

## Intent

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.

The company strives to protect and respect personal information of its customers, employees, business partners, and so on in accordance with all applicable statutory requirements. All employees must abide by the procedures and practices set out below while handling personal information.

## Guidelines

This policy outlines the company's commitment to privacy and establishes the methods by which privacy is ensured

Personal information is any factual or subjective identifying information about an individual or group of individuals. This can include name, date of birth, address, income, e-mail address, social insurance number, gender, evaluations, credit records, and so forth.

Business information is confidential information related to a specific business that is not readily available to the public, such as names of executive officers, business registration numbers, proprietary information, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

Consent occurs and is considered obtained by Knell's when an individual provides express consent orally, in writing, or through an applicable online action. Before being asked to provide consent, individuals will be provided with the reasons their personal information is being collected, how it will be used and stored, and any disclosure or possible disclosure of the information.

Implied consent is granted by the individual where consent may reasonably be inferred from the action or inaction of the individual. Where possible, this should always be followed up by a Knell's representative to obtain express consent.

- Implied consent is granted by the individual when they sign an 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.

## 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 website, 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.)

## Policy Statements

Knell's assumes full accountability for the personal information within its possession and control. The company has appointed the Executive Team as custodian of all privacy matters and legal compliance with privacy laws.

In the course of conducting its business, the company may have to obtain personal information directly from the individual to whom the information belongs. Individuals whose personal information is being collected are at all times entitled to know how the company uses their personal information and that the use of any personal information collected is limited to only what is needed for those stated purposes. If necessary, the Company will obtain individual consent if personal information is to be used for any other purpose.

The company will not use that information without the consent of the individual.

Under no circumstances will the company sell, distribute, or otherwise disclose personal information, including personal contact information or employee lists, to third parties, unless required to do so by law. This may include consultants, suppliers, or business partners of the company, but only with the understanding that these parties obey and abide by this policy, to the extent necessary of fulfilling their own business duties and day-to-day operations.

The company will retain personal information only for the duration it is needed for conducting its business and ensuring statutory compliance. Once personal information is no longer required, it will be destroyed promptly, safely, and securely. However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy.

The company will take every reasonable precaution to protect personal information with appropriate security measures, physical safeguards, and electronic precautions. The company maintains personal information through a combination of paper and electronic files. Where required by legislation or disaster recovery or business continuity policies, older records may be stored in a secure, offsite location.

Knell's will ensure:

- Access to personal information is 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;
- The company's computer network systems and databases are secured by complex passwords and firewalls to which only authorized individuals may access;
- Active physical files are kept in locked filing cabinets;
- Routers and servers connected to the Internet are protected by a firewall, and are further protected against virus attacks or "snooping" by sufficient software solutions;
- Personal information is not transferred to employees, volunteers, summer students, or any other person in the company unless authorized.

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.

## Locations

Knell's Door & Hardware | Industrial | Lock & Security

City: Kitchener

Province: Ontario

Country: Canada

Website: [www.knells.ca](http://www.knells.ca)

Production Site

City: Waterloo

Province: Ontario

Country: Canada

Website: [www.knells.ca](http://www.knells.ca)

## Privacy Policy Details

### 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.
- While IP addresses may be logged in order to administer our site, track visitor movement, and gather demographic information, these IP addresses will not be linked to any personally identifiable information.
- Should the company engage in any registration or order form asking site visitors to enter personal or financial information it will be protected by SSL encryption. Site visitors may opt out of having their personal information used at the point where the information is gathered.

### 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.
- We may share compiled demographic information with its business partners or advertisers, but no personal information that can identify any individual person will be disclosed.

### 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.

### Use of Personal Information, without consent

The Company may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:

- The collection is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- The personal information was produced by the individual in the course of their employment, business, or profession, and the collection is consistent with the purposes for which the information was provided;
- The collection is made for the purpose of making a disclosure required by law; or
- Any other reason as defined in applicable legislation

### 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

June 2, 2023

Date