

Your Privacy is Protected: Client Privacy Policy – Canada

Effective September 2017-10-06

Your Privacy Is Protected

At industrialvacuumunit.com an important part of our commitment to you is respect for your right to privacy. Keeping your information and affairs in strict confidence is a cornerstone of our business and an integral part of our commitment to service excellence.

This policy will help you better understand how industrialvacuumunit.com protects, collects, uses and discloses your personal information and your right to access your information. This policy applies to industrialvacuumunit.com's clients (including potential clients) in Canada. To understand the meaning of "personal information" and other terms used throughout this policy, please refer to the Important Terms section.

Copies of this policy are available online under the Privacy Notice section of industrialvacuumunit.com. industrialvacuumunit.com may amend this policy from time to time. For the most up to date version, please visit industrialvacuumunit.com.

Our Privacy Principles

industrialvacuumunit.com respects the following principles when collecting, using, disclosing and protecting your personal information.

1. Identifying Purposes and Obtaining Your Consent

☑ We identify the purposes for collecting personal information at or before the time it is collected.

☑ We obtain your consent before collecting, using or disclosing personal information, except where permitted or required by law.

2. Limiting the Collection, Use and Disclosure of Your Information

☑ We limit the personal information we collect to what is necessary for the purposes we have identified. We collect information only by fair and lawful means.

☑ We do not use or disclose personal information for purposes other than those for which it was collected, except with your consent, or where permitted or required by law. We retain personal information only as long as necessary for these purposes.

3. Keeping Your Information Accurate and Providing Access to Your Information

☑ We take care to keep personal information as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

☑ Upon request, we provide you with access to your personal information. You can ask how your information is used or disclosed, can ensure it is accurate and complete, and can update it if necessary.

4. Protecting Your Information

☑ We safeguard the privacy of personal information through security measures appropriate to the sensitivity of the information.

5. Addressing Your Concerns

☑ We are responsible for personal information under our control. There are designated individuals within industrialvacuumunit.com who are accountable for compliance with these privacy principles.

☑ We make available to you, information about our policies and practices related to managing your personal information.

☑ We address your concerns. We have steps you can follow if you have questions or concerns about your privacy.

Identifying Purposes and Obtaining Your Consent

We identify why we collect personal information and how we use it

We collect, use and disclose personal information about you throughout our relationship so we can:

- ☑ establish your identity
- ☑ protect you and us from error and fraud
- ☑ understand your needs and eligibility for products and services
- ☑ recommend particular products and services to meet your needs
- ☑ provide ongoing service
- ☑ comply with legal and regulatory requirements

If we need your information for any other purpose, we will identify that purpose. We obtain most of your personal information directly from you and through the products and services you use. Some information may be obtained from other sources. For example, with your consent, we may verify some of the information you give us with your employer or your references. Generally, when we obtain information from someone other than you, such as a credit bureau, we record the source of that information.

We may review and analyze your applications, transactions and other personal information. We may do this to offer solutions that help meet your needs, and to develop new products and strategies to meet the needs of our clients. We may also do this to help us identify various types of risks.

We may monitor and record telephone calls between you and our representatives to ensure accuracy, security, service quality and for training purposes.

Any personal information collected is protected as provided in this policy.

Your information is collected, used or disclosed with your consent.

When you apply for a product or service, we tell you about this policy and will obtain your consent. Depending on the product or service, this allows us to:

- ☑ offer you other products and services
- ☑ send you information about products and services by means of direct marketing
- ☑ share your information in confidence within the industrialvacuumunit.com group (provided it is legally permitted)
- ☑ obtain your information from, or disclose your information to, others that we tell you about

Also, if you authorize us, we may provide your information to your lawyer, accountant, or others you've identified. Except as explained in "There are exceptions to obtaining consent" under Part 2 of this policy, we don't disclose information about you to anyone outside of the industrialvacuumunit.com group without your consent. Similarly, if we intend to use your information for a purpose we didn't tell you about previously, we will obtain your consent.

There are many ways we may obtain your consent.

We may obtain your express consent in writing, through electronic means, or verbally.

Alternatively, your consent may be implied through an action you've taken or when you continue to use a product or service after we've notified you of a change. In some cases, we are required by law to obtain your express consent, in which case we ensure that we do so.

