

# COMOLDCO CORPORATION

Quality Compression Molding



## PRIVACY POLICY

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### Overview:

Comoldco Corporation (the Company) is committed to protecting the privacy of its employees, our customers and their employees. As part of this commitment, the Company has established a privacy program that demonstrates our due diligence to privacy laws.

### Scope:

The Company has developed a Privacy Policy and Personal Information Procedures to clearly define our ongoing commitment to protecting privacy rights with respect to the collection, use, sharing and securing of personal information processed by the Company.

### Definitions:

Customer: A company who has entered into a business relationship with the Company for the Company to provide goods or services.

Individual: The person whose data the Company has processed, for example, an employee of the Company, an employee of a customer, or a person using the Company website, service or tool.

Personal Information: Any data element or combination of data elements that enables the identification of an individual, including but not limited to: home address, personal telephone or mobile phone number, personal email address, human resources data, personal health information, government identification such as social insurance number, driver's license number, credit card number, and banking information. It does NOT include Company generated Employee ID#, name, job title, business address, business telephone or fax number and business email address.

Processed: personal information that is in the Company's possession or under its control.

### Accountability:

The Company is accountable for all personal information in our possession or control. This includes any personal information we receive directly (for example from customers and employees) as well as individual's personal information that we may receive indirectly.

The Company has appointed a Privacy Officer to oversee privacy issues on its behalf. The Company educates employees who hold positions that require them to deal with employee or customer personal information, about our Privacy Policy and Procedures, and their role in protecting privacy of personal information.

### **Informed Consent:**

The Company will not collect, use or disclose personal information without informed consent. Collection may occur without knowledge or consent as permitted by law, including collection in the course of a legal investigation.

#### *Customer Information and Consent*

In most cases, the Company will collect, use or disclose personal information about customers only for the purpose of providing goods and/or services. Customer personal information may also be disclosed internally for the purpose of fulfilling contractual/purchase order agreements and/or quality reviews. Customer personal information may also be shared internally in order to allow us to offer services or products that may be of interest to customers.

#### *How we inform our customers about our Privacy Policy and obtain their consent:*

-All new customers shall be required to complete a Customer Credit Application Form in order for the Company to establish credit for their account. The Customer Credit Application Form contains a clause outlining terms and conditions and states that the Company Privacy Policy is available for viewing on the Company's website and that by signing the Customer Credit Application Form they authorize the Company to collect and share the personal information provided on the form in accordance with the Privacy Policy.

-Existing customers shall be advised by either mail, fax or email communication that the Company has posted its Privacy Policy on its website and they can view or print it from the website.

#### *Employee Information and Consent*

The Company collects personal information about our employees in order to pay them. Comply with laws, provide them with benefits, administer performance tools, to improve on and manage programs, policies and employee relations and generally to establish, manage or terminate the employment relationship and other human resources-related services. The Company may also use employee information in the course of investigating, negotiating or completing a sale, financing or other business transactions involving all or any part of the Company's business. The Company also collects personal information from individuals seeking employment with the Company.

When the Company collects personal information, it will inform the employee of the reasons why the information is required, what use will be made of it and with whom it may be shared. Collection may occur without knowledge or consent as permitted by law, including collection in the course of an investigation.

At orientation, a new employee will be advised that the Company requires his/her personal information for human resources-related services and will be providing that personal information to 3<sup>rd</sup> party providers such as the payroll services provider; our Banking services provider; government and insurance providers, etc. The employee will then be required to complete, date and sign a 'Personal Information – Express Consent Form' wherein he/she may choose to consent or not consent to specific information sharing.

Existing employees, who have not already done so, will be advised that:  
-he/she can review the Company Privacy Policy posted in the facility or on the Company website  
-why and with whom the Company will be sharing this personal information  
The employee will then be required to complete, date and sign a 'Personal Information – Express Consent Form' wherein he/she may choose to consent or not consent to specific information sharing.

Should an employee or candidate for employment choose not to provide the Company with permission to collect, use or disclose personal information or choose to withdraw permission to collect, use or disclose personal information, the Company may not be able to employ him/her; continue to employ him/her; or to provide him/her with services and benefits.

#### *How employees are informed about the Company Privacy Policy and Procedures:*

The Company trains its employees with respect to its privacy policies and practices.

All employees shall be educated on the Company's Privacy Policy during their Orientation training. At the time of hiring and during the 'New Employee Orientation', all new employees should be advised that a copy of the Company's Privacy Policy is posted in the facility and available on the Company website, and that they familiarize themselves with it. Following which, if they have any questions or concerns about how their personal information is/will be handled, they should feel free to discuss them with the Company's Privacy Officer.

Any new employee whose job description requires him/her to deal with personal information and related privacy procedures shall be trained on the Company's privacy procedures during their 3 month probationary period. They will be advised to prepare for a written 'test' which will be administered when they have completed their 3 months probationary period.

### **Collection and Use:**

The Company does not collect data indiscriminately. The Company collects personal information only for the purposes of providing and promoting the services we offer and limits use to those purposes, including initiating, maintaining, enhancing and terminating the employee-employer relationship. Personal information shall be collected by fair and lawful means, and not by misleading or deceiving individuals about the purpose for which information is collected.

The Company may also collect personal information from other sources, either with the consent of the individual or where permitted or required by law. Examples of indirect sources of personal information include background checks, former employers or personal references.

### **Safeguards:**

The Company has implemented policies, procedures and practices to protect personal information. The Company protects personal information with physically secure facilities, limited access, industry standard security tools and practices and clearly defined internal policies and practices.

### **Right to Know:**

Customers and employees have the right to review and obtain a copy of his/her personal information that the Company has on record, what it is being used for, and to whom and why it has been disclosed, by submitting a written request to the Company's Privacy Officer.

Government issued Photo Identification must be provided along with the request, together with written document detailing the reason(s) why access is being requested. The Privacy Officer will then determine whether or not the individual, employee, customer or 3<sup>rd</sup> party will be granted the right to access said personal information. Personal information may only be viewed by duly authorized and appropriately identified individuals, in the Company office and within supervised view of the Privacy Officer.

### **Challenging the Company's Compliance**

Individuals may challenge the Company's compliance or failure to comply with this Privacy Policy by forwarding their concerns in writing to the Company's Privacy Officer:

Privacy Officer  
Comoldco Corporation  
137 Arrow Road  
Guelph, ON N1K 1S8  
Phone: (519) 224-3706

The Privacy Officer will ensure that a complete investigation of all complaints has been undertaken and will report his/her findings to the individual, in most instances within 30 days of receipt of the complaint. The Company will take all appropriate actions to remedy any such issues. If the matter cannot be settled, the Company agrees to cooperate with the dispute resolution system set forth below.

If individuals feel that their complaint was not satisfied, they may file a formal complaint, free of charge, with the regulatory body below:

Office of the Privacy Commissioner of Canada  
30 Victoria Street  
Gatineau, Quebec  
K1A 1H3  
Phone: 1-800-232-1376

Or  
Office of the Privacy Commissioner of Ontario  
2 Bloor Street East, Suite # 1400  
Toronto, Ontario  
M4W 1A8  
Phone: (416) 326-3333

### **Changes to this Policy**

The Company may update this policy to reflect changes to our practices and reserves the right to change its policies and procedures at its own discretion without notice.