



PRIVACY POLICY CODE

Scope

This privacy code applies to Kin's Farm Market. It outlines the principles and commitments we make to you, our customer, and employees.

Definitions

"Kin's Farm Market" - refers to all companies doing business as Kin's Farm Market™ and Energanic™.

"Consent" - Voluntary agreement with what is being done or proposed. Consent can be either express or implied. Express consent is given explicitly, either orally or in writing. Express consent is unequivocal and does not require any inference on the part of Kin's Farm Market. Implied consent arises where consent may reasonably be infer from the action or inaction of the individual.

"Personal Information" - information about an identifiable individual that is recorded in any form such as age, ID numbers, income, ethnic origin, opinions, evaluations, comments, social status, disciplinary actions, employee files, medical records, existence of disputes, intentions, home phone number and home address.

"Personal Information" does not include workplace contact information such as name, position or title, work address, work telephone, work fax number, and work email.



PRIVACY STATEMENT

This is our statement of privacy and security principles we follow at Kin's Farm Market.

This code explains what happens to information that you submit to us. At any time you may request to see exactly what information Kin's Farm Market has retained related to your personal information. At any time you may request that we remove your personal information from our files and databases unless required to be retained by law.

Even within Kin's Farm Market, only those people that require your information will have access to that information. It is important for us at Kin's Farm Market to make you feel comfortable at our stores, offices and/or website.

Contact

Occasionally, we may contact you via email, postal mail or telephone to notify you of new services or products available through Kin's Farm Market and to ask you about how satisfied you are with Kin's Farm Market' products and services. However, it is possible to browse our website without providing us any information. Any data that we might collect is used to enhance your experience at our stores and/or website.

Video Cameras

Our stores and head office have video cameras on site. The video cameras are used to protect our stores and offices from theft and for security of staff and customers. Taped activities are stored for review up to one week unless we require further investigation by law.

Website Tracking

We collect and store information on visitors only in the aggregated sense and use it to see how many people visit our website.

Email

Our website does allow you the opportunity to contact us via email. Your email address, and any other information your email header shows about you, such as your name or organization, will be revealed to us in the email.

When you communicate with us via email, we will use your email information only for the specific purpose of responding to your comments, questions or job application. Your email address will not be sold, nor will it be shared with others unless we are required to do so by law.

Some promotions, contests and sweepstakes at Kin's Farm Market may be sponsored by third party companies. In such cases, personal information from you may be collected. If you do not want your personal information handled by companies other than Kin's Farm Market, you can choose not to participate in the promotional contests or sweepstakes.

We reserve the right to share information among our affiliates for business purposes.



We are committed to informing you of the purpose behind collecting the personal information that we ask from you. We are committed to honest and open communication and we will make your personal information available to you upon request at any time. Any personal information that we collect is for our business purposes only.

As a customer, if you are unhappy with our privacy statement you can discontinue using our service at any time and subject to legal requirements, request that any personal information be removed completely from Kin's Farm Market.

Employment

Kin's Farm Market collects and uses personal information from employees and job candidates for the following primary purposes:

Recruitment, administration of compensation, benefit and employee incentive plans, income tax reporting and other legal requirements, providing leaves of absence, and contacting employees for business purposes.

The purpose of collecting information from employees and job candidates are identified at the time of collection, as well as how it is used and it is disclosed.

This is provided through printed materials; internal and external website.

At times it is necessary to disclose some personal information about employees to outside agencies such as Canada Customs and Revenue Agency and payroll service providers, and benefits plan broker to meet legal requirements for payroll processing and benefits administration. We take all reasonable steps to ensure the privacy of personal employee information when it is disclosed to third parties.



PRIVACY NOTICE

Personal Information Collection, Use, Disclosure & Consent

Kin's Farm Market collects, uses and discloses personal information with its customer's and employee's consent and as required by law.

Personal Information

Personal information is information about an identifiable individual but does not include workplace contact information such as name, position or title, work address, work telephone, work fax number, and work email.