Examples of express consent:

- ☑ Written - You may sign an application that states "I agree to the Terms on the reverse."
- ☑ Electronic - You may be asked to electronically acknowledge that you will be bound by legal terms or agree to certain statements. Clicking "I Agree" is your electronic consent
- ☑ Electronic – use of industrialvacuumunit.com in any form provides implicit consent
- ☑ Verbal - industrialvacuumunit.com representative asks whether you agree to us obtaining your credit bureau information. Saying you agree is your verbal consent.

Example of implied consent:

☑ Action you've taken - If you have a industrialvacuumunit.com account and we inform you about revised conditions for the account, we can conclude that you agree to those conditions if you choose to continue using the industrialvacuumunit.com account.

Common consents and your options.

There are several common consents that may apply in your relationship with us. They are described below to help you understand when you can refuse or withdraw your consent and when this right is limited.

Refusing or withdrawing your consent will generally not affect your eligibility for industrialvacuumunit.com offers. However, if you refuse or withdraw your consent, we may not be able to provide you with a particular product or service. We'll explain the impact on you at the time, to help you with your decision.

You can choose not to receive direct marketing.

From time to time, we may offer you products and services - including special promotions - that we believe will be of interest to you through direct mail, telephone, e-mail or other means. This consent is optional and you can decide to withdraw it at any time. If you withdraw your consent to receive direct marketing, this will not limit the information provided to you through discussions with a industrialvacuumunit.com representative or information we may send you that is permitted or required by law or related to your existing products or services.

We share information within the industrialvacuumunit.com group.

We may share information about you within the industrialvacuumunit.com group for legal and regulatory purposes, to manage credit risk and other business risks, and to ensure we have correct and up to date information about you, such as your current address, date of birth, etc. You may not withdraw consent for this sharing.

We may also share your information to better manage your total relationship with the industrialvacuumunit.com group and enable other members of the industrialvacuumunit.com group to bring suitable products and services to your attention. industrialvacuumunit.com will share your information within the industrialvacuumunit.com group for these purposes unless prohibited by law or you tell us not to.

When you withdraw your consent, we will update your file as quickly as possible. It may take some time for our records to reflect your choice as many records can only be changed during regular file updates and your choice may not be captured for a promotion already in progress.

Limiting the Collection, Use and Disclosure of Your Information (Part 2)

We limit the personal information we collect.

While we collect various types of personal information from you and other sources, we limit the information to what is necessary for the purposes we've identified.

The information we ask for depends on the product or service requested. As well, we may need to ask new questions because of changes in legal and regulatory requirements.

Types of personal information we collect.

Here are some examples of information we are required to collect to provide our products and services:

"Know your client" information:

We require information to meet our various "know your client" legal and regulatory requirements. For example, we need your name, address, birth date, citizenship and identification for many products and services for legal and regulatory reasons. We may also be required to ask for information on how you use our products or services.

Financial information:

We require financial information in order to process orders for products offered at industrialvacuumunit.com.

Using, disclosing and retaining your personal information.

We do not use or disclose personal information for purposes other than those for which it was collected, except with your consent, or as described below. We retain personal information only as long as necessary for these purposes.

There are exceptions to obtaining consent.

There are exceptions where we may collect, use or disclose information without consent:

1. If we use an outside supplier to do work for us.

At times we may use outside suppliers to do work for us involving some of your information. For example, we may use suppliers to conduct telemarketing, collect accounts or process transactions on our behalf. We select suppliers carefully and insist they have privacy and security standards that meet industrialvacuumunit.com's strict requirements. Similarly, your payment transactions will be processed through payment systems or networks operated by others such as the Visa, MasterCard[®]2, Interac[®]3 or Canadian Payments Association's systems. We may share your information with these operators on a confidential basis to process transactions, provide customer service, and promote the service and for other reasonable purposes.

2. If we are permitted or required by law.

We may be compelled to release information by a court or other legal or regulatory authority. If so, our policy is to release information only to the extent that we are required to do so. We may also collect,

use or disclose information without consent where permitted by law. For example, we may collect and use publicly available information like information in the telephone book for marketing or customer service purposes. Further, for legal, medical or security reasons, it may be impossible or impractical for us to obtain your consent.

3. If we have to protect the interests of industrialvacuumunit.com.

In certain circumstances, industrialvacuumunit.com may have to collect, use or release information without consent for its protection. For example, we may do so when returning a cheque for "Non Sufficient Funds," when collecting an overdue account, or to detect or prevent fraud. If we cannot locate you, we may obtain contact information from other sources, including motor vehicle registries.

