



## **TAYCO'S PRIVACY POLICY**

Tayco Panelink LTD. (Tayco), is an established office furniture manufacturer with its head office located in Toronto, Ontario, Canada. We sell and distribute our office systems, casegoods and related products through a network of Independent Representatives and Dealers throughout North America.

Tayco.com is a fantastic resource to provide information about our products and services, as well giving visitors the opportunity to contact us and sign up for our mailing list. Tayco.com's dedicated web servers are located in Toronto, Ontario, Canada.

We are committed to protecting the privacy of the Personal Information provided to, or collected by us when visiting Tayco.com or otherwise during the course of your business with us. This Policy describes the type of Personal Information we collect, how we use and share that information, how we protect that information, your choices regarding that information, and how you can contact us with any questions.

### **SCOPE**

The Policy applies to all Personal Information Tayco collects, uses or discloses in the course of conducting its business. The Policy does not apply to Personal Information about Tayco's employees that is collected, used or disclosed for the purposes of managing the employment relationship.

### **WHAT IS PERSONAL INFORMATION**

**Personal Information** is information about an identifiable individual. Personal information is broadly defined and includes, but is not limited to age, date of birth, driver's license number, medical information, credit information, social insurance number, banking information, credit card number, financial institution account number, employment history, etc.

**Personal Information is not** information that has been stripped of its personal identifiers which cannot be traced back or associated with the person the information relates to. Personal Information does not encompass the name, title or business address, business e-mail address or business telephone number of an employee of an organization.

### **PURPOSE OF COLLECTION**

Tayco may collect Personal Information for the following purposes:

- To provide the products and services you request
- To process, manage, complete and account for transactions
- For marketing purposes, such as e-mail and newsletter distribution
- For the purposes of following up on potential business leads or potential Customers
- To communicate new information about our products, services and the company
- To analyze market trends to help us improve our products and services
- For Customer service purposes
- To operate, evaluate and improve our business, including developing new products and services, managing our communications, performing research and administering our website and other programs, and for auditing purposes;
- To comply with the law; or,
- For any purpose ancillary to the purposes outlined above.



Tayco will limit its collection of Personal Information to the information necessary to accomplish the purpose. If Tayco collects Personal Information for any purpose other than those addressed above, such purpose will be identified and documented prior to or at the time of collection. If Personal Information that has been collected is to be used for a purpose not previously identified, the new purpose shall be identified prior to use.

Often, Tayco does not have direct contact with its End Users and therefore relies on its Independent Representatives and Dealer Partners to communicate purposes for which Tayco will collect Personal Information before or at the time such Personal Information is collected by the Independent Representative and/or Dealer Partner and to obtain the End User's consent to collect, use and disclose Personal Information.

Consent in this context may be implied as the purpose for Tayco collecting and using the Personal Information is obvious when the goods are purchased for delivery. A Customer may withhold or withdraw consent at any time except where doing so is contrary to legal or contractual restrictions.

### **INFORMATION COLLECTED**

In order to fulfill the purposes as set out above, Tayco may collect the following Personal Information:

- name
- address
- other contact information such as e-mail address and phone number
- credit card information or other information with respect to method of payment
- other information collected through automatic data collection technologies including Cookies, Browser Cookies or Flash Cookies

You may restrict our email and newsletter communication at any time by clicking the "Unsubscribe" button at the bottom of our email or by replying to the individual who contacted you informing them you do not want our information sent to you.

### **SECURITY**

Tayco uses reasonable and appropriate organizational, technical and administrative measures to protect Personal Information under our control from loss, misuse, unauthorized access, or disclosure.

With respect to Personal Information received electronically, Tayco takes the following precautions to ensure the security of Personal Information collected, transmitted and stored in an electronic form:

- Advanced encryption technology
- System firewalls
- Computer Passwords

### **RETENTION AND DESTRUCTION**

Personal Information is retained only as long as necessary to fulfill the purpose for which it was collected. Personal Information that has been used to make a decision about an individual shall be retained long enough to allow the individual access to the information after the decision has been made. Personal Information that is the subject of a request for access under the *Personal Information Protection and*



*Electronic Documents Act* (“PIPEDA”) shall be retained as long as necessary to allow the individual time to exhaust all recourse under PIPEDA.

