



Select Fireplaces Ltd.'s Privacy Policy

on the Collection, Use and Disclosure of Personal Information

Objective & Scope of Policy

Consistent with our professional obligations, Select Fireplaces Ltd. is dedicated to maintaining high standards of confidentiality with respect to the information that has been provided to us. This policy statement has been prepared to affirm our commitment to maintaining the privacy of our clients and others and to inform you of our practices concerning the collection, use and disclosure of Personal Information collected by Select Fireplaces Ltd.

Our obligations as professionals are governed by the *Alberta Freedom of Information and Protection of Privacy (FOIP) Act*, which imposes obligations regarding the way private sector organizations within Alberta collect, use and disclose personal information. These obligations apply to all professionals, employees, contractors and agents who provide services in connection with our delivery of services to our clients.

For the purposes of this Policy, "Personal Information" means any information, recorded in any form, about an identified individual, or an individual whose identity may be inferred or determined from the information. This policy does not cover any information, recorded in any form, about more than one individual where the identity of the individuals is not known and cannot be inferred from the information ("Aggregated Information"). Select Fireplaces Ltd. retains the right to use Aggregated Information in any way that it determines appropriate.

Using contractual or other arrangements, Select Fireplaces Ltd. shall ensure that agents, contractors or third party service providers, who may receive Personal Information in the course of providing services to Select Fireplaces Ltd. as part of our delivery of products and services, protect that Personal Information in a manner consistent with the principles articulated in this Policy Statement.

Professional Relationship

As a general rule, all information concerning the business and affairs of a person or organization acquired (1) for the purposes of determining whether Select Fireplaces Ltd. will enter into a professional relationship or (2) in the course of a professional relationship shall be held in strict confidence and not revealed to anyone unless expressly or implicitly authorized by the person or organization concerned. A professional relationship develops when Select Fireplaces Ltd. agrees to be retained to provide services to a particular individual or organization.

The Collection, Use & Disclosure of Personal Information

Your provision of Personal Information to Select Fireplaces Ltd. means that you agree and consent that we may collect, use and disclose your Personal Information in accordance with this Privacy Policy. If you do not agree with these terms, you are requested not to provide any Personal Information to Select Fireplaces Ltd. Unfortunately, certain services can only be offered if you provide Personal Information to Select Fireplaces Ltd. Consequently, if you choose not to provide us with any required Personal Information, Select Fireplaces Ltd. may not be able to offer you those services.

Select Fireplaces Ltd. collects only such information from individuals or organizations as is required for the purposes of providing services or information to them.

Select Fireplaces Ltd. does not sell, trade, barter or exchange for consideration any Personal Information it has obtained. Unless permitted by law, no Personal Information is collected about an individual without first obtaining the consent of the individual to the collection, use and dissemination of that information.

Personal Information will be collected, to the extent possible, directly from the individual concerned.

Unless in the context of providing legal or other services, Select Fireplaces Ltd. does not knowingly collect Personal Information from anyone under the age of 18 and does not use such information if it discovers that it has been provided by a minor.

Select Fireplaces Ltd. may disclose Personal Information to employees or to organizations that perform services on its behalf. Personal Information will only be provided to such employees or organizations if they agree to use such information solely for the purposes of providing services to Select Fireplaces Ltd. and under the instruction of Select Fireplaces Ltd. and, with respect to that information, to act in a manner consistent with the relevant principles articulated in this Policy.

Please note that there are circumstances where the use and/or disclosure of Personal Information may be justified or permitted or where Select Fireplaces Ltd. is obliged to disclose information without consent. Such circumstances may include:

- Where required by law or by order or requirement of a court, administrative agency or other government tribunal;
- Where Select Fireplaces Ltd. believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- Where it is necessary to establish or collect money owing to Select Fireplaces Ltd.;
- Where it is necessary to permit Select Fireplaces Ltd. to pursue available remedies or limit any damages that Select Fireplaces Ltd. may sustain; or
- Where the information is public.

Where obliged or permitted to disclose information without consent, Select Fireplaces Ltd. will not disclose more information than is required.

Accuracy

Select Fireplaces Ltd. endeavors to ensure that any Personal Information provided and in its possession is as accurate, current and complete as necessary for the purposes for which Select Fireplaces Ltd. uses that information.

Retention

Select Fireplaces Ltd. keeps Personal Information only as long as it is required for the reasons it was collected. The length of time information is retained varies, depending on the product or service and the nature of the information. This period may extend beyond the end of a person's relationship with us but it will only be for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date. When your Personal Information is no longer required for Select Fireplaces Ltd.'s purposes, we have procedures to destroy, delete, erase or convert it into anonymous form.