We may share information for business transactions.

From time to time, we may sell parts of our business, insure, sell or securitize assets, or merge or amalgamate parts of our business with other parties. Since client and account information will normally be a part of the transaction, we may disclose this information to other parties in the transaction, as part of due diligence and on completion of the transaction. We require that the other parties keep this information confidential and limit its use to the purposes of the transaction.

Information may be located outside of Canada.

industrialvacuumunit.com, its outside suppliers and other third parties to whom we disclose information under this policy (such as credit bureaus) may perform activities outside of Canada. As a result, your information may be securely used, stored or accessed in other countries and may be subject to the laws of those countries. For example, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement in these countries.

We retain your information.

The length of time we keep your information will vary depending on the product or service and the nature of the personal information. We have retention standards that meet customer service, legal and regulatory needs. For these reasons, we may keep your information beyond the end of your relationship with us.

When your information is no longer required, we securely destroy it or delete personally identifiable information.

Keeping Your Information Accurate and Providing Access to Your Information

We work with you to keep your information accurate.

We take care to keep the information in our records as accurate, complete and up to date as necessary for the purposes for which it is used. However, we also rely on you to tell us when your personal information changes.

It is important to ensure your personal information at industrialvacuumunit.com is accurate and complete. This allows us to continue to offer the highest quality service and to suggest products and services that best meet your needs.

To update your address and other personal information:

☑ sign on to industrialvacuumunit.com and edit your account information

You can access your information.

Much of your personal information is available to you by accessing your account online at industrialvacuumunit.com.

We may charge a fee to provide access to your information. We will let you know in advance if there is a charge.

If you have a sensory disability you may request your information to be made available in an alternative format. If we already have that format, we will provide it. Otherwise we will convert the information into the requested format if it is reasonable and necessary under legislation to enable access.

There may be limits on your right to access your information.

It may not be appropriate for us to release certain types of information to you. For example, our records may contain information about other clients, information that is confidential or proprietary to industrialvacuumunit.com, or information that is subject to legal privilege. Because we must protect everyone's confidentiality and legal rights, we cannot make this information available to you. However, where possible, we will suppress this information and provide you with access to the remaining records.

If we are unable to provide access or disclose information to you, we will explain why, subject to any legal or regulatory restrictions.

Your information and other parties.

If we have obtained information about you from others, you can ask us for the source of that information.

On request, and where legally permitted, we'll provide you with the names of outside companies or organizations to whom we've given or may have given your personal information. However, this won't include outside suppliers we've used to do work for us, such as conducting telemarketing, or processing information for us. This also won't include reports to the Canada Revenue Agency, particulars of cheques returned for the reason "Non Sufficient Funds" or information that has been provided for legal or regulatory reasons.

You can have your information corrected.

If you tell us that we have information about you that is obsolete or incorrect, we will update our records with the proper information. When appropriate, we'll correct any information which we may have given to an outside organization.

Protecting Your Information

How we protect your information.

We limit access to your personal information and store it securely. Depending on the nature of the information, it may be stored in various secure computer systems, or the record storage facilities of industrialvacuumunit.com or our outside suppliers.

In addition to the physical and electronic security devices we use to protect your information, we have security standards to protect our computer systems and your information from unauthorized use or access.

Our systems also protect your information when it is electronically transmitted, for example, between our data processing centres and partners. We regularly audit our information security procedures and assess that they remain effective and appropriate.

Employees who have access to your information are made aware of how to keep it confidential. Each employee must sign an agreement stating that maintaining confidentiality is a condition of employment with industrialvacuumunit.com. Also, each year employees undergo a review of our Code of Conduct and certify they will abide by industrialvacuumunit.com 's ethical and professional standards including the obligation of confidentiality and privacy.

We use contracts and other measures with our outside suppliers to maintain the confidentiality and security of your personal information and to prevent it from being used for any unauthorized purpose.

Access to your personal information is only given to those who require it to provide our products or services, or where permitted or required by law.

How you can protect your privacy.

There are some simple yet very important steps you can take to protect your privacy:

Notify industrialvacuumunit.com immediately if:

☒ you believe your personal or financial information has been compromised

☒ you believe you have been the victim of identity theft, or that someone is using your personal information fraudulently

Protect your Passwords.

