

## SARMAZIAN BROTHERS LIMITED

### PRIVACY POLICY

**SARMAZIAN BROTHERS LIMITED (“SARMAZIAN”)** is committed to maintaining the privacy, accuracy and security of our customers’ Personal Information. We fulfill this commitment through our employee training and the safeguards used to protect your information and our policies, including this Privacy Policy.

“**Personal Information**” is information about you as an identifiable individual that is protected by law. This Privacy Policy explains:

- how and why we collect, use, and sometimes disclose Personal Information;
- how and when your informed consent will be requested (along with certain exceptions);
- how you can access your Personal Information that we hold; and
- who to contact if you have questions or concerns about your privacy.

#### **Application of this Privacy Policy:**

- 1. Who does this Privacy Policy apply to?** This Privacy Policy applies to individual customers of our products and services, and to SARMAZIAN, its affiliates and any successor companies. Our suppliers and authorized agents may have their own privacy policies.
- 2. What information does this Privacy Policy apply to?** All Personal Information that we collect, use or disclose about our customers is covered by this Privacy Policy. This may include information such as your name, mailing address, email address, phone number, and billing or service records. There are some exceptions created by applicable law to what might ordinarily be considered Personal Information. Professional contact information, such as your name, title, business address, telephone number and business e-mail address used in relation to your employment or business, is not covered by this Privacy Policy. Information about you, but which cannot be associated with you as an identifiable individual, is not considered to be Personal Information.

#### **Consent and Your Personal Information:**

- 3. Does SARMAZIAN need my consent to collect, use or disclose my Personal Information?** When it is reasonable in the circumstances, we will imply consent from your actions. For example, if you provide your address in the course of arranging delivery of products or services, we may use it to send you bills or other important notices related to your products and services. We would obtain express verbal or written consent before using Personal Information to perform a credit check or advertise our products or services by email. If it is impossible or inappropriate to obtain express consent, we may collect, use or disclose your information without your consent. For example:

- (a)** if it is clearly in your interests (such as a medical emergency or a threat to your safety);

- (b) to comply with a warrant or other court order;
- (c) to collect a debt;
- (d) to investigate the breach of an agreement or applicable law; or
- (e) as otherwise legally required or allowed.

#### **Collection, Use, Disclosure and Your Personal Information:**

**4. When does SARMAZIAN collect my Personal Information?** It depends on the purpose for collection and the product or service involved. Below are some examples of when we may collect Personal Information:

- (a) when you provide your Personal Information during the course of a transaction or via the contact form on our website; or
- (b) when we provide service to our customers, including during installation, warranty, repair claims and service process.

**5. How does SARMAZIAN use my Personal Information?** We use your Personal Information to provide you with our products or services. We may also use your Personal Information to:

- (a) establish and maintain responsible commercial relations with you and to provide ongoing service;
- (b) try to understand the needs and preferences of our customers, including through data analytics, and determine your eligibility for products and services;
- (c) recommend products and services to meet your needs;
- (d) develop, enhance, market or provide products and services;
- (e) manage and develop business operations; or
- (f) meet our legal and regulatory requirements.

Where necessary, we will request your further consent before using your Personal Information for any new purpose(s) beyond those described above.

**6. When is my Personal Information disclosed?** We may disclose some of your Personal Information in a variety of circumstances, such as when we have your express or implied consent. We may also disclose your Personal Information:

- (a) to a person acting as your agent (such as a legal representative or authorized user) if we are reasonably satisfied that the person is authorized to receive your Personal Information;
- (b) to our suppliers and authorized agents who assist with activities such as service installation or maintenance, subject to security safeguards;

- (c) to third-party collection agencies for the purpose of collecting amounts owed to us which are past due;
  - (d) to third-parties, such as credit reporting agencies or anyone you have had a payment relationship with, to assess creditworthiness or assist with the collection of amounts owed to us which are past due, and delivery organizations to ship you products and/or services you have ordered;
  - (e) to a government institution or another organization if reasonably necessary to establish your identity, or to investigate the contravention of a law or an agreement, or to prevent fraud;
  - (f) to an appropriate public authority in an emergency situation where there is imminent danger to life or property;
  - (g) as you have otherwise given us, or a third-party (like a financial institution, government agency, insurance company, social media or other online site) your consent to do so; or
  - (h) as otherwise allowed or required by law.
7. Where necessary, we will request your further consent before disclosing your Personal Information for any new purpose(s) beyond those described above.

#### **Withdrawing Your Consent:**

8. **Can I opt-out of the collection, use or disclosure of my Personal?** You can withdraw your consent from, or opt-out of, the collection, use or disclosure of your Personal Information in certain situations. For example, you can opt-out of your Personal Information being used for a variety of marketing communications by us, including individually addressed marketing mail, or commercial emails. Where your Personal Information is reasonably necessary in our view to provide you with the services you requested, you cannot continue to use the services and opt-out of the collection, use and disclosure of your Personal Information because it is a condition of service. To stop the collection, use and disclosure of your Personal Information in these circumstances, you must terminate the applicable service.

#### **Accuracy and Safeguarding of Your Personal Information:**

9. **How do I learn more about my Personal Information and if it is accurate?** You may contact us directly to review the Personal Information in your file. If we cannot provide you with access to your Personal Information, then we will advise you of the reason why. Our goal is to keep the Personal Information we hold about you accurate, up-to-date and complete. If you find an inaccuracy, let us know and we will correct it.
10. **How is my Personal Information protected?** We use appropriate technical and operational security safeguards which vary depending on the sensitivity of the Personal Information in question. All of our employees with access to Personal Information are required to respect the confidentiality of Personal Information. Personal Information we disclose to third-parties is governed by this Privacy Policy through comparable protections in our commercial agreements and is also protected by additional

safeguards, if required, depending on the sensitivity of the Personal Information involved.

**11. How long is my Personal Information kept?** Only as long as is reasonably necessary, or relevant for the identified purposes, or as required by law. We may have to keep Personal Information for an extended period of time for tax and financial record keeping, security, fraud prevention, and to manage business operations. Once Personal Information is no longer reasonably necessary, or relevant for the identified purposes, or required by law to be retained, your Personal Information is destroyed, erased or de-identified.

**Changes, Questions and Contact Information:**

**12. Can this Privacy Policy change?** We may change this Privacy Policy over time, in accordance with applicable laws. We will notify you of changes by posting the change on our website.

**13. Which laws apply to the collection, use and disclosure of my Personal Information?** We design our privacy practices to comply with applicable federal and provincial laws, including the *Personal Information Protection and Electronic Documents Act* and Canada's Anti-Spam Legislation.

**14. Questions or concerns about our privacy practices?** Please contact:

Sarmazian Flooring Limited  
575 Woodlawn Road West  
Guelph, Ontario N1K 1E9

Tel: 519-837-2120  
Fax: 519-837-2831  
Email: [tina@sarmazian.com](mailto:tina@sarmazian.com)