

## UFA Website Privacy Commitment

At United Farmers of Alberta Co-operative Limited and our subsidiaries (collectively "UFA"), we are committed to maintaining the accuracy, confidentiality and security of your personal information. UFA has adopted a Privacy Policy, supported by a series of Privacy Commitments in order to address the specific privacy concerns of certain groupings of individuals.

We have developed this *UFA Website Privacy Commitment* to describe our privacy policies and practices and how we collect, use and disclose the personal information of those individuals who visit our websites. We have developed other documents that describe our privacy policies and practices with respect to our employees and with respect to our customers, suppliers and other parties with whom we interact. Our *UFA External Privacy Commitment* is available at <https://www.ufa.com/privacy-policy>.

If you are unsure of which Privacy Commitment applies to you, please contact our Privacy Officer for more information.

### Privacy Commitment Effective for Canada

It is UFA's policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and / or an individual's right to privacy are different from one jurisdiction to another. This Privacy Commitment covers only those activities that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

This Privacy Commitment has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Commitment may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Commitment applies to you, please contact our Privacy Officer for more information.

### What is Personal Information?

For the purposes of this Privacy Commitment, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications.

### What Personal Information Do We Collect?

You can visit our websites without telling us who you are or revealing any information about yourself, including your e-mail address. Our web servers may collect information related to your visit to our websites, including the IP address and domain used to access our websites, the type and version of your browser, the website you came from to access our websites, the page you entered and exited at, any website page that is viewed by that IP address and what country you are from. We use this information to monitor our websites' performance (such as number of visits, average time spent, page views) and for our business purposes such as working to continually upgrade our website

In addition, we collect the personal information that you submit to our website, such as your name, address and any other contact or other information that you choose to provide by:

- using the "contact us" portion of this website;
- applying for a position with UFA through this website;
- by corresponding with a representative of UFA via e-mail using the hyperlinks created for that purpose;
- when registering through myUFA; or
- when shopping online at UFA through ufa.com.

Where you request information from us, we may use the e-mail address that you provide to send you information about offers on products and services that we believe may be of interest to you.

If you have requested or consented to being added to an e-mail mailing list to provide you with certain information on a regular basis, or if we send you information about our offers on products and services by e-mail, you may ask us to remove you from the list at any time (using the unsubscribe instructions provided with each e-mail and on the site where you signed up).

## **How Do We Use Cookies?**

When you visit our websites, we may place a "cookie" on the hard drive of your computer to track your visit. A cookie is a small data file that is transferred to your hard drive through your web browser that can only be read by the website that placed the cookie on your hard drive. The cookie acts as an identification card and allows our websites to identify you and to record your passwords and preferences. The cookie allows us to track your visit to the websites so that we can better understand your use of our websites so that we can customize and tailor the websites to better meet your needs.

Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (1) notify you prior to a website placing a cookie on your hard drive so that you can decide whether or not to accept the cookie; or (2) automatically prevent the placing of a cookie on your hard drive. It should be noted that if cookies are not accepted, you will not be able to access a number of web pages found on the website.

## **Google Analytics**

Our websites may use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). The information generated by the cookie about your use of our website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. Further information about Google's privacy policy may be obtained from <http://www.google.com/privacy.html>.

## **Hotjar**

In addition, our websites may use Hotjar in order to better understand our users' needs and to optimize our website services and experiences. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile.

For further details, please see the 'about Hotjar' section of Hotjar's support site.

## **What about Links to other Websites?**

Our websites may contain links to other websites that may be subject to less stringent privacy standards. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites.

UFA is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.

### **Why Do We Collect, Use, and Disclose Personal Information?**

The personal information collected is used and disclosed for our business purposes, including for those purposes explained in this *UFA Website Privacy Commitment* and in our *UFA Personal Information Privacy Commitment* available at <https://www.ufa.com/privacy-policy>.

Your personal information is shared with our employees, contractors, consultants, affiliates and other parties who require such information to assist us with establishing, maintaining and managing our relationship with you. In addition, personal information may be disclosed or transferred to another party in the event of a change in ownership of, or a grant of a security interest in, all or a part of UFA.

For example, UFA's affiliates and service providers may provide certain information technology and data processing services to us from time to time so that we may operate our business, and as result, your personal information may be collected, used, processed, stored or disclosed in Canada and the United States of America.

We may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

### **Your Consent is Important to Us**

By using our websites, we assume that you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Commitment.

You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Officer using the contact information set out below. In some circumstances, a change in or withdrawal of consent may severely limit our ability to provide products or services to, or acquire products or services from, you.

All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

Please call us at our Integrity Hotline at 1-877-258-4605 or e-mail us at [Integrity.Hotline@UFA.com](mailto:Integrity.Hotline@UFA.com).

### **How is Your Personal Information Protected?**

UFA endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while our websites strive to protect your personal information, we cannot warrant the security of any information you transmit to us, and you do so at your own risk. Once our websites receive your transmission, we make commercially reasonable efforts to ensure its security on our systems.

The security of your personal information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

## **Updating Your Personal Information**

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes.

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

## **Access to Your Personal Information**

You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information, please contact our Privacy Officer using the contact information set out below. Please note that any such communication must be in writing. For information on accessing your information, please see our *UFA Personal Information Privacy Commitment* at <https://www.ufa.com/privacy-policy>.

In the event that we cannot provide you with access to your personal information, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions.

## **Inquiries or Concerns?**

If you have any questions or concerns about our Privacy Policies please contact our Privacy Officer by telephone, in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

Privacy Officer  
Suite 700, 4838 Richard Road S.W.  
Calgary, Alberta T3E 6L1

Please call us at our Integrity Hotline at 1-877-258-4605 or e-mail us at [Integrity.Hotline@UFA.com](mailto:Integrity.Hotline@UFA.com).

## **Revisions to this Privacy Commitment**

UFA from time to time, may make changes to this Privacy Commitment to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this Privacy Commitment on our website <https://www.ufa.com/privacy-policy> and we encourage you to refer back to it on a regular basis. This Privacy Commitment was last updated on November 12, 2020.

## **Interpretation of this Privacy Commitment**

Any interpretation associated with this Privacy Commitment will be made by our Privacy Officer. This Privacy Commitment includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'.

This Privacy Commitment does not create or confer upon any individual any rights, or impose upon UFA any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Commitment and Canada's federal and provincial privacy laws, as applicable, this Privacy Commitment shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.