

PRIVACY POLICY, Waterloo Manufacturing Company Limited

TO: All customers, potential commercial contacts and other individuals involved commercially with Waterloo Manufacturing Company Limited (the "Corporation")

As of January 1, 2004, The Personal Information Protection and Electronic Documents Act ("PIPEDA") applies to the Corporation. The legislation applies whenever "personal information", as that term is defined in PIPEDA, is used for commercial purposes. To comply with PIPEDA, we have prepared this Privacy Policy and Plan which we intend to follow.

As a customer, you now have rights relating to (a) the collection, (b) the use of and (c) the disclosure of what is termed "personal information". The Corporation intends to in all respects follow the "Model Code" prepared by the Canadian Standards Association with respect to the treatment and handling of personal information. A copy of the Model Code is available from our Privacy Officer, whose identity at the present time is Mr. John Kraemer, Jr. who can be reached at 519-884-0600. In short, the Model Code requires the following:

1. the Corporation must have a Privacy Officer;
2. the purposes for collecting personal information must be communicated to you;
3. **you must first consent before any of your personal information can be collected, used or disclosed;**
4. the Corporation can only collect personal information for necessary purposes;
5. the Corporation can only use personal information for disclosed purposes;
6. the Corporation must ensure that the information collected is complete and accurate;
7. the Corporation must take adequate measures to preserve the security and confidentiality of the personal information;
8. the Corporation must be open about all of its privacy policies under PIPEDA;
9. if requested, the Corporation must (i) inform you that it does or does not possess the individual's personal information, (ii) inform you that it has disclosed personal information to any third party and the identity of that third party (or parties), and (iii) allow you access to the individual's personal information; and
10. the Corporation must communicate clearly that you have a right to challenge the Corporation's privacy policies.

Information Collected: For the purposes of this Policy, we anticipate collecting, using and/or disclosing the following types of personal information according to the circumstances or type of service or product that is being provided to you:

1. As applicable, Your Name, Home or Business Address, Home or Business e-mail and Home or Business Telephone Number;
2. In certain cases, Your Visa or Mastercard Information;
3. In certain cases, Financial or Credit Information.

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Information Used and Disclosed: We want you to understand first and foremost that **we already treat this type of information with the highest degree of confidentiality and security.** In large measure, we collect and use this personal information as a direct result of the requirements imposed upon us by our various suppliers of products. It is our intention to ensure that any such supplier who receives your personal information from us shall have a privacy policy in place at least equivalent to ours. We have collected, used and/or disclosed and anticipate collecting, using and/or disclosing personal information for the following potential and actual purposes:

1. for use in our Start-up forms for customers or suppliers;
2. in the case of credit card information, for verification of sales of product;
3. for in-house marketing, survey, data collection and other activities, including entry into a database for purposes of sending you relevant newsletters on our activities or services that may interest you, etc., **specifically excluding any sale or disclosure to any third-party marketing company;**
4. for inclusion in the Corporation’s database which group data may be used on our website, **with the understanding that no information will be permitted to be displayed on the website which might allow a third part to infer or determine your identity;**
5. disclosure on an as-necessary basis to the solicitors, accountants and other specialized professionals utilized by the Corporation;
6. any future contemplated sale, purchase or change in ownership or structure of the Corporation to which our client list and knowledge thereof will represent a significant asset, **with the understanding that any purchaser or new owner will be subject to the same strictures and need to abide by the same privacy policies as we have in place at that time;** and
7. for proper management and maintenance of our accounts payable and accounts receivable;
8. in the case of supplier, for inclusion in our submissions for publication with certain relevant business directories (eg. Cleaver-Brooks, DeDietrich, Fulton);
9. to conduct credit checks and credit reporting as reasonably deemed necessary by the Corporation;
10. as necessary to complete any packing slips or shipping instructions for products;
11. as necessary for the purposes of any applicable insurance coverage for the Corporation or its products and for proper management and maintenance of warranty program for products.

If any other purposes manifest, the Corporation will provide notice of these to you and will request consent at that time.

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There are certain exceptions for which consent is not required. For collecting personal information they are:

- a. it is clearly in your interest and there is not enough time to get your consent;
- b. it is required by law;
- c. the information is already publicly available (such as in a business directory or telephone directory)
- d. collecting the information with consent will taint or distort the accuracy of the collected information;
- e. it is for journalistic, artistic or literary purposes only.

For using personal information they are:

- a) it is clearly in your interest and there is not enough time to get your consent;
- b) it is required by law;
- c) the information is already publicly available;
- d) to prevent an unlawful act from taking place to which the information is relevant;
- e) in an emergency situation, where your life or health is at stake;
- f) for statistical, scholarly or research purposes, within the parameters specified by PIPEDA.

For disclosing personal information they are:

- a) to a solicitor representing the Corporation;
- b) to assist in collecting a debt owed by you to the Corporation;
- c) to an archival institution for the purpose of preserving records, within parameters specified by PIPEDA;
- d) all of the reasons stated above for using personal information.

PIPEDA will be enforced by the Privacy Commissioner of Canada. The Model Code details how you can lodge a complaint and the various steps to take. Should the Privacy Commissioner choose to conduct an investigation, we wish to assure you that everyone associated with Waterloo Manufacturing Company Limited will cooperate to the fullest extent possible.

We will also be taking measures to safeguard personal information, including keeping separate limited-access files and records (both manual and with our IT hierarchy/file structure) to secure and segregate your personal information, ensuring that the Privacy Officer will have primary control over and discretion within the Corporation regarding any consented-to collection, use or disclosure of personal information and other measures similar to those used for the protection of our own proprietary confidential information.

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Please also note that you are able to withdraw or withhold your consent at any time for those items of personal information that require consent. We must, however, inform you that withholding or withdrawing consent may hamper or impair our ability to effectively provide services or products to you as a customer or to continue doing business with you as a supplier or contractor. In keeping with the policies set down thus far by the Privacy Commissioner’s office, we are requesting that you actively grant your consent by completing the portion of this letter below and returning this portion to us by mail in the enclosed envelope or by fax transmission. If you would prefer not to receive mailings from us, we would ask that you indicate that preference in your consent below.

We wish to thank you for your continued patronage as our customer, contractor or supplier and we look forward to continuing our relationship with you.

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I, _____, hereby acknowledge and agree that:

1. I have read this letter and have had reasonable opportunity to review the Model Code and I understand the various purposes for which Waterloo Manufacturing Company Limited (“the Corporation”) may require my personal information;
2. I understand that the Corporation shall protect my personal information with the care and diligence required of it under the *Personal Information Protection and Electronic Documents Act* and shall not collect, use or disclose my personal information for any other purpose not set out here or provided for as an exception under the Act without my prior consent; and
3. I understand that the Corporation shall promulgate and keep in force a Privacy Policy that both I and the Corporation shall abide by and I understand my rights respecting my personal information as set out in the Model Code which will form the basis of the Corporation’s Privacy Policy;

And I hereby grant my consent to the Corporation to collect, use and disclose any information which can be regarded as personal information, whether or not collected, used and disclosed in the past, present or future for the above-stated purposes.

Date this _____ day of _____, 20__.
