

# **REXEL CANADA ELECTRICAL INC.**

## **PRIVACY POLICY**

Rexel Canada Electrical Inc., its parent company and its subsidiaries (“**Rexel**”) is committed to maintaining the accuracy, security and privacy of personal information in accordance with applicable legislation. This Policy is a statement of principles and guidelines concerning the protection of personal information of our clients, service providers and other individuals (“**you**”).

### **CONSENT**

**BY SUBMITTING PERSONAL INFORMATION TO REXEL OR ITS AGENTS, YOU AGREE THAT WE MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting the Chief Privacy Officer of Rexel as indicated below. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you.**

## **1. Personal information collected**

For the purposes of this policy, personal information means information about an identifiable individual. Such information includes your name, home address, telephone number, personal email address, billing and account information, as well as other personal information you may provide to us from time to time.

## **2. Why is personal information collected?**

We collect your personal information for the purposes listed below:

**(a) To provide the product, information or service you requested**

If you are a customer, we use your name and address (postal and/or email) in order to deliver the product, information or service you requested and to follow up with you about the transaction (i.e., send a bill etc).

**(b) To process payment**

Your credit card number, debit card number, or banking information for pre-authorized payments is used only for processing payments and for presenting you with payment options - not for marketing purposes.

(c) **To send you information about products, information or services**

From time-to-time we may send you further information about our products and services.

(d) **Other purposes**

In addition, from time to time, we may use your personal information for the following purposes:

- to detect and protect Rexel and other third parties against error, fraud, theft and other illegal activity, and to audit compliance with Rexel policies and contractual obligations;
- to understand and respond to client, supplier and other third party needs and preferences, including to contact and communicate with such parties and to conduct surveys, research and evaluations;
- to engage in business transactions, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving Rexel;
- as permitted or required by law; and
- for any other purpose to which you consent.

If you would prefer for us NOT to use your information as described above in section 2(c), simply inform us (see "additional information" below).

### **3. Disclosure of personal information**

We may disclose your personal information to the following third parties in the following circumstances:

(a) **Disclosure to Service Providers**

We may disclose your personal information to other companies that provide services on our behalf, including financial institutions, securitization agents, external auditors or payment processors. In addition, we may disclose your personal information to an organization or individual retained by Rexel to evaluate your creditworthiness or to collect debts outstanding on an account or to our auditors. We will only provide those companies the information they need to deliver the service and they are prohibited from using that information for any other purpose.

(b) **Disclosure to Affiliates**

We may disclose your personal information to any of the companies and business entities that form part of the Rexel group (i.e. amongst Rexel Canada Electrical Inc., its subsidiaries and affiliates in order to serve you better and to provide you with information about our affiliates' products and services.

(c) **Disclosure to Trading Partners**

From time to time we may make their list of customers available to other carefully screened organizations that want to let you know about a product or service that might interest you. The material to be sent to you is reviewed by us before the names and addresses (including e-mail addresses) are released to ensure the company is reputable and their materials are appropriate and not misleading.

(d) **Disclosure in Business Transfers**

Rexel may be involved in the sale or transfer of some or all of its business. As part of that sale or transfer, Rexel may disclose your personal information to the acquiring organization, but will require the acquiring organization to agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy.

(e) **Law Enforcement and Legal Disclosure**

Rexel may disclose your personal information to a government institution that has asserted its lawful authority to obtain the information or where Rexel has reasonable grounds to believe the information could be useful in the investigation of unlawful activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with court rules regarding the production of records and information, or to Rexel's legal counsel.

If you would prefer for us NOT to share your information as described above in sections 3(b) or 3(c), simply inform us (see "[additional information](#)" below).

#### **4. Access to your personal information**

Upon your written request, subject to certain exceptions, Rexel will inform you of the existence, use, and disclosure of your personal information and will give you access to that information. Access requests should be sent to the Chief Privacy Officer, using the contact information below.

#### **5. Storage of personal information**

Your personal information is stored in secured locations and on servers controlled by Rexel or its service providers, located either at our offices or at the offices of our service providers.

#### **6. Protection of your personal information**

To help protect the confidentiality of your personal information, Rexel employs administrative and technological safeguards appropriate to the sensitivity of your personal information. Where personal information is sent to a third party for processing, we obtain a commitment from such third party, that all customer information is kept secure. We operate secure data networks protected by industry standard firewall and password protection systems.

## 7. Privacy and our Website

- (a) **Cookies** - When an individual visitor accesses a Rexel website, we may use a browser feature called a 'cookie' to collect information such as the type of Internet browser and operating system the visitor uses, the domain name of the website from which the visitor came, date and duration of the visit, number of visits, average time spent on our website, pages viewed and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies the visitor's browser, but not necessarily the visitor, to our computers each time our website is visited. Unless a visitor specifically informs us (e.g. by registering for an event or sending us correspondence from the website), we will not know who the individual visitors are. In addition to the identified purposes described in our Privacy Policy, we may use this website information and share it with other organizations with whom we have a commercial relationship to measure the use of our website, to improve the functionality and content of the website and to facilitate usage by a visitor. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on our website.
- (b) **Online Communications** – In order to provide our website visitors with a service or information, visitors may voluntarily submit personal information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, participating in a seminar or other event, and participating in contests and surveys. If you are known to Rexel as a registered user of an online service, we may combine and store personal information about your use of our website and the online information you have provided with certain other online and offline information we may have collected.
- (c) **E-Mail Communications** - Occasionally, we may send marketing or promotional e-mail communications to you with information that may be useful, including information about the services of Rexel and other third parties with whom we have a relationship. We will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future marketing or promotional e-mails from Rexel.
- (d) **Links** - Our website may contain links to other websites which are provided as a convenience only. Visitors are advised that other third party websites may have different privacy policies and practices than Rexel, and Rexel has no responsibility for such third party websites.

## **8. Changes to the Privacy Policy**

Rexel reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes on our Intranet or website and make such revised policy and changes available upon request to the Rexel Chief Privacy Officer. However, Rexel will obtain the necessary consents required under applicable Privacy Laws if it seeks to collect, use or disclose an individual's personal information for purposes other than those to which consent is obtained unless otherwise required or permitted by law.

## **9. Additional information**

Rexel has appointed the General Counsel as Chief Privacy Officer to oversee compliance with this Privacy Policy and applicable privacy laws. For information on Rexel's customers related privacy practices, please contact the Rexel Chief Privacy Officer as follows:

Rexel Chief Privacy Officer  
505, rue Locke,  
Bureau 200  
Ville St-Laurent, Québec  
H4T 1X7  
Fax: (514) 342-9838  
e-mail: [cpo.cprp@rexel.ca](mailto:cpo.cprp@rexel.ca)