

PRIVACY POLICY

Last Updated: December 6, 2023



This Privacy Policy outlines the privacy practices of Regent Supply, concerning the collection, use, retention, disclosure, and security of personal information obtained with respect to its customers, including credit applications, applications for employment, and other individuals (sometimes hereinafter referred to as “you” or “your”) in connection with our business. It has been developed to comply with Canada's private sector privacy laws, including the Personal Information Protection and Electronic Documents Act (PIPEDA), the Personal Information Protection Act (Alberta), the Personal Information Protection Act (British Columbia), and an Act respecting the protection of personal information in the private sector (Québec).

Protecting privacy is important, and Regent Supply is committed to keeping the personal information that it obtains secure and confidential. Regent Supply generally uses personal information to provide customers with the products and services that they have requested, but also to get to know you, your specific needs and preferences, in order to provide you with world class service and support.

Personal Information We Collect

In order to conduct certain aspects of our business, including processing your requests for our products or services, we may be required to collect personal information about you. In this policy, the term 'personal information' means any information about an identifiable individual, but does not include the name, title, or business contact information of an employee of an organization, when collected, used or disclosed for the purpose of communications relating to the employees' employment, business or profession.

Accordingly, when used in this Privacy Policy, references to personal information include, but are not limited to:

- non-excluded identifying information regarding an individual in his or her capacity as an employee of an organization and the name, address, telephone number, e-mail address and other contact information of an individual outside of his or her role as an employee of an organization;
- information we collect or generate in order to comply with applicable legal and regulatory requirements, including information about an individual's business or occupation;
- social insurance number and / or other personal identifiers, such as date of birth, collected for credit checks;
- individual credit reports and credit history, asset and liability information; • information about an individual's past dealings and accounts with Regent Supply, including payment history or reports of suspicious transactions; • information about past financial dealings with third party references provided to us;
- account information and records collected and retained over the course of an individual's relationship with us; and
- such other personal information collected with an individual's consent, or as permitted or required by law.

Please note that you are never required to provide us with your social insurance number; however, to accurately process a credit application received from you, we require a social insurance number, date of birth, or driver's license number.

Regent Supply and its representatives may collect personal information in several circumstances in connection with our business and we may collect or receive personal information through several other sources, including:

- when you request a quote, order, purchase, return, or exchange any of our products or services;
- when you submit a credit application, whether personally or on behalf of a corporate credit application, including in the capacity as a guarantor of the obligations of a corporate customer;
- when you correspond with us, including electronically, to contact one of our representatives, provide us with feedback, or participate in promotions which we may make available;
- when we receive corporate information from existing or prospective customers to evaluate potential business relationships;
- when we access publicly available registries and databases to learn more about existing and potential customers;
- from credit reporting agencies and current and past creditors;
- from third-party financial institutions and similar references, as provided in connection with a credit evaluation;
- through our research on industry sectors and other areas relevant to our business; • from our affiliates with whom you may have had past dealings;
- when you visit or use the Regent Supply website, which may involve the collection of: (a) visitor data provided voluntarily by site users; (b) site data that is collected automatically by our systems to provide us with information about site use, for research analysis purposes;
- when you apply for employment with Regent Supply; and • other ongoing transactions or interactions with Regent Supply.

Personal information will be used only for those purposes to which the affected individual has consented, subject to certain exceptions detailed below, as permitted or required by applicable privacy laws.

Regent Supply may use personal information, with the affected individual's consent, in connection with credit decision-making, account opening processes and the ongoing administration of our business relationships, including for such purposes as:

- identifying our customers, including the identities of directors, officers and guarantors of corporate customers;
- developing and maintaining our relationship with you, including with respect to the promotion or offering of additional products and services that might benefit or be of interest to you, processing orders, providing ongoing service and arranging delivery of products or services;
- renewing individual and corporate credit applications in furtherance of our credit approval process, including to make a determination of credit worthiness and whether to extend credit in response to credit requests;
- to obtain and exchange credit information from and with credit reporting agencies, credit references and other sources with whom you have or may expect to have financial dealings;
- monitoring, detecting and preventing fraudulent and suspicious transactions, including meeting risk management and fraud monitoring requirements;
- checking an individual's past dealings or accounts with us, or our affiliates;
- otherwise meeting legal and regulatory requirements;
- enforcing accounts and collecting any amounts owing to us;
- in connection with audit requirements;
- maintaining business records for reasonable periods to meet reasonable business needs and in accordance with legal and regulatory records retention requirements;
- evaluating an application for employment;
- generally managing and administering our business; and
- as otherwise consented to by an individual consent or as permitted or required by law.