Collection, Use and Disclosure of Your Personal Information

In order to efficiently offer and provide quality products and services to Kin's Farm Market's customers/employees, Kin's Farm Market must collect, use and disclose personal information in relation to its customers and employees.

Kin's Farm Market will only collect, use and disclose the personal information necessary for its day-to-day administration, Cheque Cashing Card, Refunds, Reward Programs and to enable Kin's Farm Market to:

- understand the needs of customers, their preferences and to establish and maintain a commercial relationship with customers of Kin's Farm Market and to provide customers with ongoing service,
- determine the demand for products which Kin's Farm Market makes available for sale to customers,
- provide you with information about products and services offered by Kin's Farm Market, and
- enable Kin's Farm Market to more efficiently and effectively operate, manage and develop its business.

Kin's Farm Market will disclose and transfer personal information to its agents for processing and to assist Kin's Farm Market in its day-to-day business activities and administration. Kin's Farm Market will safeguard and maintain the security and confidentiality of the personal information provided by its customers/employees.

Kin's Farm Market's customers/employees may at any time request their own personal information, subject to any restrictions at law, and may request correction of inaccurate or incomplete personal information.

Kin's Farm Market will collect, use and disclose customer's/employee's personal information in a manner which complies with legal requirements.



If personal information is gathered orally, the representative of Kin's Farm Market will provide an oral explanation of the purpose and collection and use.

PRIVACY POLICY

Kin's Farm Market respects the privacy of its customers and employees. In this regard, Kin's Farm Market follows practices consistent with the Canadian Standards Association's Model Code for the Protection of Personal Information which code contains ten (10) fair information principles generally described as follows:

1. **Accountability** -An organization is responsible for personal information under its control designating a representative(s) responsible for its compliance with such principles.
2. **Consent** -The consent of an individual is required for the collection, use or disclosure of personal information unless otherwise permitted by law.
3. **Identifying Purposes** -The purpose for which personal information is collected shall be identified on or before the time the personal information is collected.
4. **Limiting Collection of Personal Information** -The collection of personal information shall be limited to that which is necessary for the identified purposes.
5. **Limiting Use, Disclosure and Retention of Personal Information** -Personal information shall only be used or disclosed for the purpose for which it was collected unless otherwise allowed by law. Such personal information shall also only be retained as long as is necessary for the fulfillment of such identified purposes.
6. **Accuracy** -Personal information collected shall be as accurate, complete and up to date as is necessary for the identified purposes.
7. **Safeguards and Safekeeping** -Personal information shall be secured at a level appropriate to the sensitivity of the personal information.
8. **Openness** -An organization shall make available information about its practices pertaining to the management of personal information.
9. **Individual Access** - An individual shall be informed of the existence, use and disclosure of their personal information and shall be given access to such personal information. Such individual shall be entitled to query the accuracy and completeness of the personal information as well as have such personal information amended.
10. **Challenging Compliance** -An individual shall be entitled to challenge concerns they may have with respect to an organization's compliance with the fair information principles contained herein.



CONTACT INFORMATION

If you have any questions or complaints about our privacy policies, your inquiry should be made in writing to:

 Kin's Farm Market - Head Office

Attention: **Privacy Officer**

#16 - 11191 Horseshoe Way

Richmond, B.C.

V7S 4S5

 humanresources@kinsfarmmarket.com

Specific details about the inquiry or complaint must be provided. All complaints will be investigated by the Privacy Officer and will be responded to within 30 days of receiving the complaint. The Privacy Officer will take steps to resolve the situation should the complaint be justified.

Administration fee may be charged for public (non-employee) requests for access to personal information.

If the privacy officer is not able to address a complainant's concerns, the issue may be escalated to the office of the CEO or the British Columbia Privacy Commissioner.

**We reserve the right to change this privacy policy code from time to time.
The date of change will be provided.**

This policy was updated on March 17, 2004