

# WALLACE CONSTRUCTION SPECIALTIES LTD.

## PRIVACY POLICY

Wallace Construction Specialties Ltd. (in this privacy policy referred to as “Wallace”, “we”, “our” or “us”) is committed to protecting the privacy of your personal information that is collected, used, and disclosed in the course of our business from customers. This privacy policy has been prepared to inform you of our practices concerning the collection, use and disclosure of your personal information provided to us.

### **Collection of Personal Information**

Under Canadian privacy legislation, personal information is defined broadly as information about an identifiable individual (in this privacy policy referred to as “you” or “your”) and would include information such as your name, address, and your product and service purchases from our business.

However, personal information does not include what is generally referred to as business contact information which consists of the name, title and business telephone numbers of employees of an organization. Information that, by itself, cannot be explicitly linked with your “real” identity is also not considered personal information. Examples of this are statistical inventory information indicating the number of products purchased from us without indicating who purchased the products.

The types of personal information that we may collect about you in the course of conducting our business include:

- contact and identification information such as your name, address, telephone number, email address, facsimile number and your occupation.
- financial and credit information such as bank and credit card numbers, credit report information and transaction history (about you or other members of your family).
- property information such as details of your product purchases from us.
- information about your product preferences.
- other miscellaneous information such as your driver’s license number.

The extent and type of personal information collected from you depends on the nature of your business dealings with us. Personal information may be collected when you purchase products or services, when you have us service or repair products or equipment, when you finance the purchase of products or equipment from us, you participate in one of our surveys, contests or promotions or if you contact our staff.

### **Use of Collected Personal Information**

In connection with the operation of our business, the personal information which we collect is used for the following purposes:

1. to provide products and to perform services as may be requested by you;
2. to analyse the suitability of our products or services for your needs;
3. to determine your eligibility for some of our products and services, such as financing products and services;
4. to provide you with information about promotions, special offers and programs or services which may be of interest to you;
5. to respond to your specific questions or concerns;
6. to maintain a customer contact database;
7. to provide ongoing service to you;
8. to assist us with our marketing programs to identify broad market groups for specific promotional opportunities;
9. to invoice customers, process credit card payments and collect accounts;
10. to resolve disputes;
11. to comply with applicable legal and regulatory requirements, such as tax law requirements;
12. for any other use authorized or permitted by law.

### **Disclosure of Personal Information**

We do not share, sell or transfer your personal information which we collect to third parties for their own marketing efforts. Internally, we limit access to your personal information to those of our employees who need to have access to it for the performance of their duties. Like most businesses, we use third party service providers in connection with our provision of products and services to you. We disclose certain personal information to these third parties when they require the information to work with us. These third parties include credit card processors, credit report agencies, financial institutions and computer consultants and technicians. Where applicable, we also require that they follow appropriate privacy and security measures.

We may also disclose your personal information where we are required or permitted to do so by law.

### **Consent**

Generally speaking, we do not collect, use or disclose your personal information without your knowledge and consent. Notwithstanding this general rule, there are certain circumstances where the collection, use or disclosure of your personal information without your consent may occur. For example, these circumstances would include:

1. collection, use or disclosure where it is clearly in the best interest of the customer and his/her consent cannot be obtained in a timely way (for example, in the case of a medical emergency);

2. disclosure for the purpose of collecting a debt owed to us;
3. collection and use in investigating a breach of an agreement or a contravention of law;
4. disclosure to our legal counsel;
5. disclosure to comply with a subpoena or warrant; and
6. collection, use or disclosure where we are required or permitted by law or court order to do so.

Your consent can be express or implied or given through an authorized representative. It may be given verbally or in writing. If you voluntarily provide personal information to us, we will interpret this as consent for collection, use and disclosure of such information in the manner as described in this privacy policy. If you give us personal information about any other individual, you are warranting and agreeing with us that you have the authority to consent and are consenting on their behalf to the collection, use and disclosure of such information in the manner described in this privacy policy. If you choose not to provide your consent, you may refuse to provide us with your personal information, however, most of the personal information which we collect is necessary to provide you with the products or services which you have requested from us and without this personal information, we cannot do this.

