

# CSI PRIVACY CODE

## Introduction

The Canadian Seed Institute's (CSI) privacy commitment is based on the provisions of the Personal Information Protection and Electronic Documents Act (PIPEDA). We follow the ten interrelated principles that are the foundation of PIPEDA to compose our Privacy Code.

**Accountability:** The CSI is responsible for the personal information under its control and has designated Privacy Officers who are accountable for the CSI's compliance with the ten privacy principles.

**Identifying Purposes:** The CSI will identify the purpose for which personal information is collected at or before the time of collection.

**Consent:** The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate.

**Limiting Collection:** The collection of personal information shall be limited to that which is necessary for the purposes identified by the CSI. Personal information shall be collected by fair and lawful means.

**Limiting Use, Disclosure, and Retention:** CSI will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. CSI will retain personal information only as long as necessary for the fulfillment of those purposes.

**Accuracy:** Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

**Safeguards:** The CSI will protect personal information by security safeguards appropriate to the sensitivity of the information.

**Openness:** The CSI will, upon request, make available to individuals specific information about CSI policies and practices relating to the management of personal information.

**Individual Access:** CSI will, upon request, inform an individual of the existence, use and disclosure of his or her personal information and shall give access to that information

**Challenging Compliance:** An individual shall be able to address a challenge concerning compliance with the above principles to the CSI's Privacy Officer.

## *Identified Purpose*

At the Canadian Seed Institute, we are committed to providing service and to ensuring that the relationship with our clients is conducted with integrity in a dependable, reasonable, sincere and fair manner. In delivery of its services the CSI collects personal information for the following purposes:

- i. To establish and maintain a responsible relationship with you, the CSI collects basic information from its clients and assessors to confirm your identity and business contact information. This information is used to maintain an effective relationship with you.
- ii. To determine that all standards and procedures are being followed. The CSI reviews assessment reports submitted by assessors to ensure that CSI standards and program requirements are being met.
- iii. To manage, develop, maintain, and improve our operations.
- iv. To distribute newsletters, documents, and certification documents
- v. To understand your needs. From time to time, we may ask you to participate in surveys that provide us with important information about the effectiveness of the CSI for you and your company.

# CSI PRIVACY CODE

## ***Consent***

Your consent is implied if we ask you to provide personal information with a stated purpose such as accreditation of personnel or registration of a facility. For example, without your address, we cannot send renewal notices, newsletters, or documentation.

You may limit your consent to our collection, use or disclosure of your personal information at any time. Please note that the withdrawal of your consent may change the way in which the CSI is able to interact with you.

## ***Information the CSI Collects and Method of Use***

Listed here are some examples of the ways that we collect information about you and how we use it.

**Application:** The information on the application form contains personal information such as the client's address. This information is needed as the client will be billed annually for their renewal and for mailing of technical updates and newsletters

**Assessment/Audit Report:** When you have an assessment, the assessor/ auditor/ inspector provides us with their report for review. With this information we can update our records for your address, e-mail, telephone and fax number if changes are warranted. We also make note of any personnel and name changes. We send this information to the CFIA so they can update their records. The information in the report also helps the assessor and reviewer determine if the client meets the standards and follows procedure. This information allows the assessor/ auditor to recommend the client to the certification body or to a government agency.

**Agreement:** In order for a client to be accredited with the CSI, they must sign an agreement. The agreement is a legal documentation that notifies clients of their terms of agreement with the CSI.

**Recommendation:** This document is needed in order to be accredited with the CSI. The recommendation ensures that an assessor has verified that the facility complies with the specific program Standard. It contains the scope, applicant name, and assessor signature.

**Application form for Increased Interval:** If a client is eligible for the increased interval program, they are sent an application form. This form ensures that our records are up-to-date and there have not been any changes since the last assessment.

**Invoice:** Our invoices are sent out annually; generally in November. The client may adjust the invoice and notify the CSI of these changes. This way our database is up-to-date and the next year we can invoice accordingly.

**CSI Operator and Grader Information:** With the invoice a report listing the operator and graders is included. The client may review the listing and change the information. All changes are forwarded to the CFIA (or certification body) to ensure the registrar is also current.

**Participate in Questionnaires:** From time to time, we may run questionnaires to gather information on how our clients think we are doing. We appreciate our clients input and suggestions which will be utilized by the CSI to make improvements to our services. We encourage clients to participate in any surveys, or to contact us by phone, fax, Email or letter with comments.

# CSI PRIVACY CODE

## ***What personal information does the CSI disclose?***

The CSI may be required to disclose personal information about individuals in certain situations, including the following:

- i. To an agency to which CSI provides accreditation or inspection services, such as the Canadian Food Inspection Agency and the Canadian Grain Commission, and which has agreed to handle the information in accordance with our policies and the applicable legislation.
- ii. To a person whom the CSI reasonably believes to be acting as the individual's agent.
- iii. To a public authority, or its agent, to the extent required to comply with legal or regulatory requirements.
- iv. To an assessor or auditor who requires information to perform an assessment/audit.
- v. A listing of registered facilities is posted on the CSI Website but it does not include email addresses.

## ***How does the CSI Protect My Information?***

The security of your personal information is very important to the CSI. Our office has taken appropriate measures to safeguard your personal information from unauthorized access, disclosure, use, or tampering. Although we cannot take responsibility for any theft, misuse, unauthorized disclosure, loss, alteration or destruction of data by a third party, we take reasonable precautions to prevent such unfortunate occurrences.

## **Your Rights**

### ***Accessing your personal information***

We will honour any reasonable requests you make to review, update or correct any of your personal information that is held by the CSI. Please note that invoices and the operator grader information sent out yearly contain all personal information and this is a great opportunity to make note of any changes.

You could refuse to allow us to obtain, use or share your personal information or you could also withdraw a previously given consent at any time. However, by doing so, depending on the situation, you may be limiting or even preventing our ability to provide you with the service or product you desire.

### ***Requesting an update or correction***

If you believe that any of your personal information is inaccurate, you may ask us to correct it. We will respond to your request to update or correct your personal information within 30 days of the request being made.

### ***Registering complaints***

In the event of any conflict or other concern regarding access to, or the accuracy or our use of, your personal information, you may register a question or complaint with our Privacy Officer.

# CSI PRIVACY CODE

## Contact Information and Resources

If you wish to access your personal information, change your consent to the ways in which we may use your personal information, have a complaint about our Privacy Policy or the manner in which we may have handled your personal information, or if you have any questions about our Privacy Policy, please contact us as follows:

Canadian Seed Institute  
Suite 200 – 240 Catherine Street  
Ottawa, ON  
K2P 2G8  
Telephone: 613-236-6451  
Toll Free: 1-800-516-3300  
Fax: 613-236-7000  
e-mail: [csi@storm.ca](mailto:csi@storm.ca)

You can also contact the Information and Privacy Commissioner of Ontario at 1-800-387-0073 or visit its website [www.ipc.on.ca](http://www.ipc.on.ca) for more information on privacy laws in Ontario.

## Changes to this Privacy Policy

In order to ensure that our Privacy Policy is kept up to date, we reserve the right to change it from time to time. Notice of changes to the Privacy Policy may be posted on the CSI website. ([www.csi-ics.com](http://www.csi-ics.com))

## Visiting the CSI Website

You do not have to reveal any personal information while visiting our CSI Website ([www.csi-ics.com](http://www.csi-ics.com)). Personal information is not collected during your visit to our site. We will not send you any unsolicited electronic communication.