

## Privacy Statement and Commitment

Protecting the privacy and confidentiality of personal information is an important aspect of the way Knell's conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to the Company's daily operations.

Knell's is committed to protecting and respecting personal information of its employees, customers, business partners and others in accordance with all applicable privacy laws.

Personal information is defined as any identifying information about an individual or group of individuals, including name, date of birth, address, phone number, e-mail address, social insurance/security number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

Business information is defined as the Company business address, business telephone number, name(s) of owner(s), executive officer(s), and director(s), job titles, business registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

The Company vows to protect personal information with the appropriate security measures, physical safeguards, and electronic precautions. The Company maintains personal information through a combination of paper and electronic files.

- Access to personal information will be authorized only for the employees and other agents of the Company who require the information to perform their job duties, and to those otherwise authorized by law.
- Company computer and network systems are secured by complex passwords. Only authorized individuals may access secure systems and databases.
- Active files are kept in locked filing cabinets.
- Routers and servers connected to the Internet are protected by a firewall and are further protected by virus attacks or "snooping" by sufficient software solutions.

This Privacy Policy informs of our commitment to privacy and establishes the methods by which privacy is ensured. This Privacy Policy applies to all personal information within the Company's possession and control including our website.

The Company has appointed the Company Executive as custodian of all privacy matters and legal compliance with privacy laws.

## Locations

Knell's Door & Hardware  
City: Kitchener  
Province: Ontario  
Country: Canada  
Website: [www.knells.ca](http://www.knells.ca)

G&A Lock & Security  
City: Waterloo & Guelph  
Province: Ontario  
Country: Canada  
Website: [www.galock.ca](http://www.galock.ca)

## Privacy Policy Details

### Information we collect and/or maintain

- We collect and use personal data to process sales and services transaction or inquiries; to employ staff and to satisfy government and regulatory obligations.
- Information is collected from you when you place an order in person, by phone or fill out an on-line form. When ordering or signing on our web-site, as appropriate, you may be asked to enter personal information such as: name, e-mail address, mailing address or phone number. It's Your Choice – interact with us how it suits you best. If you choose not to use the Internet/website to provide personal information you can contact us by telephone, fax, mail or in person. (Not all options may be available in every situation.)

### Consent

Consent occurs when a form or application is signed containing personal information, thereby authorizing the Company to collect, use, and disclose the individual's personal information for the purposes stated on the form or as identified in the "Information we collect or maintain" section.

- Implied consent is granted by the individual when they sign the application or form. This allows the Company to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or insurance companies) in the process of assessing the eligibility of an individual, customer, client, job applicant, or business partner.
- Implied consent is granted by using the Company Website.

### Anonymous Website Access

- You can access our website home page and browse our site without disclosing your personal data.
- Our website may use cookies on some parts of our site. A cookie is a small text file sent from a Web server and placed on your computer's hard drive. A cookie is generally used to enhance your browsing experience. You can choose to set your browser to detect and reject cookies, to accept cookies from all sites, or to prompt you whenever a site wants to send you a cookie. Check your browser's "Help" files to learn how to do this. If you choose to refuse cookies, you may not be able to access some of the interactive features on our websites.
- If you supply us with your contact information, you may hear from us about information for which you requested concerning products or services.

### How We Use Your Information

Any of the information we collect from you may be used in one of the following ways:

- To process sales, service or inquiry transactions.
- To improve our website – we continually strive to improve our website offerings based on the information and feedback we receive from you.
- To improve customer service – your information helps us to more effectively respond to your customer service requests and support needs. We may use and disclose data, which does not identify individuals, for statistical purposes to develop and enhance products and services.
- We may also collect personal information in order to satisfy legal, government and regulatory obligations.
- If you supply us with your contact information, you may hear from us about information for which you requested concerning products or services.

### How We Protect Your Information

- We maintain physical, electronic and administrative safeguards that are appropriate to the type of personal information we obtain from you.
- Company employees having access to personal data are required to respect the confidentiality of personal information and handle it responsibly.
- Security practices are continually evolving to ensure that the integrity and confidentiality of information and systems are maintained. We use up-to-date security safeguards to protect its networks and websites from misuse, alteration, copying, disclosure, destruction, monitoring or unauthorized sharing of information and

damage. Our safeguards include the use of security software and encryption protocols and involve physical, technical and procedural controls to protect information our firewall.

### Information Sharing

- We do not sell, exchange, transfer, or give personal information to any other Company or third party for any reason whatsoever, without the individuals personal consent, other than for the express purpose of delivering the purchased product or service requested.
- We do not disclose personal information to anyone else without their prior knowledge or consent, except when required by a government body or agency or as permitted by law.
- We may use and disclose data, which does not identify individuals, for statistical purposes to develop and enhance products and services.

### Services and Links of our Website

- Our Website will, from time to time, provide links to third party sites. At our discretion, we may include or offer third party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.
- The Company assumes no responsibility for the information practices of sites you are able to access through our site. We encourage visitors to review each site's privacy policy before disclosing any personally identifiable information.

### Correcting Personal Information

- In most instances, the Company will grant individuals access to their personal information upon presentation of a written request and satisfactory identification. If an individual finds errors of fact with their personal information, please notify the Company as soon as possible to make the appropriate corrections.
- Should the Company deny an individual's request for access to their personal information, the Company will advise in writing of the reason for such a refusal. The individual may then challenge the decision.

### Steps You Can Take To Protect Your Online Activities

- Users are encouraged to learn about protecting their own computers to ensure that their online activities remain private.

### Ongoing Relevancy | Changes to our Privacy Policy

- The Company regularly reviews its policies and procedures to ensure we remain current with changing laws and evolving public expectations. Should there be changes they will be posted on our website, including a modification date.

### Privacy Questions | Contact Us

- Any questions or concerns regarding this Privacy Policy can be addressed by contacting us:  
Robert Dippell: 2090 Shirley Drive, Kitchener, ON N2B 0A3 | 519-578-1001 (ext.254) rdippell@knells.ca
  - We will investigate and respond to concerns about any aspect of the handling of personal information and will address concerns to the best of its abilities.



Rob Dippell, President

March 1, 2019

Date