



Privacy Principles

Howell Plumbing Supplies Dasco Limited and Privacy of Individual Information

Howell Plumbing Supplies Dasco Limited and all its affiliated companies (“We” or “Howell”) are committed to maintaining the privacy of personal information, by complying with the Personal Information Protection and Electronic Documents Act (“PIPEDA”).

Personal Information, for the purpose of these *Privacy Principles*, means information that identifies an individual, including employee records and customer information. Personal Information includes but is not limited to: an individual’s date of birth, age, health information, home address and financial information which we collect for the purposes of providing you with products, services, employment and/or benefits. Personal information does not include any information that is available via public record sources, your name, business title, and business related addresses, emails, phone or fax numbers.

These *Privacy Principles* may be modified from time to time.

1. Accountability

We are responsible for the privacy of the personal information of individuals that we have under our control, as well as the information that we may transfer to third parties for processing.

We have designated the Vice President, Finance and Administration of Howell as our Privacy Officer to be accountable for Howell’s compliance with PIPEDA. All of our employees are responsible with individually complying with PIPEDA and with these *Privacy Principles*.

2. Purpose

We identify and document what personal information we collect, whereby such collected information is only used for the purposes for which it was intended. If we intend to use personal information for reasons other than those originally intended, we will obtain the individual’s consent prior to using it.

Whenever practical we collect, use and disclose personal information obtained directly from the individual concerned, as necessary in administering business activities, such as in the following situations and/or for the following purposes:

- a. To enable Howell and associated third party entities to administer pay;
- b. To enable Howell and associated third party entities in the administration of employee benefits;
- c. To enable Howell via third party entities to provide insurance where required;
- d. To obtain and provide information to various reporting agencies;
- e. To enable Howell to provide you with goods and/or services;
- f. From you on your applications, through interviews, via our customer service teams;
- g. From your transactions with us;
- h. As required by various government bodies, in accordance with various Federal and Provincial legislation, and in accordance with other legal requirements.

Please refer to *Section 11 – Contacting the Privacy Officer for Howell*, for information regarding questions or inquiries relating to the *Purposes* as outlined in this *Section*.



3. Consent

We obtain consent regarding the collection, use and disclosure of personal information either at the time of, or prior to the information being collected, used and/or disclosed, except in certain circumstances where collection, use or disclosure is a legal requirement. We additionally indicate the purpose for which the personal information is being collected, used and/or disclosed, wherever possible.

Consent may be either implied or explicit, and provided electronically, in writing, or verbally, depending upon the sensitivity of the information, and the circumstances surrounding the collection, use or disclosure of the information. Your receipt of these *Privacy Principles* will constitute consent unless you declare in writing that you do not agree with the terms of these *Privacy Principles* and wish to opt out of specified portions. Written consent is also obtained through our credit application and employment offer processes.

Consent regarding the collection, use and/or disclosure of personal information may be declined or revoked at any time, where applicable; however, the specific entitlements, benefits and/or coverage bound by the consent may be limited or terminated.

Please refer to *Section 11 – Contacting the Privacy Officer for Howell* for information on how to decline or revoke your consent regarding the use of your personal information.

4. Limiting Collection

We will only collect, use and/or disclose personal information that is required for the administration of business activities as outlined in *Section 2 – Purpose*. We will not, and do not sell customer or employee information. Neither Howell, nor any employee of Howell will deceive or mislead an individual about the reasons for collecting personal information.

5. Limited Use, Disclosure and Retention

We use personal information in accordance with the consent provided by the individual to whom the information relates, in accordance with these *Privacy Principles*, our contractual obligations and the law. Personal information will not be used by Howell employees or associated third party entities for purposes other than those required in the performance of their required contractual duties.

We enlist the assistance and expertise of external third parties to perform various functions on Howell's behalf. In such situations, personal information may be disclosed to third party entities in order to administer the outsourced function. We obligate that these affiliated third parties use and take steps to protect personal information in accordance with the law and the requirements of these *Privacy Principles*.

We retain personal information only for as long as it is necessary to fulfill the purpose(s) for which it has been collected, or as long as specified by various legal, contractual and/or legislated obligations. Where personal information is no longer required, it is destroyed, erased or made otherwise anonymous. There may be some information that is maintained on-file indefinitely, due to the nature of the information.



6. Accuracy

We attempt to ensure that the information that is collected, used and/or disclosed, is accurate, up-to-date, factual and as complete as possible. However, Howell relies on each individual to disclose all relevant material information to us, and inform us of any changes as expeditiously as possible. You may, with proof of entitlement, request access to, and if necessary, request a change to the personal information we have in our possession by following the appropriate procedure. Please refer to *Section 11 – Contacting the Privacy Office for Howell* for information on requesting access and changes to personal information.

7. Safeguards

Appropriate organizational, technological and physical safeguards are in place to prevent loss, theft, unauthorized access, disclosure, copying, use and/or modification of personal information. This protection is provided by restricted access to offices, locking cabinets, electronic firewalls, secure internet sites, electronic passwords and personal identification numbers. Only authorized Howell employees, third party consultants, insurers, and administrators with a legitimate business requirement for access to personal information will be provided with limited access. Employees with access to personal information will be made aware of the importance of confidentiality.

8. Openness

We will readily make available the information about our *Privacy Principles*, associated guidelines and management of personal information for all employees and customers. These *Privacy Principles* will be posted, and updated versions made available; both in print upon written request, and electronically on the Howell web site at www.howellpipe.com.

9. Access

If you have the right of access, you or a person authorized in writing to act on your behalf may, providing satisfactory identification and proof of entitlement, request access to, or make a correction to your personal information, which Howell has in its possession. The right to access is not absolute, and we may decline your request to access if you do not have a legitimate or authorized right to access the information.

10. Challenging Compliance

A customer or employee will be able to address a challenge concerning compliance with these *Privacy Principles* to the Privacy Officer for Howell. We will review all inquiries and complaints about our policies and procedures relating to the handling of personal information. Appropriate measures will be taken by Howell should an inquiry or complaint be investigated and be deemed justified.

11. Contacting the Privacy Officer for Howell

Contact: Vice President, Finance and Administration
Howell Plumbing Supplies Dasco Limited
11 Armstrong Avenue
Georgetown, Ontario, Canada L7G 4S1

Phone: (905) 702-5742
E-mail: privacyofficer@howellpipe.com



Should you have:

- Questions about our privacy practices;
- A request to access or correct your personal information; or
- Should you wish to decline or revoke your consent to the use, collection or disclosure of your personal information.

Appendix A

Type of Personal Information Collected	Use / Reason for Collection (Department)
Social Insurance Number	Government Employment Requirement (HR)
Birth Dates	Administration of Insurance & Benefits (HR)
Dependent Information	Administration of Insurance & Benefits (HR)
Banking Information	Direct Deposit of Earnings (HR) Establishing Credit (A/R)
Beneficiary Information	Administration of Insurance & Benefits (HR)
Home Addresses & Phone Numbers	Emergency work related inquiries (via direct manager only) outside of normal hours (HR & Mgrs)
Credit / Financial Information	To establish Credit Worthiness & to share Credit Information with associated Credit Bodies (A/R) Payment for Products and/or Services (A/R)
Personal Guarantees	Credit Security (A/R)