



ELREG DISTRIBUTORS LTD. PRIVACY POLICY

Elreg recognizes the importance of privacy and the sensitivity of personal information. As a responsible distribution company and provider of product and services, we are committed to protecting the confidentiality of personal information provided to us and ensuring that all personal information we hold is collected, used and disclosed in compliance with all applicable federal and provincial privacy requirements. This Privacy Policy outlines how we manage personal information of our customers and others and safeguard their privacy.

Privacy Rights

As of January 1, 2004, all organizations engaged in commercial activities must comply with the Personal Information Protection and Electronic Documents Act (the "Act"), for personal information collected, used and disclosed within the province.

Elreg is responsible for the personal information we collect, use, maintain and disclose. To ensure this accountability, we have developed this policy, and trained our employees about our policies and practices.

What is "personal information?"

Personal information is generally any information that identifies an individual, or by which their identity could be deduced. However, it does not include their name, business address, business title, professional designation(s) or business telephone number(s).

Why do we collect personal information from our customers?

We collect personal information from our customers to:

- Enable us to process orders and deliver product.
- Provide support and service for the products that we sell to you.
- Assess your credit worthiness; extend credit; service and collect on account.
- Initiate, maintain and develop our business relationship with you.
- Establish your eligibility for special offers and discounts by monitoring your purchase history.

How do we collect personal information?

We collect information only by lawful and fair means and not in an unreasonably intrusive way. We collect this information directly from you the customer and here are some examples of other sources where we might collect the information:

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Phone: (905) 336-8830 Fax: (905) 336-8873 WAT: 1-800-387-4078*

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- References that you the customer provide to determine your credit worthiness;
- Government agencies or departments that keep information that are of public record; or
- Related businesses that provide service to you or are a customer of yours.

Consent

We ask customers to provide explicit consent if we collect, use, or disclose their personal information, or rely upon the express consents obtained by the employees that represent us. We may ask for consent in writing in some circumstances and in others we may accept a verbal consent. Sometimes, consent may also be implied through conduct with us.

Use of Personal Information

We use personal information to provide product and services to customers, to maintain our customer database and to include our customers in any direct marketing activities or other informational distributions of material. If we are notified that a customer no longer wishes to receive information regarding our products and services, we will not send any further material.

Elreg does not disclose personal information to any third party to enable them to market their products and services. For example, we do not provide our customer mailing lists to other businesses.

Disclosure of Personal Information

Under certain circumstances, Elreg will disclose personal information:

- When we are required or authorized by law to do so, for example if a court issues a subpoena;
- When the individual in question has consented to the disclosure;
- Where it is necessary to establish or collect monies owing to us;
- If we engage a third party to provide administrative services to us (like computer back-up services or archival file storage) and the third party is bound by our privacy policy; or
- If the information is already publicly known.

Updating Information

Since we use personal information to provide product and services to our customers, it is important that the information be accurate and up-to-date.

If any information regarding a customer changes, we ask the customer to inform us promptly of the change so that we can make any necessary changes to our records.

Is Personal Information Secure?

An individual may ask for access to any personal information we hold on them.

Correcting Errors

If Elreg holds information about an individual and the individual can establish that it is not accurate, complete and up-to-date, Elreg will take reasonable steps to correct it.

Can an individual be Denied Access to their Personal Information?

An individual's rights to access their personal information are not absolute.

We may deny access when:

- Denial of access is required by law;
- Information relates to existing or anticipated legal proceedings;
- When granting access would have an unreasonable impact on other people's privacy;
- To protect Elreg's rights and property; or
- Where the request is frivolous or vexatious.

If we deny a request for access to, or refuse a request to correct information, we shall explain why.

Elreg does not use Social Insurance Numbers as a way of identifying or organizing the information we hold about clients or others.

Credit Bureaus

To help us make credit decisions about customers and check the identity of new customers, we may on occasion, request information about customers from the files of consumer reporting agencies.

How Long do we Keep Personal Information?

We keep personal information as long as is reasonably necessary for us to complete our dealings with an individual, or as may be required by law, whichever is longer.

Communicating with Us

All of our customers should know that email is not a 100% secure medium, and should be aware of this when contacting us to send personal or confidential information.

Changes to this Privacy Policy

Elreg regularly reviews all of its policies and procedures and we may change our Privacy Policy from time to time.

Employment Inquiries

Although the Act does not apply to our employee information, we have elected to follow privacy “best practices” in this area. If an individual applies to Elreg for employment, we need to consider their personal information as part of our review process. We normally retain information from employment candidates after a decision has been made, unless they ask us not to retain the information. If we offer a person a job, and they accept, the information will be retained in accordance with our privacy procedures for employee records.

Web Site

Our website may contain links to other sites, which are not governed by our Privacy Policy.

On our website, like most other commercial websites, we may also monitor traffic patterns, site usage and related site information in order to optimize our web services. We may also provide aggregated information to third parties, but these statistics do not include any identifiable personal information.

Request for Access

Any questions, or requests for access to personal information, should be directed to our Privacy Officer at:

Niki Jell
Privacy Officer
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Burlington, Ontario, L7L 5V5
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