The UFA Personal Information Commitment

At United Farmers of Alberta Co-operative Limited ("UFA"), privacy of your personal information is important to us. We collect and use personal information about you to create, maintain and enhance a relationship that allows us to deliver top-quality, value-added products and services to both our members and customers.

At UFA we have always made every effort to protect the personal information that you provide to us - this commitment provides formal documentation to you on our policies governing personal information.

We've based our UFA Personal Information Commitment on the Canadian Standards Association's 'CSA Model Code'. This model code has been generally accepted as the standard that companies are to meet and complies with the federal government's privacy legislation, the "Personal Information Protection and Electronic Documents Act" and Alberta's "Personal Information Protection Act". This promise to our members and customers outlines the principles that we operate by with regard to the collection, use and disclosure of your personal information.

We want you to understand how and under what circumstances your personal information is collected and used, as well as what we're doing to ensure that your information is used according to good business practices and protected accordingly. We are careful to ensure that information is used responsibly, and only for the purposes for which you gave it to us.

What is personal information?

As a co-operative there are a number of types of personal information that exist about you that we may collect directly or obtain from our business partners. This information could be collected in person, over the telephone, through the mail, or over the internet.

The information we may collect or obtain includes but is not limited to:

- Your identity or contact information such as your name, address, phone number, fax number, and e-mail address;
- Your date of birth and social insurance number if you are a member of UFA;
- Your transaction history with us for any or all products or services you may have obtained from us. This could include billings, products and services purchased, and payment information;
- Your credit or financial history with us;
- Your communications with us such as customer service inquiries, information requested or provided to you, or responses to surveys or contests.

Why do we collect and use your personal information?

Being a retail co-operative we require basic information about you in order 1) for you to become a member and realize the benefits of membership and 2) to conduct business and provide value added services to you. We recognize that some of this information is sensitive or private, which is why we collect personal information only for the following purposes:

1. **To administer our member equity and member loan programs.**
   We require certain information from our members in order to administer and fulfill our obligation to our members under UFA's member equity program (including the member loan program).

For example, to administer our equity program in accordance with UFA by-laws we request information such as your date of birth. We require your date of birth to ensure that your equity is converted into dividend earning Investment Shares at age sixty-five.

As another example, to ensure we comply with tax legislation we are required to ask for your social insurance number.

2. **To calculate and pay patronage dividends on purchases.**
   To be able to calculate and pay out member's annual patronage dividend we record purchases by individual member.

3. **To participate in the democratic process**
   We track member purchases to identify members who are eligible, under our by-laws, to participate in UFA's election process.

4. **To create, maintain and enhance a responsible business relationship with you and provide ongoing service.**
   When you apply for a line of credit from UFA, we collect information that allows us to verify your identity and credit history so that we can accurately bill and collect for the products and services that you receive from us. For example, we will collect and use personal information in order to activate or de-activate your account, maintain account information, bill you and process your payment. We also use this information to protect you and us from error or fraud, respond to inquiries, or communicate with you about account activity or adjustments.

5. **To maintain our business and operations on your behalf.**
   In order to develop and offer products and services that our members and customers are interested in, we analyze our purchase records, including buying patterns, payment options used, and so on. We may, from time to time, ask you to participate in surveys (which you have no obligation to participate in), that allow us to determine products or services that are of interest to you.

6. **To meet legal and regulatory requirements.**
   Collecting and using personal information is required for us to meet our contractual obligations to you, or our legal and regulatory obligations to others.

How do we protect your personal information?

UFA values your right to privacy and works hard to protect your personal information.

UFA:

1. will not collect, use or disclose your personal information for any purpose other than those identified above, except with your consent or otherwise as permitted or required by law;

2. will make all reasonable efforts to protect the confidentiality of your personal information;

3. will protect your personal information with appropriate and effective internal controls and safeguards;

4. will strive to keep your personal information as accurate and up-to-date as is necessary for the purposes identified above; and

5. will honour any request you may make for access to your personal information, subject to exceptions permitted by law, and correct any information which is inaccurate or incomplete.

