

Know your Privacy Rights!

A resource for farmers and farm workers to
understand their rights under PIPEDA

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Introduction

Data are essential to farming. Farm data get collected by sensors in “precision” farm machinery, but also by cameras used in greenhouses, as just two examples. When an individual or an individual farm’s data are put together with others, these aggregate datasets can be “mines” by artificial intelligence and used to generate insights. While there are benefits to farmers who buy the data-driven insights, there are also potential privacy harms to farmers and other food system workers (e.g., greenhouse employees) arising from the collection and use of their personal data. Most internet users are aware of the vulnerability of their personal data to outside attack or corporate abuse by hackers or companies like Facebook, Amazon and Google. But less is known about harms that might arise from data collected from farm machinery and what to do to prevent these harms. This resource aims to shed light on farmer and farmworker rights around their personal data.

What is “PIPEDA”?

In Canada, the **Personal Information Protection and Electronic Documents Act** (S.C. 2000, c. 5) or **PIPEDA** is the current federal law that governs how private companies collect, use, and disclose **personal information**. PIPEDA also outlines individuals’ privacy and data rights and how to file an official complaint.

The **Office of the Privacy Commissioner of Canada** (OPC) oversees compliance and complaints associated with PIPEDA and the *Privacy Act* (R.S.C., 1985, c. P-21), which outlines how federal departments and agencies handle personal information.

According to PIPEDA, “**personal information means information about an identifiable individual.**” This includes things like your age and ethnicity, as well as information about your health and finances.

PIPEDA includes 10 principles¹ for fair and moral treatment of personal information:

- | | |
|---|-----------------------------------|
| 1. Accountability | 6. Accuracy |
| 2. Identifying purposes | 7. Safeguards |
| 3. Consent | 8. Openness |
| 4. Limiting collection | 9. Individual access |
| 5. Limiting use, disclosure, and retention | 10. Challenging compliance |

For each principle, we have examples and illustrations of farmer and farmworker experiences to clarify your rights, how to spot a breach, and what to do about it.

What does this mean for people working in agriculture?

There are many resources available for [individuals](#) and [businesses](#) on the website of the Office of the Privacy Commissioner of Canada. However, during our engagement and research with farmers and farm workers in Canada, we learned that the legal requirements and steps to take in response to a breach were unclear to many people working in agriculture. We developed this resource specifically for farmers and farm workers in Canada.

¹ See Schedule 1, Section 5: “Principles Set Out in the National Standard of Canada Entitled Model Code for the Protection of Personal Information, CAN/CSA-Q830-96” and on the OPC website: https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/p_principle/

Acknowledgements

We acknowledge that the University of Ottawa is located on the traditional and unceded territory of the Omamiwinini Anishnàbeg (Algonquin) Nation.

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AI use disclaimer

We *did not* use AI to generate the examples or writing for this resource. The illustrations of privacy and data scenarios were produced using DALL-E (Generative AI). We crafted iterative prompts for the image generation.

We acknowledge that AI-generated illustrations are only possible because of the inclusion of existing human-generated art in training models. It is possible that the images in our resource resemble the work of artists or other AI-generated content. With more funding, we would have preferred to hire an artist to depict the scenarios.

Legal disclaimer

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Review the full Act here: <https://laws-lois.justice.gc.ca/eng/acts/p-8.6/index.html>.

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Accountability (PIPEDA Principle #1)

According to PIPEDA Principle #1, if a private company collects your personal information, **there must be an individual or organization accountable for handling your personal information in compliance with PIPEDA.**

How to Spot a Violation of Your Rights 🔍

- You do not know who to contact about your privacy concerns or questions.
- There is no clear policy outlining who is accountable for data handling.
- No one responds when you ask how your data is protected or used.
- The organization avoids answering questions about their privacy practices or who is in charge.

Examples on the Farm

Farm Managers & Farmers	Farm Workers
	
Your company failed to assign a privacy officer, leaving you confused about how your data is handled.	There is no information in your employee paperwork on how your personal information is managed.

What to Do About It 💬

1. **Ask for Clarification:** Find out who is accountable for protecting your data.
2. **Report Concerns:** If no privacy officer is assigned, submit a written request asking for clarification and corrective action.
3. **Document all Communication:** Keep a record of your requests and the organization's responses.
4. **File a Complaint:** If unresolved, file a complaint with the Office of the Privacy Commissioner of Canada.