Security

Select Fireplaces Ltd. endeavors to maintain adequate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure or modification of Personal Information.

Select Fireplaces Ltd. further protects Personal Information by restricting access to it to those employees that the management of Select Fireplaces Ltd. has determined need to know that information in order that Select Fireplaces Ltd. may provide its services.

In terms of communicating Personal Information to Select Fireplaces Ltd. you may wish to note that there is no method of transmitting or storing data that is completely secure. While the physical characteristics of each are different, mail, telephone calls, faxes and transmissions over the Internet are all susceptible to possible loss, misrouting, interception and misuse of the information being communicated or transmitted.

As do many organizations, Select Fireplaces Ltd. attempts to strike a reasonable balance between security and convenience. In communicating with clients and others, Select Fireplaces Ltd. often requests the right to use a method of communication that is less secure than some of its less convenient alternatives. An example of this is email. At this time, when we use email, it may be sent as unencrypted plain text. We do this because Select Fireplaces Ltd. believes that many of our clients and others cannot readily process encrypted email. This is done for the convenience of our clients but has the security concern that, if misrouted or intercepted, it could be read more easily than encrypted email.

Select Fireplaces Ltd. Website

Select Fireplaces Ltd. provides clients and others with general access to its website. During the course of an individual's use of the Internet, he or she will learn of the common use of "cookies." "Cookies" are small amounts of information that are distributed from some websites to your web browser. Most Internet browsers are initially set to accept cookies. If you do not wish to accept cookies, you can set yours to refuse cookies or to alert you when cookies are being sent. Select Fireplaces Ltd. s website does not presently use cookies, clear GIFs or any type of "web bug."

Non-identifiable information is collected when someone browses our website. This information indicates a person's activity on the website, but we do not know that the person is you. This information includes:

- Access date and time;
- Internet domain (for example, "xcompany.com" if a private Internet access account is used) and IP address (an IP address is a number that is automatically assigned to a computer whenever someone is surfing the web);
- Type of browser, operating system and version used to access our website;
- Files viewed or downloaded; and

- Pages visited.

We use this non-identifiable information to improve our website (for example, we learn what type of information is of most interest to our visitors and how many visitors we receive).

Requests for Access to Personal Information

The law permits individuals to submit written requests to us to provide them with:

- their Personal Information under our custody or control;
- information about the purposes for which their Personal Information under our custody or control has been and is being used by us; and
- the names of persons to whom, and the circumstances in which, their Personal Information has been and is being disclosed by us.

Select Fireplaces Ltd. will respond to requests in the time allowed by the *Personal Information Protection Act* and will make reasonable efforts to assist applicants and to respond as accurately and completely as reasonably possible. All requests may be subject to any fees and disbursements the law permits us to charge.

An individual's ability to access his or her Personal Information under our control is not absolute. The law provides that we must not disclose Personal Information where:

- the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
- the disclosure would reveal personal information about another information; or
- the disclosure would reveal the identity of an individual who has in confidence provided us with an opinion about another individual and the individual providing the opinion does not consent to the disclosure of his or her identity.

The law further provides that we may choose not to disclose Personal Information where:

- the Personal Information is protected by any legal privilege;
- the disclosure of the information would reveal confidential commercial information and it is not unreasonable to withhold that information;
- the Personal Information was collected by us for an investigation or legal proceeding;
- the disclosure of the Personal Information might result in similar information no longer being provided to us when it is reasonable that it would be provided;
- the Personal Information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act
- under an agreement,
- under an enactment, or
- by a court; or
- the Personal Information relates to or may be used in the exercise of prosecutorial discretion.

The *Personal Information Protection Act* indicates that it is not to be applied so as to affect any legal privilege. We will not disclose information that is privileged where the applicant is not the client in whom the privilege is vested.

Requests for Correction of Personal Information

The law permits individuals to submit written requests to Select Fireplaces Ltd. to correct errors or omissions in their Personal Information that is in our custody or control. We will:

- correct the Personal Information and, if reasonable to do so, send correction notifications to any other organizations to whom we disclosed the incorrect information;
- decide not to correct the Personal Information but annotate the Personal Information that a correction was requested but not made.

Contacting or Communicating With Us

If you have any questions with respect to our policies concerning the handling of your Personal Information, or if you wish to request access to, or correction of, your personal information under our care and control, please contact:

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