# **Privacy Policy**

This privacy policy sets out how Union Powered Inc. uses and protects any information that you give Union Powered Inc. when you visit unionpowered.ca (the "website").

Union Powered Inc. is committed to ensuring that your privacy is protected. Should you provide personal information when using this website, then you can be assured that it will only be used in accordance with this privacy policy. Personal information is any information by which you can identified, directly or indirectly, either alone or in combination with any other information.

Union Powered Inc. may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. Your continued use of the website following the posting of changes will mean that you accept and agree to the changes. This policy is effective from July 11, 2016.

#### What we collect

We may collect personal information from you when you register on the website, place an order, or fill out a form. When ordering or registering on our site, as appropriate, you may be asked to enter the following information:

- name and address
- contact information including phone and email address
- payment information (such as credit card information)
- demographic information such as gender, age,, preferences and interests
- information about your union/local
- information about your employment status and employment history, such as your title and entitlements
- other information relevant to customer surveys and/or offers

#### What we do with the information we gather

We require this personal information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping.
- Personalize your experience.
- Improve our products and services.
- Process transactions.
- Periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your personal information to contact you for market research purposes. We may contact you by email, phone, fax or mail. Information used for market research is anonymized, meaning that it cannot be used to identify you either alone or in combination with another data set.

#### When we may disclose your personal information

We may disclose your personal information under the following circumstances:

- To third-party service providers who assist us in operating our business and providing services (e.g., payment processors, shipping partners).
- When required by law or to comply with legal processes.
- In connection with the sale, merger, or acquisition of all or part of our business, provided that the recipient agrees to protect your personal information according to this policy.

• For any other purpose disclosed by us when you provide your personal information or as otherwise permitted or required by applicable law

Union Powered Inc. is owned by Digital Grounds Inc. We may disclose your personal information to Digital Grounds Inc. for the purposes of technical support or to improve our services. Digital Grounds Inc. does not use personal information that we disclose to them for their own purposes.

We may store, process and/or transfer your personal information outside your jurisdiction of residence. Consequently, your personal information may be subject to the local laws of the jurisdiction to which it is transferred, and it may be accessible to local governments, tribunals, law enforcement and regulatory agencies.

#### Security

We are committed to ensuring that your personal information is secure. In order to prevent unauthorized access, use, disclosure, or any other breach, we have put in place suitable physical, technical and organizational procedures to safeguard and secure the personal information we collect. We offer the use of a secure server.

We further protect personal information by restricting access to those employees that the management of Union Powered has determined need to know that information to fulfil their responsibilities.

All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our payment gateway providers database only to be accessible by those authorized with special access rights to such systems and are required to keep the information confidential.

#### Retention

We retain your personal information only as long as it is required to accomplish the purposes for which it was collected, or to comply with applicable laws. The length of time we retain information varies, depending on the purpose for which it was collected, the nature of the information, and applicable laws. The retention period may extend beyond the end of your relationship with us, but only for as long as it is necessary for us to have sufficient information to comply with our legal obligations, communicate with you or to respond to any issues that may arise at a later date.

When your personal information is no longer required, we have procedures in place to destroy, delete, erase or anonymize it.

#### How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. The cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any personal information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## Your Rights

You may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at info@unionpowered.ca, Union Powered Inc, 451 Queen St. East, PO Box 4, Sault Ste. Marie, ON, P6A 1Z5

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

Subject to applicable law, you have the right to access and correct your personal information held by us. We will respond to your request within thirty (30) days following its reception. To guard against fraudulent access or correction requests, we may require sufficient information to allow us to confirm that the person making the request is authorized to do so before granting access or making corrections.

Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure. We will not charge you for accessing or correcting your information, however, to the extent permitted by applicable law, there may be a minimal charge imposed if you need a copy of records.

You have the right to withdraw your consent to the collection, use, and disclosure of your information at any time. However, your choice to withdraw your consent will not effect any collection, use, or disclosure of your information that occurred prior to you withdrawing your consent.

As required or permitted by law, you may be entitled to additional rights, including: (i) the right to control the dissemination of your personal information; (ii) the right to receive computerized personal information collected from you in a structured, commonly used and technological format and to have this information transferred directly to another organization; (iii) the right to be informed of and submit observations regarding automated decision-making; and (iv) the right to request information about data processing.

Finally, you also have a right to lodge a complaint with a competent data protection authority, in particular in the region where you normally reside, where we are based or where an alleged infringement of data protection law has taken place.

# Contact Us

In the event that you wish to contact us regarding:

- (i) exercising your rights in relation to your personal information;
- (ii) our collection, use, management or disclosure of personal information; or
- (iii) any other information contained in this policy;

Please contact our Privacy Officer by sending an e-mail to <u>privacy@unionpowered.ca</u> or write to us at Union Powered Inc, 451 Queen St. East, PO Box 4, Sault Ste. Marie, ON, P6A 1Z5.