Subject to applicable legal or contractual restrictions, you also have the right to withdraw your consent to our collection, use and disclosure of your personal information on reasonable notice. In certain situations, withdrawing your consent could mean that we would not be able to provide you with some product or service you have requested. For example, if you make a credit account application, however, do not allow us to obtain a credit history report, we may not be able to approve your application and arrange for your requested financing. In some cases, you can choose to opt out of receiving certain communications and offers by declining special offers or promotions where indicated. To be removed from any marketing lists on which you have agreed to be placed, please contact us at [info@wallace.sk.ca](mailto:info@wallace.sk.ca) for further information.

### **Accuracy, Access and Retention**

We take reasonable efforts to maintain the accuracy and completeness of the personal information which we have collected, however, we rely on our customers to provide us with accurate personal information and advise us of any changes to the same, such as, address changes. Subject to certain exceptions, as permitted or required by law, you have the right to access, verify and amend your personal information collected by us. Upon your written request, subject to various exceptions, we will advise you of the existence, use and disclosure of your personal information and will provide you with access to the information. Examples of when we would not be able to provide you with access to your personal information include when the information is protected by solicitor-client privilege, the information would reveal confidential commercial information, the information contains personal information about a third party which cannot be severed or where the information has been collected in the course of investigating the breach of an agreement or contravention of law.

Depending upon the volume of the personal information requested, we may charge a reasonable fee for the provision of the same. To access or amend your personal information, please contact us at [info@wallace.sk.ca](mailto:info@wallace.sk.ca).

We keep your personal information only for as long as needed to fulfil the purposes for which it was collected, to fulfil our obligations under this privacy policy and as may be required to comply with applicable laws.

### **How Do We Protect Your Personal Information?**

We are committed to protecting the security of your personal information while it is in our control. We maintain physical, procedural and technological security with respect to collected personal information to prevent unauthorized access, copying, use, theft or modification of your personal information. For example, our internet and contact information is protected by “firewalls” and password protected systems. With respect to communicating with us by email, please be advised that e-mail is not a fully secure medium and accordingly, your information may be intercepted without our consent by unscrupulous members of the public and, consequently, can be collected and used by others without your consent.

### **Website**

Internet users can visit our website without telling us who they are or revealing any personal information about themselves. Wallace does not collect information through our website that personally identifies individuals except when individuals provide such specific information voluntarily by e-mail or otherwise. In such cases, we may collect, store and use such information in the same manner as we do other correspondence sent to us.

When you use the Internet, your web browser or client software may transmit certain information to the servers that host the web sites you visit (“Technical Information”). This Technical Information may include the unique number assigned to your server or Internet connection, the capabilities and features of your computer, your geographic location, and your movement within and interaction with the website, including what pages you look at and what information you download. When you visit our website, our servers collect such information. We use this information to generate aggregate statistics about visitors to our web site and to optimize our web service.

In some cases “cookies” (i.e., very small text files sent to your computer, which temporarily reside in your computer’s hard drive) may be used to assist your computer to navigate through websites more quickly and to allow website owners to better understand how visitors use their websites. We do not use cookies to track what you do when you are or are not on our website or to collect personal information about you.

We will not attempt to link or match the anonymous Technical Information we collect with any personal information unless:

- (a) we have your consent;
- (b) we are investigating detected or suspected security breaches, and need to do so in order to carry out the investigation; or
- (c) we are required by law to do so.

### **Links to Other Sites**

Users should be aware that when you are on the site, you could be directed to other sites that are beyond our control. There are links to other sites from the web site pages that take you outside our service. For example, if you “click” on a supplier, the “click” takes you off the web site. This includes links from advertisers, sponsors, and partners that may use the Wallace logo as part of a co-branding agreement.

We are not responsible for the content of or the privacy practices, policies, security measures, or actions of those third party web sites. You are encouraged to view the privacy policies of those web sites and to make an informed decision whether or not to use the web sites or to provide your personal information to the web site operators.

### **Changes to this Policy**

From time to time, Wallace may change or update our privacy policy from time to time as part of our periodic review of our policies and procedures or in connection with our introduction of new features and services.

### **Further Information**

If you have any questions, concerns or complaints regarding our privacy policies or if you wish to withdraw your consent to our collection, use and disclosure of your personal information, please contact us at [info@wallace.sk.ca](mailto:info@wallace.sk.ca).

**This policy is made in respect of the *Personal Information Protection and Electronic Documents Act (Canada)* and *The Personal Information Protection Act (Alberta)*. This legislation is complex and provides some additional exceptions to the general privacy principles that are set out in this policy. This privacy policy is intended to be a general statement of our privacy principles, however, does not contain a full detailed list of the exceptions to the privacy policies permitted by the legislation.**