Identifying Purposes (PIPEDA Principle #2)

According to PIPEDA Principle #2, you have the right to know exactly why an organization is collecting your personal information before or at the time of collection. **The purpose must be clearly defined, documented, and communicated to you at the time of collection.**

How to Spot a Violation of Your Rights 🔍

- The organization does not clearly explain why your data is being collected.
- You find out your data was used for something different than what you were told.
- The privacy policy is vague or missing purpose details.
- You were asked for consent after data collection or without full explanation.

Examples on the Farm

Farm Managers & Farmers	Farm Workers
	
A seed supplier collects your land information but does not explain why leaving you uncertain about how your data will be used.	A farm manager collects biometric fingerprints from farm workers but does not explain what and how that data will be used.

What to Do About It 💬

1. **Review Privacy Policy:** Look for clear statements about what data is collected and why.
2. **Report Concerns:** Contact the organization directly and request an explanation of the purpose behind data collection.
3. **Document all Communication:** Keep a record of your requests and the organization's responses.
4. **File a Complaint:** If unresolved, file a complaint with the Office of the Privacy Commissioner of Canada.

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Consent (PIPEDA Principle #3)

According to PIPEDA Principle #3, you have the right to understand what you are agreeing to. **No one can use, share, or collect your data without your clear permission and you can withdraw consent at will.**

How to Spot a Violation of Your Rights 🔍

- You were not told your data would be shared.
- Your data is being used for reasons that were not explained.
- You do not remember giving permission.
- You are asked to sign vague or unclear forms.
- You feel pressured to say yes or were not given a real choice.

Examples on the Farm

Farm Managers & Farmers	Farm Workers
	
You agreed to share soil data with a tool provider to improve productivity, but now it is shared with a third-party fertilizer company.	You gave your personal information for payroll, but your supervisor shared it with a security company without consent.

What to Do About It 💬

1. **Review Agreements:** Verify whether your consent was obtained.
2. **Document Concerns:** Note what information was collected, who requested it, any signed forms, and details of the breach.
3. **Report Concerns:** Raise your concern in writing to HR, a supervisor, or a manager.
4. **Document all Communication:** Keep a record of your requests and the organization's responses.
5. **File a Complaint:** If unresolved, file a complaint with the Office of the Privacy Commissioner of Canada.

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Limiting Collection (PIPEDA Principle #4)

According to PIPEDA Principle #4, You have the right to expect that only the minimum necessary personal information is collected for a specific and clearly stated purpose. **Organizations must not collect excessive or unrelated data beyond what is needed to deliver the service.**

How to Spot a Violation of Your Rights 🔍

- You are asked for sensitive personal data that seems unrelated to the service.
- Apps or services request more data than seems reasonable.
- The data being collected includes third-party contacts such as family members' information.

Examples on the Farm

Farm Managers & Farmers	Farm Workers
	
A farm accounting software asks you for full banking histories and credit scores, even though it only needs monthly expense totals.	A farm requires drivers to upload medical test results and full health histories, despite no direct contact with food.

What to Do About It 🗨️

1. **Find Privacy Contact:** Ask who is responsible for data collection questions.
2. **Document Concerns:** Note what was collected, who requested it, and how it was explained.
3. **Report Concerns:** Submit a clear, written concern and allow 30 days for a response.
4. **Document all Communication:** Keep a record of your requests and the organization's responses.
5. **File a Complaint:** If unresolved, file a complaint with the Office of the Privacy Commissioner of Canada.

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Limiting Use, Disclosure, and Retention (PIPEDA Principle #5)

According to PIPEDA Principle #5, you have the right to expect that your personal information is only used for the specific reason it was collected and nothing more. **It should not be kept longer than necessary and must never be shared with others without your consent.**

How to Spot a Violation of Your Rights 🔍

- Your data is kept even after your relationship with the company ends.
- Information you provided for one purpose is later used for something else.
- The company refuses or fails to explain how long your data will be retained.
- Archived data is shared or sold without your knowledge.
- There is no clear privacy policy or retention schedule available.

