



Gardex Chemicals Ltd.

## Gardex Chemicals Client Privacy Policy

### Our Commitment to Privacy

Gardex Chemicals understands that protecting the privacy and confidentiality of your personal information is of the utmost importance. Collection, use and disclosure of personal information by Gardex Chemicals is governed by the *Personal Information Protection and Electronic Documents Act* (the “Act”), and any applicable substantially similar provincial legislation. This Privacy Policy explains the types of customer personal information we collect, how it is used, and the steps we take to ensure your personal information is handled appropriately. This Privacy Policy applies to personal information (see description below) collected by Gardex Chemicals, including via our website. Be aware that our website may contain links to other websites provided and maintained exclusively by third parties not subject to Gardex Chemicals’ Privacy Policy. Please review the privacy policies on any external websites to determine their information handling practices.

### What is personal information?

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as, but not limited to, name, address, telephone number, ID numbers, birth date or opinions. Personal information does not include the name, title, business address or telephone number of an employee of an organization. Also, information about individuals contained in the following documents is not considered personal information:

- Public telephone directories, where the subscriber can refuse to be listed;
- Professional and business directories available to the public;
- Certain public registries and court records;
- Certain other publicly available printed and electronic publications.

### The Ten Privacy Principles

This Privacy Policy has been developed in accordance with the standards set out in PIPEDA and any applicable substantially similar provincial legislation and is modeled after the *Canadian Standards Association Model Code for the Protection of Personal Information, CAN/CSA-Q830-96 (the “CSA Code”)*.

#### **PRINCIPLE 1 – ACCOUNTABILITY**

*An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization’s compliance with the procedures and principles set out in this Privacy Policy.*

Gardex Chemicals is responsible for all personal information under its control, including any personal information that is transferred to third parties for processing, storage or other purpose. The name and contact information of the Chief Privacy Officer shall be made available upon request. The Chief Privacy Officer may, from time to time, designate one or more individuals within the organization to act on his or her behalf.

#### **PRINCIPLE 2 – IDENTIFYING PURPOSE**

*The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.*

Gardex Chemicals identifies the purpose for which your personal information is collected at or before the time the information is actually collected.

#### **PRINCIPLE 3 – CONSENT**

*The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate.*

Gardex Chemicals obtains your consent to collect, use or disclose personal information, except where inappropriate. The method of obtaining consent is appropriate to the type of personal information being collected, used or disclosed:

- Gardex Chemicals will obtain your express consent (verbal, written or electronic agreement) to collect, use or disclose sensitive personal information.
- Gardex Chemicals will use implied consent to collect, use or disclose your personal information where one or more of the following apply:
  - A customer relationship already exists
  - Express consent has previously been given
  - Where the purpose of using the personal information is reasonably apparent to you

#### **PRINCIPLE 4 – LIMITING COLLECTION**

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

Gardex Chemicals collects only the information necessary to provide our products to you. Gardex Chemicals will collect personal information only by fair and lawful means.

#### **PRINCIPLE 5 – LIMITING USE, DISCLOSURE & RETENTION**

*Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by the law. Personal information shall be retained only as long as necessary for the fulfilment of those purposes.*

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Gardex Chemicals does not sell or rent personal information to any organization or person for any reason. Gardex Chemicals retains your personal information only as long as it is required for our business relationship or as required by law.

#### **PRINCIPLE 6 – ACCURACY**

*Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.*

Gardex Chemicals keeps your personal information up-to-date, accurate and relevant for its intended use. You may request access to the personal information we have on record in order to review and amend the information, as appropriate. To access your personal information, refer to the *How to Contact Us* section below.

#### **PRINCIPLE 7 – SAFEGUARDS**

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

Gardex Chemicals takes the appropriate steps to safeguard your personal information, regardless of the format in which it is held. These safeguards include:

- Physical security measures such as restricted access facilities and locked filing cabinets;
- Electronic security measures for computerized personal information such as password protection;
- Organizational processes such as limiting access to your personal information to a selected group of individuals.

#### **PRINCIPLE 8 – OPENNESS**

*An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.*

Gardex Chemicals will make readily available to individuals specific information about its policies and practices relating to the management of personal information. This policy and any related information is available at all times on our web site, [www.gardexinc.com](http://www.gardexinc.com) or on request. To contact us, refer to the *How to Contact Us* section below.

## **PRINCIPLE 9 – INDIVIDUAL ACCESS**

*Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.*

You can request access to your personal information. To contact us, refer to the *How to Contact Us* section below. Upon receiving a request, Gardex Chemicals will:

- Inform you about what type of personal information we have on record, how it is used and to whom it may have been disclosed;
- Provide you with access to your information so that you can review and verify the accuracy and completeness and request changes to the information;
- Make any necessary updates to your personal information.

## **PRINCIPLE 10 – CHALLENGING COMPLIANCE**

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

Gardex Chemicals responds in a timely manner to your questions, concerns and complaints about the privacy of your personal information and our privacy policies and procedures.

### **How to Contact Us**

- By calling our Customer Relations Centre at 1-800-563-4273, ext. 225
- By email to [privacy@gardexinc.com](mailto:privacy@gardexinc.com)
- By mail to Gardex Chemicals, Privacy Office, 7 Meridian Road, Etobicoke, ON M9W 4Z6