Your passwords are the keys to your accounts. You are the only person who should know them.

Never disclose your current passwords to anyone, or you could be liable for losses. An industrialvacuumunit.com employee or agent will never ask you verbally or through e-mail for this information.

Regularly monitor your account activities.

Promptly check your statements or account to verify all transactions have been properly recorded. If entries do not accurately reflect your transaction activities (e.g. if there are missing or additional transactions), contact industrialvacuumunit.com immediately.

Ensure your contact information is up-to-date.

Making sure that industrialvacuumunit.com has your most up-to-date address or contact information will help protect your personal information from being misdirected. In "We work with you to keep your information accurate" under Part 3 of this policy, we explain how to check and update your personal information.

Protect your privacy online.

To protect your privacy online, you should clear your browser's cache after each session, use a firewall, and use up to date software to protect your computer from viruses and spyware.

As online privacy measures continue to evolve, we update the information in the Privacy & Security section of our web site. You'll find answers there to common questions about online security software, phishing and online fraud, web site activity (including cookies) and other steps you can take to protect yourself online.

Reduce your risk of identity theft:

☑ shred documents that contain personal or financial information before you throw them out

☑ request a copy of your credit bureau report periodically

☑ visit www.safecanada.ca and look for more identity theft information under the "Financial Safety" section

☑ don't give out personal information over the phone unless you have initiated the call or know who you are dealing with

If you receive a suspicious phone call, e-mail or letter, contact us.

If you think someone is impersonating industrialvacuumunit.com, or believe you have been the victim of a fraud or attempted fraud through telephone, mail or e-mail, contact industrialvacuumunit.com immediately.

Addressing Your Concerns (Part 5)

We are accountable for our compliance with this policy.

We have procedures in place to assist our employees in complying with this policy, as well as the federal Personal Information Protection and Electronic Documents Act and applicable provincial privacy legislation.

We regularly monitor our procedures and security measures to ensure that they remain effective and that they are being properly administered.

If you have any questions about our policies and practices related to managing your personal information that have not been answered in this policy, please let us know so that we may provide further information.

Resolving your concerns is important to us.

industrialvacuumunit.com is committed to treating you with the greatest respect and consideration and providing the highest level of service. Even so, there may be a misunderstanding or times where you may feel you have been dealt with unjustly. Whatever the circumstances, our primary objective is ensuring your concerns are addressed.

How to resolve concerns and complaints at industrialvacuumunit.com.

We are committed to upholding this policy. If you have any questions or complaints about this policy or about how we are living up to this policy, let us know right away.

The following process applies to industrialvacuumunit.com banking clients. For other industrialvacuumunit.com clients, (e.g. clients of industrialvacuumunit.com Private Investment Counsel or industrialvacuumunit.com Wood Gundy), refer to the process provided to you when you opened your account, contact the branch or office where your account is administered, or speak to your industrialvacuumunit.com representative.

Step 1: Talk to us

In most cases, a complaint or concern is resolved simply by talking to us about it. You should be able to get swift results by talking to a industrialvacuumunit.com representative at industrialvacuumunit.com.

If the above steps fail to resolve your concern you may also contact the Office of the Privacy Commissioner of Canada:

Place de Ville

112 Kent Street, 3rd Floor

Ottawa, ON

K1A 1h2

Call toll free at 1 800 282-1376

www.privcom.gc.ca

Important Terms Used in This Policy

When reading this policy you should be aware of the meanings we give to the following terms.

When we refer to "personal information" or "information" it means information about an identifiable individual. This includes details such as your age, marital status, education, employment history, identification numbers, financial information and credit records. Personal information does not include most of the information that appears on a business card.

When we refer to " industrialvacuumunit.com ", "we", "our" or "us" it means each of industrialvacuumunit.com operations including parent or subsidiary business ventures and operations that offer products and services. Together they are the " industrialvacuumunit.com group".

When we make reference to sharing information within the industrialvacuumunit.com group it means disclosure by one member of the group to some or all of the others.

When we refer to "permitted or required by law", and "legal and regulatory" requirements, authority or restrictions, this includes law, regulation, rules or requests of the regulators or self-regulatory organizations which apply to industrialvacuumunit.com.

At industrialvacuumunit.com, we are in the business to help our clients achieve what matters to them. Keeping your information and affairs in strict confidence is an integral part of our commitment to you.

We hope this policy provides you with the information you need to understand our privacy practices.