Examples on the Farm

Farm Managers & Farmers	Farm Workers
	
You install sensors for maintenance, but your vendor shares the data with suppliers to influence pricing without informing you.	A farm employer collected health information to ensure fitness for work but later uses it to decide who gets extra shifts.

What to Do About It 💬

1. **Review Retention Policy:** Check for clear timelines on how long your data is kept and why.
2. **Report Concerns:** Contact the organization and ask if your data will be used for any purpose beyond what was first explained.
3. **Document all Communication:** Keep records of what you were told the data would be used for, and note any new or unexpected uses later on.
4. **File a Complaint:** If unresolved, file a complaint with the Office of the Privacy Commissioner of Canada.

Accuracy (PIPEDA Principle #6)

According to PIPEDA Principle #6, you have the right to expect that any personal information collected from you is **accurate, complete, and up to date**.

How to Spot a Violation of Your Rights 🔍

- You notice mistakes in your personal data.
- You were not asked to confirm or update your information.
- You experience consequences such as missed payments, unsafe recommendations, or incorrect decisions.
- The organization continues using outdated data that impacts your work or access to services.

Examples on the Farm

Farm Managers & Farmers	Farm Workers
	
A third-party tool used outdated soil data to make recommendations, resulting in poor crop yields and avoidable losses.	A food processing company uses outdated records to assign shifts causing some workers to be overworked while others to miss hours.

What to Do About It 🗨️

1. **Ask Questions:** When sharing your information, ask how it will be kept accurate and whether you can update it in the future.
2. **Request Review:** Contact the organization to ask to correct or update your personal data.
3. **Be Specific:** Clearly state what is incorrect, the correct information, and why it matters.
4. **Report Concerns:** If incorrect information was shared with others, request that they be notified of the correction.
5. **Document all Communication:** Keep a record of your requests and the organization's responses.
6. **File a Complaint:** If unresolved, file a complaint with the Office of the Privacy Commissioner of Canada.

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Safeguards (PIPEDA Principle #7)

According to PIPEDA Principle #7, you have the right to have your personal information protected by appropriate security safeguards based on how sensitive the information is. **This means data must be stored securely and shielded from unauthorized access, theft, or leaks.**

How to Spot a Violation of Your Rights 🔍

- A system does not ask for a password, or your login is shared with others.
- You notice sensitive files stored in open or shared folders.
- The organization has not explained how your data is protected or stored. There has been a breach or hack but you were never informed.
- You are asked for sensitive data but not told who will see it or how it will be protected.

Examples on the Farm

Farm Managers & Farmers	Farm Workers
	
Pesticide use data are accessed through an unsecured computer, making sensitive data public without farmer consent.	Workers' payroll accounts are protected by simple passwords that can be easily guessed.

What to Do About It 🗨️

1. **Check Privacy and Security Policy:** Look for details on how your data is stored, who has access, and what happens if there is a breach.
2. **Document Concerns:** Save evidence of weak protections (e.g., shared logins, exposed info).
3. **Report Concerns:** Contact the organization to clarify what security measures protect your data.
4. **Document all Communication:** Keep a record of your requests and the organization's responses.
5. **File a Complaint:** If unresolved, file a complaint with the Office of the Privacy Commissioner of Canada.

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Openness (PIPEDA Principle #8)

According to PIPEDA Principle #8, you have the right to easily find and understand how your personal information is being collected, used, and shared. **Privacy policies must be clear and understandable.**

How to Spot a Violation of Your Rights 🔍

- The privacy policy is missing, buried, or hard to understand. You are given vague or dismissive explanations without further details.
- You are not told who your data is shared with.
- You cannot find a clear explanation of what data is collected or why.

Examples on the Farm

Farm Managers & Farmers	Farm Workers
	
You are trying to understand how your data is used by a company, but the privacy policy is hard to find and written in confusing language.	A worker asks her manager how her data is being used. She's told "it's just for company use" with no written policy or clear explanation.

What to Do About It 💬

1. **Request Privacy Policy:** Ask for the company's privacy policy and contact information of the person responsible for privacy.
2. **Report Concerns:** Contact the organization directly with privacy concerns.
3. **Document all Communication:** Keep a record of your requests and the organization's responses.
4. **File a Complaint:** If unresolved, file a complaint with the Office of the Privacy Commissioner of Canada.

