

Category:

Management Philosophy

Policy No: 1.08

Effective Date:

January 1, 2004

Amendment Date:

November 30, 2007

SUBJECT:

**PERSONAL INFORMATION AND PROTECTION AND
ELECTRONIC DOCUMENTS ACT (PIPEDA)**

POLICY:

Rogers Foods Ltd. is committed to maintaining and protecting the accuracy, confidentiality and security of personal information of its employees and individuals with whom it conducts business. Rogers will protect the privacy of personal information of employees, of applicants for employment and individuals, as well as personal information received by the Company from other sources at all times during and after employment with the Company.

Personal Information

Personal information is information about an identifiable individual. Personal information may include, but is not limited to, social insurance number, gender, salary, family/dependent information, home address, date of birth, employment files, benefit forms, assessments or evaluations and any other information that identifies individuals or would allow someone to contact an individual.

An individual's name does not need to be attached to the information in order for it to qualify as personal information. Personal information does not include name, title, business address, or phone number of an employee or an organization.

TEN PRIVACY PRINCIPLES

As part of its commitment to privacy, Rogers has adopted the following ten principles based on Canada's privacy legislation, the Personal Information Protection and Electronic Documents Act (PIPEDA). This Privacy Policy describes how Rogers collects, uses and discloses personal information concerning its employees.

Principle 1 – ACCOUNTABILITY

Rogers is responsible for protecting personal information under its control and has designated individuals who are responsible for ensuring the Company's compliance with these privacy principles.

Privacy Officer:

The Company has designated the Human Resources Manager as the Privacy Officer and any questions or complaints with regards to privacy issues should be directed to the Human Resources Department.

Management:

Senior managers, managers and supervisors are responsible for and shall oversee compliance by their staff with Rogers' Privacy Policy to ensure:

- Purposes are defined for collection of personal information
- Consent is obtained to collect and disclose the information
- Collection, use and disclosure of personal information is limited
- Information is accurate, complete and up-to-date

- Adequate safeguards protect personal information within Rogers' control
- Retention and destruction timetables are maintained
- Contracts with third parties that process Rogers information shall include privacy protection requirements

Managers and supervisors are responsible for the collection, processing and safeguarding of personal information under their control. Managers and supervisors shall inform and train employees having access to personal information on Rogers' privacy policies and procedures.

All employees of Rogers are bound under this Privacy Policy to maintain and protect the privacy and confidentiality of personal information and to follow the privacy protection procedures established by Rogers when collecting, using, disclosing and safeguarding personal information.

All Rogers' third party providers are bound contractually to maintain the confidentiality of personal information and to not use the personal information for purposes that are not related to service/product that they have been contracted to provide and that is not consistent with Rogers' privacy policies and practices.

Principle 2 – IDENTIFYING PURPOSES

The purposes for which personal information is collected will be identified before or at the time the personal information is collected.

Rogers collects, uses and discloses personal information for the purposes of establishing, managing and promoting the employment relationship with its employees, (current, retired or terminated) or with prospective job applicants, and with other individuals.

The purposes are as follows:

- To establish and maintain employment relationships with employees, prospective job applicants and other interested individuals
- To administer compensation, incentive programs, benefits, pension plans, and health and safety programs
- To meet legal, statutory and other regulatory requirements
- To manage employees in terms of staffing, recruitment and succession planning decisions. This includes managing employee development, performance management evaluations, and enhancing our ability to meet business objectives
- To administer and/or protect the Company assets such as communication, networks, voicemail and the Internet

Rogers will indicate orally, electronically or in writing, at or before the time personal information is collected, the purpose for which it is being collected.

Principle 3 – CONSENT

The knowledge and consent of the individual will be obtained for the collection, use, or disclosure of personal information, except in certain circumstances required or permitted by law.

It is Rogers' policy to collect, use and disclose personal information about its employees and other individuals with their knowledge and consent, unless required or allowed by law. Prior

to collecting personal information, the Company will identify the purposes for doing so and limit the collection, use and disclosure of personal information to those purposes.

Consent may be obtained in various ways. Rogers may obtain express consent or may determine that consent has been implied by the circumstances.

By completing application forms, benefit or pension forms or employment related contracts, employees and individuals are consenting to the collection and use of personal information for the purposes set out in this Privacy Policy and to the disclosure of personal information to the persons identified in this Privacy Policy for the purposes noted in the above section.

In certain circumstances, depending upon the personal information required, express consent will be obtained and employees will be advised prior to the collection, use and disclosure of personal information.

Employees and individuals may withhold or withdraw their consent for Rogers and designated third parties as long as there are no legal or contractual reasons preventing them from doing so. Depending upon the circumstances, however, withdrawal of consent may affect the ability of Rogers to continue to provide employment, compensation, benefits and programs to employees, or products or services to individuals. Employees and individuals may contact Rogers for more information regarding the implications of withdrawing consent.

Generally, the disclosure of employee and individual personal information will be restricted to those who have a need for, and the right to, the information. Personal information will be accessible by Rogers' employees who need the information in the performance of their duties. Such employees will include, but not be limited to, payroll/benefit administrators, supervisors, managers and human resources staff.