When do we share your personal information?

It is UFA's policy NOT to sell its customer or member database to any third party.

There are, however, some circumstances where we may share personal information about our customers internally or with a business partner. For example:

1. Subject to applicable regulations, your personal information may be shared among UFA business units or business partners. Under certain limited circumstances UFA requires assistance from different parts of our organization or our business partners to ensure our customers and members are provided with a product service offering which meets their needs. Because part of our retail organization is managed in the United States (i.e. Wholesale Sports), some personal information about you may be transferred, processed, managed or stored in the United States and may therefore be subject to the laws of that country. You may contact UFA's Privacy Officer for further information about our practice in this regard, at privacy.officer@ufa.com.

2. Your personal information may be disclosed to:

   a. A company or individual employed by UFA to perform functions on our behalf such as market research, target marketing or data processing or

   b. A company used by UFA to evaluate on our behalf the customer's credit worthiness or to collect the customer's past-due account.

3. Subject to applicable regulations, we may disclose your personal information to a credit reporting agency, government agency, court, or law enforcement personnel.

4. We may share personal information about you to a person who, in our reasonable judgement is seeking the information legitimately on your behalf. For example, we may provide information about a customer's account to the customer's legal representative if we are satisfied that individual is requesting the information on behalf of the customer.

5. We may disclose a customer's personal information to a public authority or agent of a public authority, if in our reasonable judgement, it appears that there is imminent danger to life or property, which could be avoided or minimized by disclosure of the information.

   Any such disclosure of your personal information is made on a strictly confidential basis, and the information is to be used only for the purpose for which it was shared. UFA ensures that the company or individual adheres to our Privacy Policy.

What choices do you have?

At UFA, we believe strongly in the power of choice. We are working hard to ensure we have and maintain

your confidence and consent to collect, use and disclose your personal information for the purposes identified above. However, you do have a choice and can refuse or withdraw your consent at any time as follows:

1. You may have your contact information removed from our marketing lists, which we use to inform you of new or relevant products, services and special offers that we believe will add value to you or your business.
2. You may refuse to provide personal information to us. You may also withdraw your consent at any time, subject to applicable legal or contractual restrictions and reasonable notice. However, in either case, this may severely limit our ability to provide goods and services to you (e.g. inability to provide to you a line of credit if you withdraw your consent to our on-going collection, use or disclosure of credit information).

Unless you contact us to inform us otherwise, by receiving this Privacy Commitment, you are deemed to have given your consent to collect, use and disclose your personal information for the purposes identified above. If you 1) have any questions about our privacy practices, 2) wish to access your personal information or 3) wish to have your name removed from our marketing lists or withdraw your consent to the use and disclosure of your personal information, please call us at our Customer Support Line at 1-866-333-3832 or e-mail us at privacy.officer@ufa.com. You can also find a copy of the UFA Personal Information Commitment online at www.ufa.net

NOTES:

The UFA Privacy Commitment and the privacy legislation refer only to an individuals personal information and do not apply to information regarding business customers. However, such information is protected by other UFA policies and practices and through contractual arrangements.

The UFA Privacy Commitment and the practices and principles described in this document are subject to the provisions of all applicable legislation and regulations.

1. *In the document, the words "we" or "UFA" refer to UFA and its subsidiary companies as they may exist from time to time.*
2. *The UFA Privacy Policy does not limit the collection, use or disclosure by UFA of an employee's name, title, business address (including e-mail address) or business telephone or fax number, or other information about the employee that is publicly available and is specified by regulation pursuant to the Personal Information Protection and Electronic Documents Act.*

This document is subject to the provisions of the UFA privacy policy and is not intended to replace the policy or create new rights or obligations not contained in the policy. The UFA privacy policy and the privacy practices described in this document are subject to the provisions of all applicable legislation and regulations.