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Individual Access (PIPEDA Principle #9)

According to PIPEDA Principle #9, you have the right to see the personal information collected about you. **You can ask to access it, understand how it is used, and correct anything that is wrong.**

How to Spot a Violation of Your Rights 🔍

- You are denied access to your own data.
- You are asked to pay high fees to see your data.
- You do not get a response to your request.
- You cannot see or correct wrong information.
- Your employer or provider says you have “no right” to access it.

Examples on the Farm

Farm Managers & Farmers	Farm Workers
	
You request access to your personal information, but the technology provider demands a \$1500 fee to access your own information.	Your fingerprint was scanned for work access, but when you asked to see your biometric data, your employer said you had no right.

What to Do About It 💬

1. **Request Access:** Clearly request to access your personal data.
2. **Report Concerns:** Contact the organization with access concerns or to fix data accuracy.
3. **Document all Communication:** Keep a record of your requests and the organization’s responses.
4. **File a Complaint:** If unresolved, file a complaint with the Office of the Privacy Commissioner of Canada.

Challenging Compliance (PIPEDA Principle #10)

According to PIPEDA Principle #10, you have the right to challenge how an organization handles your personal data. **Businesses must provide a clear process to raise concerns and respond to privacy complaints in a timely and respectful manner.**

How to Spot a Violation of Your Rights 🔍

- There is no clear way to file a complaint about how your data is used.
- Complaints are ignored, dismissed, or punished.
- No contact person or privacy officer is listed.
- You are discouraged from questioning data practices.

Examples on the Farm

Farm Managers & Farmers	Farm Workers
	
You raise concerns about misused personal data but only receive automated responses, with no action taken.	You try to report a data privacy concern but find no clear contact, complaint process, or follow-up support.

What to Do About It 🗨️

1. **Find Privacy Contact:** Ask for the company's privacy policy and contact information of the person responsible for privacy.
2. **Report Concerns:** Start with an internal written complaint and allow up to 30 days for a response.
3. **Document all Communication:** Keep a record of your requests and the organization's responses.
4. **File a Complaint:** If unresolved, file a complaint with the Office of the Privacy Commissioner of Canada.

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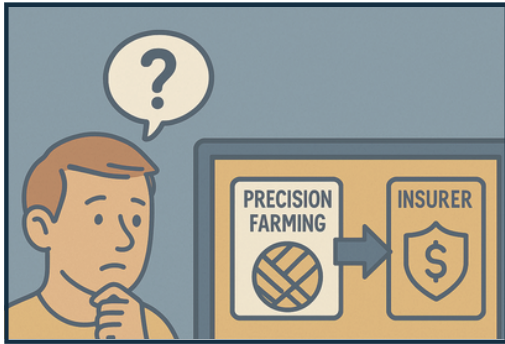
Additional Examples

Accountability (PIPEDA Principle #1)

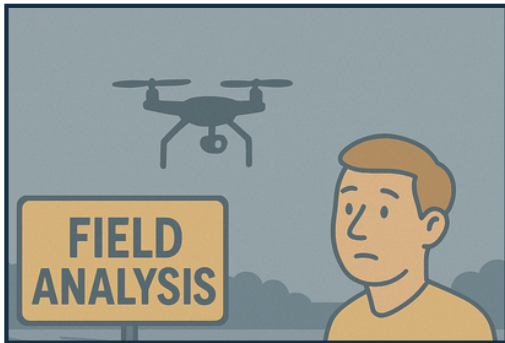
Farm Managers & Farmers	Farm Workers
	
A farm manager is unable to find any option to file a privacy complaint or contact support about how their data is handled.	Supervisors store employee disciplinary notes and medical leave forms in an open filing cabinet. Workers can easily browse through confidential HR files.
	
A farm owner reports that her SIN and bank details were shared without permission. The payroll company ignores the complaint because no one is clearly responsible.	Payroll records with employee names and SIN numbers are openly posted, allowing any worker to view confidential information.
	
A driver casually shares screenshots of farm managers' addresses and phone numbers from their personal device due to lack of internal policies.	The farm hires a payroll company but does not check if the company keeps workers' personal information safe.

Identifying Purposes (PIPEDA Principle #2)

Farm Managers & Farmers



A precision farming tool collects crop data for advice but quietly shares it with insurers to assess risk.



