

EMCO-Inortech, ULC Privacy Policy

Last Updated: September 21, 2023

Welcome to <https://emcoinortech.ca>. EMCO-Inortech, ULC (“EMCO”) appreciates your interest in this website and other affiliated or linked EMCO websites (collectively “Website”). We value your privacy and are serious about safeguarding it. This privacy policy (“Privacy Policy”) explains how we collect personal information you provide to us through our Website or any other type communication, describes the categories of personal information you may choose to provide to us, and the purposes for which we use that information.

This Privacy Policy will notify you of the following:

- your consent to our data collection and use practices;
- the intended audience for our website;
- cookie and tracking technology;
- the categories of information collected from you through the Website, how it is used, with whom it may be shared, how it is protected, and how long it is retained;
- your access to and control over your information; and
- how you can ask us questions about this Privacy Policy or exercise any applicable rights.

YOUR CONSENT

By accessing and using our Website or providing us with your information, you consent to the data collection and use practices described in this Privacy Policy. If you do not want us to collect or use your information as set out in this Privacy Policy, please refrain from using our Website or providing us with your information.

You may refuse to provide us with personal information or withdraw your consent if you have already provided us with information. However, you must give us reasonable notice of the withdrawal of your consent and send us your request in writing. We require at least 15 business days' notice. This may affect our ability to provide you with certain products or services.

INTENDED AUDIENCE

This Privacy Policy is addressed to anyone whose information we collect both online through our Website or offline (e.g., via the phone, and other correspondence), and includes visitors of our Website and recipients of electronic or other communications from us that reference this Privacy Policy. Our customers are businesses. Because we do not sell our products or services to individuals, we do not seek to collect or use personal information outside of a business relationship.

Please note that we do not seek to collect information about persons under the age of 18, and our Website is not intended for use by anyone under the age of 18. No one under the age of 18 should provide information to us on or through our Website. If we learn that we have received information from a person under the age of 18, we will delete that information. If you believe a person under the age of 18 has sent personal information to us, please contact us immediately and we will use reasonable efforts to promptly remove that information from our systems.

TRACKING TECHNOLOGY

We may use a variety of technologies that collect information automatically. For example, we use Google Analytics to help us understand how our customers interact with the Website. You can read more about how Google uses your information here: <https://policies.google.com/privacy>. You can also opt out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

WE DO NOT SELL YOUR INFORMATION

We are the sole owners of the information we collect through our Website, except your own personal data, for which you remain the owner. Please note that we do not sell or rent the information collected from you, our customers, or visitors to our Website.

CATEGORIES OF INFORMATION COLLECTED AND HOW WE SHARE IT

Our Website permits you to contact us or make certain requests for information concerning our products and services. We collect the personal information that you knowingly provide by completing an online form or by registering for information or services or that you otherwise send to us. For example, if you sign up to receive e-mail communications from one of our businesses, we collect your e-mail address and any related information you provide. If you communicate with us using the “Contact Us” feature, we collect the information you provide when you complete the “Contact Us” form. In addition to the foregoing, we may collect personal information from the following sources: your agent, our customers, service providers, affiliates, data analytics providers, and social media networks.

Here are some of the categories of personal information that you have the choice of providing to us:

- Name
- Company name
- Company address
- Email address
- Telephone number
- Facsimile number
- Financial account information
- Chemicals you are interested in receiving information about
- Comments you would like us to consider
- Employment applications

We may collect information automatically about you whenever you interact with the Website, which may include the browser name, the type of computer and technical information about your means of connection to our Website, such as the operating system and the Internet service providers utilized and other similar information. We may also collect information about your activities on the Website and how you use the Website. If you are visiting the Website via a mobile device, we may also collect your mobile device’s unique device ID and information about how you use the Website.

From time to time, we receive information about individuals from our third-party service providers, social media networks, affiliates, and partners. For example, we receive information on our email campaigns from our third-party service providers, including whether you have read an email sent by us or on our behalf, forwarded an email and when and how many times you have opened an email. We may also receive information from third-party analytics on the Site that allow us to improve our Site and services.

Your consent to the collection of your personal information from a third party will be sought, except to verify the accuracy of your information and other information about you, or to obtain information in your interest that cannot be obtained from you in a timely manner.

EMCO may share your information with EMCO affiliates for the purposes set forth in this Privacy Policy. However, your information is accessible only to our employees, representatives, agents or service providers who need your information to perform their duties and for the purposes set out in this Policy. Otherwise, we will ask for your consent.