Exceptions: Rogers may collect, use or disclose information without an individual's prior knowledge or consent in certain circumstances as permitted by law or when required by a court of law or by a regulatory organization, or to legal advisors in order to protect the interests of Rogers, or in an emergency situation where the life, health or security of an individual is threatened.

Rogers may disclose personal information without prior knowledge or consent of the individual in the following situations:

- To a lawyer or other legal representative of Rogers
- To a government body or agency in certain circumstances (for example: Canada Revenue Agency, Employment Insurance, provincial employment standards)
- To collect a debt, or comply with a subpoena, warrant or other court order, or as required by a court of law
- In circumstances otherwise permitted by law

Principle 4 – LIMITING COLLECTION

The collection of personal information shall be limited to that which is necessary for the purposes identified and will be collected by fair and lawful means.

When collecting personal information, Rogers will usually collect it directly from the individuals about whom the personal information pertains in the form of completed

applications or forms, or through other means of correspondence such as the telephone, mail or email.

Personal information may be collected from other sources with prior consent from the individual, for example, from prior employers, personal references or from other third parties having the right to disclose the information.

Principle 5 – LIMITING USE, DISCLOSURE AND RETENTION

Personal information shall only be used or disclosed for the purposes for which it was collected, unless the individual has otherwise consented or when required or permitted by the law. Personal information will be retained for as long as necessary to satisfy the purposes for which it was collected, or as required or permitted by law.

Personal information will be retained in the Company records for as long as it is reasonably needed to fulfill the identified purposes, or as required or permitted by law. Personal information will be destroyed in a safe and secure manner once it is no longer required.

Rogers discloses employee personal information to third parties as required to process payroll and compensation, benefits and pension, to employees and agents and other related employment services, or as required by applicable law, or as otherwise set out in this policy.

Principle 6 – ACCURACY

Any personal information that is collected, used or disclosed will be kept as accurate, complete and as up-to-date as is necessary for the purposes for which it is used.

Rogers will make every reasonable effort to ensure that any personal information is accurate, complete and as up-to-date as required for the identified purposes. Rogers will rely on employees and individuals to provide accurate information and to advise the Company of any changes.

Employees and individuals aware of any inaccuracy or changes in their personal information are to contact the Human resources Department, depending on the nature of the information.

Principle 7 – SAFEGUARDS

Personal information shall be protected by security safeguards appropriate to the sensitivity level of the information received.

Rogers is committed to protecting the personal information of its employees, (including prospective, current, retired, or terminated) and individuals, and has implemented the necessary security safeguards that are appropriate to the sensitivity of the information to protect it from unauthorized access, disclosure, use or copying.

This means that the personal information is protected:

- Physically by building security measures, secure locked file cabinets
- Organizationally by Rogers policies, procedures, staff training and limited access levels
- Technologically by appropriate use of electronic means, including passwords, anti-virus software, use of firewalls

All employees, agents or third party service providers are required to follow the Privacy Policy and practices to protect and safeguard personal information and may not use the information for any unauthorized purpose.

If Rogers receives a request to release personal information, the Company will do so only upon satisfactory identification and proof of entitlement of the organization or individual making the request or as required or permitted by law, or upon written authorization of employees, past or present.

Principle 8 – OPENNESS

Rogers will provide information to individuals about its privacy policies and practices relating to the management of personal information.

Employees and other individuals can obtain more information about Rogers' privacy policies and procedures by contacting the Privacy Officer in writing. The Privacy Policy is available in the Rogers' Policies and Procedures manual and on the Company web site.

Principle 9 – INDIVIDUAL ACCESS

Upon written request to Rogers' Privacy Officer, an individual will be informed of the existence, use and disclosure of their personal information and shall be given access to it as required and permitted by law. Individuals are entitled to challenge the accuracy and completeness of that personal information and request to have it amended as appropriate.

Employees and individuals have the right to access and verify personal information maintained in the Company files and to request that any factually inaccurate personal information be corrected, subject to exemptions in the applicable legislation. Depending upon the circumstances, Rogers may not always be able to give access to all information, and if this is the case, Rogers will provide the individual with reasons in writing for denying access.

Rogers shall provide individuals a reasonable opportunity to review and challenge the accuracy and completeness of personal information. A statement of disagreement will be attached to records where a requested amendment cannot be made.

Employees can request access to their employee file by contacting the Human Resources Department.

Principle 10 – CHALLENGING COMPLIANCE

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individuals accountable for Rogers' compliance.

It is Rogers' policy to respond to all inquiries, requests for access to personal information and concerns within 30 days or receiving them unless otherwise allowed or required by law. Inquiries are to be in writing and directed to the attention of the Privacy Officer. If the Privacy Officer is unable to respond to the inquiry within 30 days, individuals will be notified in advance of the end of the 30 day period of when to expect to receive a response.

Note: All inquiries and complaints must be in writing to the attention of the Privacy Officer. Telephone calls will not be accepted. Please be sure to include your name, address, and phone number and information relating to the nature of your inquiry or complaint.