A drone service collects field imagery from your land but uses it to train AI models for other commercial clients without prior disclosure.



A delivery platform asks for language preference, then uses it to target farm managers with culturally specific ads.

Farm Workers



A company collects "anonymous" feedback from customers, then traces it back to penalize workers without telling them.



The farm collects allergy data to personalize menus but later uses it for ads without telling workers.



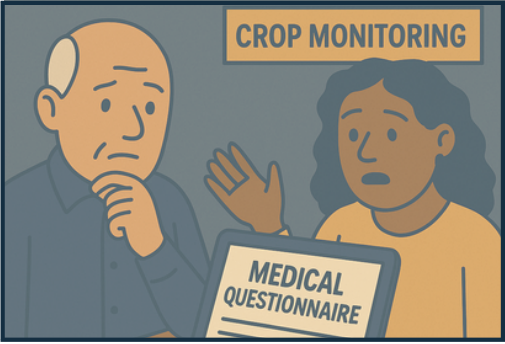
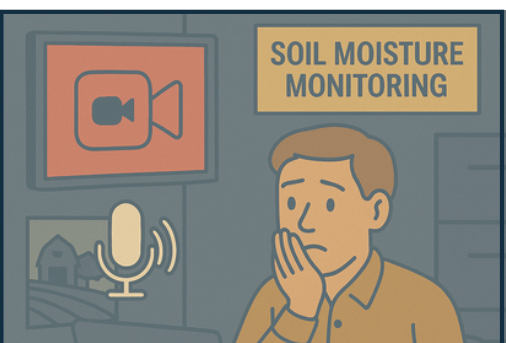
Farm workers are asked to submit copies of their passports, but the company never explains why they need them.

Consent (PIPEDA Principle #3)

Farm Managers & Farmers	Farm Workers
	
A farm installs cameras in worker housing without asking or informing them.	Consent for sharing personal information is buried in long, complicated forms that workers cannot understand.
	
You are automatically added to a marketing program without being given a way to opt out.	Workers are told they must sign a form giving access to their medical history or they will lose their job.
	
A smart irrigation device measures how wet the soil is. It then sends that data to a fertilizer company, but the farmers never agreed to share it.	You discover your biometric data, originally collected for secure access, is now being used to monitor your productivity without your approval.

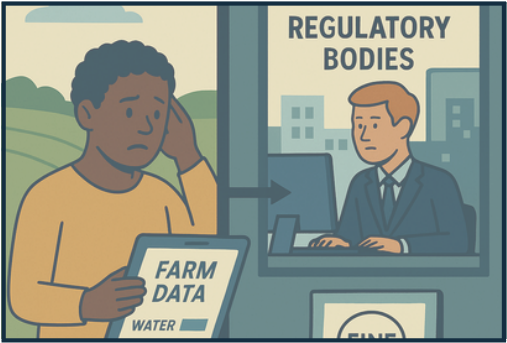
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Limiting Collection (PIPEDA Principle #4)

Farm Managers & Farmers	Farm Workers
	
A farm technology provider requires you to complete medical questionnaires to access crop monitoring tools, despite no health-related features.	Workers are told to give their Facebook or Twitter usernames even though it has nothing to do with their job.
	
An online food subscription company asks farm owners to disclose political affiliations during onboarding to “understand workplace values.”	Workers are asked to give full medical histories when only proof of fitness for work is necessary.
	
A digital farm marketplace asks you to share your union memberships when signing up to sell produce.	Farm owners track workers’ personal phones 24/7, even when workers are off duty.

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Limiting Use, Disclosure, and Retention (PIPEDA Principle #5)

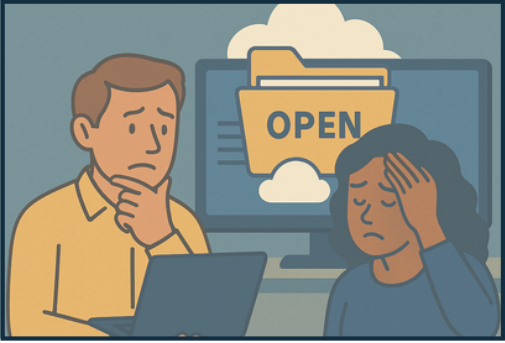
Farm Managers & Farmers	Farm Workers
	
A farming system collects pesticide and water usage data to support internal goals but shares it with regulators without consent, resulting in fines.	After workers leave, their personal information (IDs, bank details, medical forms) is stored for years instead of being securely destroyed.
	