We may, without your consent, communicate your information to a third party when the information is necessary for the performance of a mandate or service contract that we have entrusted to them. This is the case with our suppliers. In this case, you should know that we entered into written agreements with all our agents and service providers to ensure that they take all possible steps to preserve the security and confidentiality of your information, that they comply with our Policy, that their rights to use your information are limited to necessary purposes, and that your information is deleted as soon as it is no longer required. Our Privacy Officer is responsible for ensuring compliance with these agreements.

We have business relationships with other companies and persons (a.k.a., service providers) to perform business functions on our behalf. They may be provided with access to personal information needed to perform these business functions, but they may not use such information for other purposes. We may also share your information with third parties, without your consent, for business transactions, acquisitions or transfers, compliance with laws, rules and regulations, the protection of our rights and the rights of others, to prevent or investigate a possible crime, or to enforce or apply any of our agreements. We will also share information with others when you direct us to.

Other than as described herein, we do not share your personal information to third parties. The below chart lists the categories of personal information that we may collect and have collected in the past 12 months and how we share such information.

Categories of Personal Information	Categories of Services Providers and Third Parties with whom Personal Information is Shared
<p>Identity Data. This may include first name, last name, title or other similar identifiers.</p>	<p>Entities that we are required to share with pursuant to law or for legal proceedings; service providers; our affiliates; data analytics providers; prospective purchasers of our business; and outside auditors, insurers and lawyers.</p>
<p>Contact Data. This may include billing addresses, email address, telephone numbers and other contact information.</p>	<p>Entities that we are required to share with pursuant to law or for legal proceedings; service providers; our affiliates; prospective purchasers of our business; and outside auditors, insurers and lawyers.</p>
<p>Technical Data. This may include information on your interaction with our Site, internet protocol (IP) address, geolocation data, browser type and version, mobile device type and operating system, unique mobile device identifier, time zone setting and location, browser plug-in types and versions and operating system and platform.</p>	<p>Service providers; our affiliates; data analytics providers; and prospective purchasers of our business.</p>
<p>Inferences we draw about you. This may include information about your preferences, characteristics, predispositions, behavior or other trends that help us identify which products you may be interested in.</p>	<p>Entities that we are required to share with pursuant to law or for legal proceedings; service providers; data analytics providers; our affiliates; and prospective purchasers of our business.</p>

<p>Employment application information. This may include your resume, work history, education, cover letter, drug screening information and background check information.</p>	<p>Entities that we are required to share with pursuant to law or for legal proceedings; service providers; our affiliates; prospective purchasers of our business; and outside insurers and lawyers.</p>
<p>Other information you submit to us. This may include requests or communications you submit to us, including emails, ratings or customer service call recordings.</p>	<p>Entities that we are required to share with pursuant to law or for legal proceedings; service providers; our affiliates; data analytics providers; prospective purchasers of our business; and outside auditors, insurers and lawyers.</p>

USING YOUR INFORMATION

We may use the personal information you provide through our Website for any legitimate and lawful business purpose, including but not limited to the following:

- to provide products, information and services you request;
- to provide you with customer service or technical support;
- to contact you with updated information about our products;
- to improve our marketing and promotional efforts;
- to process a job application;
- to personalize user experience and improve our Website;
- for security or fraud prevention purposes;
- to comply with our legal obligations; and
- for any other purpose identified in an applicable privacy statement or other agreement you may have with EMCO.

Unless you ask us not to, we may use your information in the future to contact you via e-mail to inform you of specials, new products or services, or changes to this Privacy Policy.

We will only use or disclose your personal information for the purposes for which it was collected, as set out above in this Policy.

That said, we may use your information for other purposes without your consent in the following cases:

- For purposes consistent with those already disclosed
- For purposes that are clearly for your benefit
- For fraud prevention and detection purposes
- To improve our security protection measures
- Where necessary to ensure that we provide you with a product or service you have requested
- For study, research or statistical purposes, insofar as the information is submitted in such a way that you cannot be directly identified.

RETENTION PERIODS.

We will retain personal information as long as necessary for the identified purposes, even if you cease to have a relationship with us. A retention schedule is available upon request. We retain information used to make a decision about you for a minimum of one year from the date of that decision. Upon request, you have the right to be informed of the information we hold, the categories of people who have access to your information within our company and the length of time we keep the information.

Our retention periods for personal information are based on business needs and legal requirements. We will retain your personal information for as long as is reasonably necessary (i) for the processing purpose(s) for which it was collected or (ii) for any other permitted, linked purpose; or as otherwise permitted or required by law depending on jurisdiction. Where personal information, including sensitive personal information, is no longer needed, we either irreversibly anonymize the data (in which case we may further retain and use the anonymized data) or destroy the data.