In some circumstances, Regent Supply may use and disclose personal information without the affected individual's consent, including where:

- we have reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law, and the information is used for that investigation;
- an emergency exists that threatens an individual's life, health or security;
- the information is for statistical study or research;
- the information is publicly available, as defined in applicable privacy laws;
- the use is clearly in the affected individual's interest, and consent is not available in a timely way;
- knowledge and consent would compromise the availability or accuracy of the information, which is relevant to the detection, suppression or prevention of fraud, the investigation of a breach of an agreement or contravention of the law; or
- collection is required to investigate a breach of an agreement.

DISCLOSURE AND TRANSFER OF PERSONAL INFORMATION



Personal information will be accessible by those Regent Supply employees, officers and directors who need to know the information for the purposes of their work, including as identified below.

We may otherwise disclose personal information as set out below, with the affected individual's consent or as permitted or required by law.

- **Services and Transactions:** We may disclose personal information as necessary in connection with the transactions, products, and services you have requested, including to third-party suppliers in respect of the product warranties offered to you;
- **Disclosure within the Regent Supply family:** Certain personal information about individual representatives of our corporate customers (including officers, directors, shareholders, owners, principals, and guarantors) may be disclosed to our affiliates for the purposes of our and their ongoing risk management, fraud detection, and security requirements, as well as for identifying, financial and related background verification in connection with the provision of products and services.
- **Service Providers:** We may use agents and service providers (including computer technology and financial service providers such as credit card issuers, credit reporting agencies, and those of our affiliates acting in such capacities) to collect, use, store, and/or process personal information on our behalf, and personal information may be transferred to those entities for the purposes described in this Privacy Policy.
- **Business Transactions:** Personal information may be used by Regent Supply and disclosed to parties connected with certain business transactions, such as the proposed or actual financing, insuring sale, or amalgamation of all or part of Regent Supply or our business or assets, and to evaluate and/or performing a proposed transaction. These purposes may include permitting parties such as lenders, insurers or purchasers to determine whether to proceed or continue with a proposed transaction; fulfilling reporting, inspection or audit obligations to those parties; and disclosing personal information as part of conducting a purchase or sale. Assignees or successors of Regent Supply or our business or assets, or those of our affiliated entities, may use and disclose personal information for the purposes described in this Privacy Policy, unless further consent is obtained.
- **Internal Processes:** We may disclose personal information as reasonably necessary to meet insurance, audit, processing and regulatory requirements.

Personal information disclosed to third parties will be protected by a confidentiality, nondisclosure or other similar agreement requiring appropriate privacy protection.

PIPEDA permits Regent Supply to disclose personal information to third parties, without the affected individual's knowledge and consent, to:

- a lawyer representing Regent Supply;
- collect a debt owed to Regent Supply by the affected individual or customer with respect to whom the affected individual's personal information was collected;
- comply with a subpoena, a warrant, or an order made by a court or other body with appropriate jurisdiction;
- a law enforcement agency in the process of a civil or criminal investigation; or
- a government agency or department requesting the information.

PIPEDA also permits Regent Supply to transfer personal information to a third party without the affected individual's knowledge or consent if the transfer is simply for processing purposes and the third party only uses the information for the purposes for which it was transferred.

Regent Supply will ensure, by contractual or other means, that third parties to whom personal information is disclosed or transferred, protect the personal information in accordance with this Privacy Policy, and use it only for the purposes for which it was disclosed or transferred. Your personal information will never be traded, rented, or sold to any third party without your consent.

Disclosure and Transfers Outside of Canada

Some of the third parties to whom we may disclose or transfer personal information, including our affiliates, may be located outside of Canada.

Accordingly, any personal information which is disclosed, transferred, stored or processed outside of Canada may be subject to legal requirements in foreign countries, applicable to Regent Supply or the third parties, including the laws of the United States.

CONSENT



Where required, an individual's express, written consent will be obtained before or at the time of collecting personal information and the purposes for the collection, use or disclosure of the personal information will be provided to the individual at the time of seeking his or her consent. Once consent is obtained from the individual to use his or her information for those purposes, Regent Supply has the implied consent of the affected individual to collect or receive any supplementary information that is necessary to fulfill the same purposes. Express consent will also be obtained if, or when, a new use is identified.

By signing a credit application and/or other form, implied consent is granted by the individual to obtain and/or verify information from third parties such as banks, credit bureaus, and other lenders in the process of assessing the creditworthiness of an individual or corporate customer on whose behalf the individual's personal information is collected.

An individual can choose not to provide some or all of the personal information at any time, but if Regent Supply is unable to collect sufficient information to proceed with the approval of a credit request, such request may be delayed or turned down.

A customer or an individual can withdraw consent to the use of his or her personal information at any time by making such a request in writing to Regent Supply, at the address detailed below in this policy.

This Privacy Policy does not cover statistical data from which the identity of individuals cannot be determined. Regent Supply retains the right to use and disclose statistical data as it determines appropriate.