Archived financial data is shared without your consent, leading to unsolicited credit offers and assumptions about your risk profile.	Private messages in a work app are later used to punish food workers, even though they were told the chat was just for scheduling.
	
A food delivery company stores a farm's past order choices indefinitely and uses them for AI training.	Food workers fill a food safety quiz for onboarding training. The company later uses answers to decide promotions.

Accuracy (PIPEDA Principle #6)

Farm Managers & Farmers	Farm Workers
	
A supplier relies on outdated information which causes the farm's address to be incorrect and the order to be late.	The farm relies on outdated nutrition information, causing workers to have meals that are not suitable for their health.
	
An agricultural platform fails to update a farmer's pesticide sensitivity profile, leading to harmful product suggestions.	Payroll records list an incorrect bank account of a farm worker, delaying their salary.
	
You get billed to the wrong card because your supplier never updated the new payment info you gave them.	You cannot locate where to review, update, or correct your data in your profile on the company portal.

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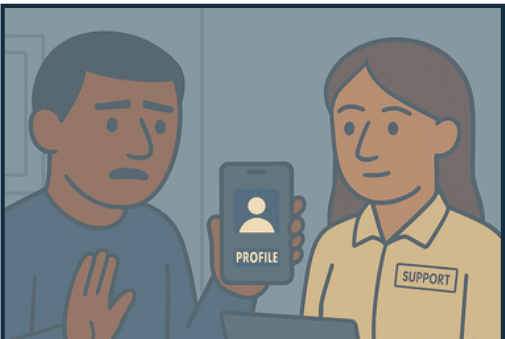
Safeguards (PIPEDA Principle #7)

Farm Managers & Farmers	Farm Workers
	
A third-party drone records workers in break areas and the footage is uploaded to a public folder.	A former employee misuses weak login security to access private staff data from a company scheduling app.
	
A supplier's unencrypted laptop with sensitive farm records is stolen, exposing confidential data due to weak device safeguards.	A farm delivery app transmits workers' location data over unsecured Wi-Fi, exposing their routines and identities.
	
All employee payroll accounts are protected by simple passwords that can be easily guessed.	A company's surveillance system is hacked due to weak security settings, exposing private footage of staff without their knowledge or consent.

Openness (PIPEDA Principle #8)

Farm Managers & Farmers	Farm Workers
	
The organization did not make it easy to find out that your information would be shared with third-party partners.	You use a dietary app that collects sensitive health data but there is no privacy policy to tell you how your information is used or protected.
	
Changes to data collection or sharing practices are made, but farmers/workers aren't informed.	You struggle to understand your company's privacy policy because it is filled with complex legal jargon.
	
A farm data platform buries its privacy policy in a 40-page terms of service, leaving you confused about what data is collected and shared.	An agricultural company collects your personal data but offers no privacy officer, contact, or complaint process, leaving you with nowhere to turn.

Individual Access (PIPEDA Principle #9)

Farm Managers & Farmers	Farm Workers
	
You ask a company to fix incorrect data about you, but they ignore your correction request.	A worker notices their hours are wrong but is told “we cannot change it.”
	
You are denied access to your own agricultural data, with no explanation or support.	You are not allowed to view your data profile even though it is used to decide your pricing or creditworthiness.
	
To update personal info, you must send multiple emails and forms with no guidance.	You cannot view or challenge the data used to generate a risk score for you.

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Challenging Compliance (PIPEDA Principle #10)

Farm Managers & Farmers	Farm Workers
	
You report undisclosed drone surveillance which leads you to be removed from a platform's pilot program in retaliation.	You face retaliation after raising a privacy concern, with your shifts suddenly reduced following your complaint.
	
You seek answers about how your livestock tracking data is handled but find no designated privacy contact to address your concerns.	Workers don't know who to talk to if they think the farm is mishandling their personal info.
	
You struggle to understand how to challenge a complex and hidden data retention policy buried in legal terms.	A user navigates an app in frustration, unable to find any option to file a privacy complaint or contact support about how their data is handled.

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