When Personal Information is no longer required to fulfill the identified purpose, it shall be destroyed, deleted, erased or converted into an anonymous form. Paper files containing Personal Information are shredded. Personal Information in electronic files is destroyed in any of the following ways:

- With wiping utilities provided by various software companies.
- By deleting the information using procedures that resist simple recovery methods such as data recovery utilities and keystroke recovery attempts.
- By overwriting which can be done using software and hardware products that overwrite the media with non-sensitive data.

### **ACCURACY**

Tayco will make reasonable efforts to ensure the accuracy and completeness of the Personal Information collected, used and disclosed.

### **INDIVIDUAL ACCESS, CORRECTION & CHALLENGING COMPLIANCE**

Upon request, Tayco will inform you of the existence of Personal Information that it holds about you and the circumstances in which your Personal Information was used, including the identity of any third parties to whom it was disclosed.

Subject to limited exceptions and upon request, Tayco will provide you with access to your Personal Information. Exceptions to the right of access include but are not limited to circumstances in which it would be prohibitively costly to provide access to the Personal Information, the Personal Information contains references to other individuals and such information cannot be severed, the Personal Information cannot be disclosed for legal, security, or commercial proprietary reasons, and the Personal Information is subject to solicitor-client or litigation privilege.

You may request that Tayco correct inaccurate or incomplete Personal Information. Where it is able to do so, Tayco shall make the necessary correction or if the information is located in records received from third parties, appropriately notify the third party of the existence of the inaccuracy.

All requests under this section of the Policy must be made in writing to Emily Boland (Marketing Manager) and must be sufficiently detailed to enable Tayco to understand and respond to the request.

Tayco will respond to requests under this section of the Policy within thirty (30) business days or such shorter time as may be required by law. If Tayco is unable to respond within thirty (30) days it will provide a written notice of an extension of the timeline for responding.

If there is a minimal cost associated with a request under this section of the Policy, Tayco will notify you of the cost in advance of satisfying the request at which time Tayco will ask you whether or not you wish to proceed with the request.

Where a request made under this section is refused in full or in part, Tayco will notify you in writing and will provide the reasons for refusal as well any recourse that may be available to you. Where your request to correct Personal Information is denied, Tayco will maintain a record of the request and denial.



Complaints, concerns or questions regarding Tayco's compliance with this Policy or with applicable privacy laws should be made in writing to Dan Fudge, VP Finance. If he is unable to resolve the complaint or concern, the concern/complaint can be pursued with the Information and Privacy Commissioner of Ontario.

Tayco will notify any affected Independent Representative of a request or complaint made under this section of the Policy including any correction made to Personal Information following such request.

#### **DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES**

From time to time, Tayco receives Personal Information from various sources, including but not limited to, personal contacts, market intelligence and end user inquiries, regarding potential Customers. Tayco may provide the Personal Information of these potential Customers to its Independent Representatives or Dealer Partners for follow up. Tayco will provide its Independent Representatives or Dealer Partners with only the Personal Information necessary to meet this purpose.

Tayco uses a third party to deliver its products. Tayco may provide a third-party delivery company with Personal Information necessary to accomplish this purpose. Tayco will limit its disclosure to the Personal Information necessary to meet this purpose.

Tayco does not sell, trade or rent any personal information either voluntarily provided to us or gathered through automatic data collection technologies, to third parties.

#### **QUESTIONS, CONCERNS OR COMPLAINTS**

If you have a question, concern, complaint or require more information about this Policy or the handling of your Personal Information please contact us via email at [privacy@tayco.com](mailto:privacy@tayco.com) or by mail to Emily Boland, Marketing Department, 400 Norris Glen Road, Toronto, Ontario, Canada, M9C 1H5.