Retention of Personal Information

Personal information will be retained in customer files for as long as the file is active and for such periods of time as may be required for reasonable business purposes and as prescribed by applicable laws and regulations.

For example, a credit file will be deemed inactive if an application for credit is rejected, when financial obligations are repaid in full, or when a guarantee is terminated. Information contained in an inactive file will be retained for a period of seven (7) years, except in the case where an application is rejected; in which case the personal information contained in the file will be retained for a period of up to two (2) years.

Regent Supply endeavours in good faith to ensure that any personal information provided by the individual in his or her active file(s) is accurate, current and complete as is necessary to fulfill the purposes for which the information has been collected, used, retained and disclosed. Individuals are requested to notify Regent Supply of any change in personal or business information collected by Regent Supply. Information contained in inactive files is not updated.

Safeguards

Regent Supply will use physical, organizational, and technological measures to safeguard personal information to only those Regent Supply employees or third parties who need to know this information for the purposes set out in this Privacy Policy. This includes limiting access to these employees who need to know such information (for example, those who have to make a determination as to a customer's eligibility for credit); storing files in filing cabinets when not in use, and restricting access to work areas where active files may be in use; shredding files prior to disposal to prevent inadvertent disclosure to unauthorized persons; restricting access to Regent Supply computers and networks that contain personal information in electronic databases, or other formats, through password protection and internal Regent Supply security policies, and implementing technical security measures, such as limited access data-centers, intrusion detection, firewall technology, and secure socket layer certificate authentication.

Questions, Requests for Access, and Complaints

Any questions regarding this or any Privacy Policy of Regent Supply may be directed to the Chief Privacy Officer. Requests for access to information or complaints must be made in writing, and sent to the Chief Privacy Officer at the address below:

c/o Regent Supply
Attn: Chief Privacy Officer
4523 97 Street
Edmonton, AB T6E 5Y8

Requests for access will be fulfilled within 30 days and individuals will be informed of the existence, use and disclosure of their personal information. If upon receiving access, you find that the information held by Regent Supply is inaccurate or incomplete, upon providing documentary evidence to verify the correct information, Regent Supply will promptly make the required changes to the personal information retained by it; provided, however, that you may be asked to provide identification and / or other proof acceptable to Regent Supply to verify such inaccuracies or changes.

If an individual has a concern about the personal information handling practices of Regent Supply, a complaint, in writing, may be directed to the Regent Supply Chief Privacy Officer. Upon verification of the individual's identity, the Regent Supply Chief Privacy Officer will act promptly to investigate the complaint and respond to the individual within 60 days.

Where the Regent Supply Chief Privacy Officer determines that the individual's complaint is well founded, the Regent Supply Chief Privacy Officer will take the necessary steps to correct the offending information handling practice and/or revise the privacy policies and procedures of Regent Supply. Where the Regent Supply Chief Privacy Officer determines that an individual's complaint is not well founded, the individual will be notified in writing of such determination.

If the individual is dissatisfied with the finding of and corresponding action taken by the Regent Supply Chief Privacy Officer, the individual may bring forward a complaint to the appropriate Privacy Commissioner for their jurisdiction at the address below:

Office of the Privacy Commissioner of Canada

www.priv.gc.ca
30 Victoria Street Gatineau, QC K1A 1H3
Telephone: 1-800-282-1376
Fax: (819) 994-5424

Office of the Information and Privacy Commissioner for Alberta

www.oipc.ab.ca
#410, 9925 - 109 Street NW, Edmonton, AB T5K 2J8
Telephone: (780) 422-6860
Toll-Free: (888) 878-4044
Fax: (780) 422-5682
generalinfo@oipc.ab.ca

Office of the Information and Privacy Commissioner for British Columbia

www.oipc.bc.ca
PO Box 9038 Stn. Prov. Govt., Victoria, BC V8W 9A4
Telephone: (250) 387-5629
Fax: (250) 387-1696
info@oipc.bc.ca

la Commission d'accès à l'information du Québec

www.cai.gouv.qc.ca Bureau 2.36 525, boul. René-Lévesque Est, Québec, QC G1R 5S9
Telephone: 418 528-7741
Toll-free: 1 (888) 528-7741
Fax: 418 529-3102
cai.communications@cai.gouv.qc.ca

AMENDMENTS TO PRIVACY POLICY



This Privacy Policy is subject to amendment in response to developments in any applicable privacy legislation and the Chief Privacy Officer will review and revise this Privacy Policy from time to time as required by such changes in privacy laws. Notification of any changes in the Privacy Policy will be posted on the website of Regent Supply. Any changes in this Privacy Policy will apply to personal information collected from the date of the posting of such revised Privacy Policy.