this data.

If the CCA-BIXS has collected personal information solely as a result of someone visiting the CCA-BIXS Web site or of someone making an inquiry to CCA-BIXS by telephone, letter or email, CCA-BIXS will only disclose that information to those deemed necessary to fulfill the request or inquiry or as part of a court process. For instance, if an individual sends us an email message that includes personal information (such as their name included in the "address"), we will use that information to respond to their inquiry. Data transmitted within CCA on its private network (or Intranet) is not encrypted, nor are e-mail communications leaving the CCA network. It is important to remember that communication via the Internet is not secure.

**BIXS Participant's Access to Their Personal Information** - It is important to ensure the accuracy of any personal information CCA-BIXS has on file. Generally speaking, BIXS participants are entitled to know what personal information CCA-BIXS has about them, and to change that information if it is inaccurate or out-of-date. The personal information CCA-BIXS has about participants can be found in their BIXS business account profile, which they or their third party access via the participant's account username and password. We encourage all CCA-BIXS participants to check their profile to ensure the personal information is accurate and to update that information as necessary in the future.

**Other Peoples' Access to Information** - The circumstances under which authorized access to information from outside CCA-BIXS through disclosure by consent to CCA-BIXS are described earlier in this Personal Information Protection Policy document. Additional measures to safeguard personal information are described here. Personal information is protected by security safeguards deemed appropriate to the sensitivity level of the information housed in the database. CCA-BIXS has made every reasonable effort to protect personal information against loss or theft, as well as unauthorized access, disclosure or modification. The precautions taken by CCA-BIXS include, but are not limited to:

- Access to personal information by CCA staff is restricted to those staff members who require access in the performance of their

- duties. These staff have signed confidentiality agreements.
- All data exchanges on CCA-BIXS run through a Secure Socket Layer (HTTPS) which are cryptographic protocols providing security for communications over networks.
  - The CCA-BIXS computer systems are password-secured and constructed in such a way that only authorized individuals can access our systems and databases.
  - The CCA and CCA-BIXS computer server and portal, respectively, are located in separate secure locations, guarded continuously and protected by firewall and access controls. The stability of the systems is assured by a UPS (uninterruptible power supply) and hardware redundancy features built into the servers. Industry-standard virus software is installed on the network and all desktop computers.
  - Database clustering and nightly backups are performed on all systems with backup tapes being stored securely for disaster recovery purposes.

You should be aware that due to the fact that CCA contracted with an American based company to develop the software for data entry into our Canadian based database, an issue was evident with respect to the extra-territorial reach of the U.S. Patriot Act, an act focused on deterring and preventing terrorism. The CCA has engaged U.S. legal counsel to analyze the potential impact of the act on BIXS. It is the opinion of the legal counsel that the risk of the U.S. Government accessing data held in BIXS under the Patriot Act is low due to the lack of "significant purpose" to seek such access. Additional measures have been taken to isolate, protect and reduce the risk of BIXS data being exposed to a production order under the Act. This includes ensuring that labour resources managing and administering the data in the BIXS database are Canadian citizens.

**Complaints and Suggestions** - Questions or complaints with respect to the Personal Information Protection Policy outlined above or about CCA-BIXS' privacy practices can be directed to CCA-BIXS' Privacy Officer by telephone at 1-403-275-8558, by fax at 1-403-274-5686, by email at [bixs@cattle.ca](mailto:bixs@cattle.ca) or by mail to: 310, 6715 – 8<sup>th</sup> St NE, Calgary, AB T2E 7H7. The CCA will promptly investigate all complaints concerning compliance with this Personal Information Protection Policy. If a complaint concerning compliance with this Personal Information Protection Policy cannot be resolved the complaint will be investigated promptly. If concerns have not been addressed satisfactorily, the CCA will provide information on other complaint procedures that may be

available.

**Updating this Policy** - CCA-BIXS reserve the right to add, modify or remove portions of this Personal Information Protection Policy when we feel it is appropriate to do so. To determine when this policy was last updated referring to the modification date below.

Last updated – December 5, 2010