THE PROTECTION OF YOUR INFORMATION

EMCO ensures the physical, organizational and electronic security of your personal information. We make sure to use the best means to ensure the protection of each piece of information we hold on an individual basis, taking into account its sensitivity, purpose, use, quantity, distribution and medium. Methods we may use include, but are not limited to, physical barriers, keys, encryption, access controls, multi-factor authentication, and virtual private networks.

For Quebec residents:

A privacy incident includes any unauthorized access, use or disclosure of your personal information, as well as loss or damage to your information. In the event of a privacy incident involving your personal information, we undertake to take all reasonable steps to minimize the risks and repercussions and to prevent any further such incidents. In the event of an incident that presents a serious risk, we will notify you, where possible, and the *Commission d'accès à l'information*. We also keep a register of confidentiality incidents, which is constantly updated and retained for a period of five years after each incident.

KEEPING YOUR INFORMATION ACCURATE

You must advise us of any changes to your information so that we may update your records. You may challenge the accuracy and completeness of your personal information and we will make such changes as we consider appropriate. In the event of inaccurate, incomplete or equivocal information, you have the right to have the information corrected or to have the outdated or unjustified information deleted for our purposes without charge. Any request for rectification must be made in writing by a person entitled to do so by law. We will respond to your request within 30 days. If the information has been provided to third parties within the six months prior to the correction, we will forward any corrected information to them. We will send you a copy of the corrected information free of charge.

YOUR ACCESS TO YOUR INFORMATION AND OTHER RIGHTS

You may have certain rights relating to your personal information, including your sensitive personal information, subject to local data protection laws. Depending on the applicable laws and under certain conditions, you may have the right to:

- request the categories of information you have provided to us, our business or commercial purpose for collecting that personal information, the categories of third parties with whom we share that personal information, or the specific pieces of personal information we collected about you, if any;
- request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes;
- change and/or correct any information we have about you;
- request that we delete any information we have about you; and/or
- not be discriminated against for exercising any of your rights.

Should you choose, you may contact us in order to express any concerns that you may have about our collection and/or use of your information.

We may deny requests as permitted by law.

For a Quebec resident:

At your request, we will tell you what personal information we hold, what it is used for, from whom it was collected and to whom it has been disclosed. We will also provide you or a third party you design, with electronic access to your personal information upon request, except in certain situations. Any request for access must be made in writing by a person entitled to do so under the law. We will respond within 30 days. If you wish to obtain a copy or transcript of your information, we will provide it within a reasonable time and at a reasonable cost. Should we deny your request, we will provide you with a written explanation. We will not provide personal information if :

- it contains references to a third party and disclosure would be likely to harm that third party, except with its consent;
- it is subject to solicitor-client or litigation privilege;
- it cannot be disclosed for legal reasons;
- it would cause serious harm to your health
- it would interfere with an investigation
- it would affect legal proceedings in which you or we have an interest.

COMMUNICATIONS RELATED REQUESTS AND EXERCISING YOUR RIGHTS

You may request that we stop sending communications to you at any time by contacting us through the methods below. Please keep in mind that our business relationship may require us to send you limited communications even after a request is made. To the extent we are able to comply with your request, or as may be required by law, we will honor it.

To exercise your rights described above, please submit a verifiable request to us by either:

- Calling us at 262-427-0400 or 1-800-TAP-EMCO and asking to speak to a member of the legal department; or
- Emailing us at privacy@emcochem.com.

Only you, or a person or entity that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. If you are making a request on behalf of another person, you must provide written legal documentation that you are authorized to act on behalf of that individual.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We may not be able to fulfill your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. To verify your identity, we may request up to up to three pieces of personal information about you, and we reserve the right to take additional steps as necessary to verify your identity if we have reason to believe a request is fraudulent.

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the date we receive your verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

LINKS TO OTHER WEBSITES.

While you are using our Website, you may be linked or directed to other third-party websites that are beyond our control. Each of these third parties may have a privacy policy different from ours. We are not responsible for any actions or policies of such third parties. You should review the applicable privacy policies of these third-party websites before providing personal information to those third parties.

CHANGES TO THIS PRIVACY POLICY

From time to time, EMCO may update this Privacy Policy and related business practices. When we do, we will revise the effective date at the top of the Privacy Policy. We reserve the right to do so at any time and without prior notice. Your use of our Website after such changes have been posted constitutes your agreement to such changes. We encourage you to review our Privacy Policy regularly for updates.

CONTACT US

If you have any questions about this Privacy Policy, please contact us at privacy@emcochem.com.

If you have any concerns or questions that you feel are not addressed by this Policy, please contact EMCO's Privacy Officer at the address below:

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