

PRIVACY POLICY

Bercomac Limitée

ARTICLE 1: PREAMBLE

The purpose of this privacy policy is to inform users of *Bercomac Limitée's* website:

- On how their personal information are collected. Any information that identifies a user or his company are considered as personal information, as such, it may be:
 - first and last name, age, postal and email address, location, IP address, company name, or any other information that identifies a user. This information is referred below as **General Personal Data**;
 - all sensitive information allowing a business transaction to be established with this person, such as social insurance number, bank account & credit card number or other. This information is referred to below as **highly confidential personal data**.
- On the rights they have with respect to these data.
- On the person responsible for processing all collected and processed personal data.
- On the recipients of this personal data.

This policy supplements the legal notices and the General Conditions of Use available to users at the following address:

www.bercomac.com, at the « Dealer Access » Section

ARTICLE 2: PRINCIPLES RELATING TO THE COLLECTION AND PROCESSING OF PERSONAL DATA

The personal data are:

- Processed in a lawful relevant and confidential manner with regards to the party concerned.
- Collected for the purpose of establishing explicit and legitimate business transactions (section 3.1) and must not be performed in a manner inconsistent with those purposes.
- Accurate and, if necessary, kept up to date. All reasonable steps must be taken to ensure that inaccurate personal data is rectified or erased without delay.
- Kept and treated confidentially, for as long as necessary, allowing us to serve you better.
- Immediately destroyed after the purpose of the need or the transaction.
- Processed in such a way as to ensure appropriate security of the data collected; including protection against unauthorized or unlawful processing as well as against accidental loss, destruction, or damage of personal data by means of appropriate technical and/or organizational measures.

Processing is only lawful if at least one of the following conditions is met:

- The party concerned has approved to the processing of their personal data for business transaction purpose.
- Processing is necessary for the execution of a contract to which the party concerned is part of or for the execution of pre-contractual measures taken at the request of the party concerned.
- The processing is necessary for compliance with a legal obligation to which the data representative of Bercomac Limitée is submitted.
- The processing is necessary to safeguard the vital interests of the party concerned or another natural person.
- The processing is necessary for the execution of a public interest or public authority assignment entrusted to the data representative.

- Processing is necessary for the legitimate interest purposes pursued by the data representative or by a third party, except where such interests are overridden by the interests or by fundamental rights and freedoms of the individual who requires personal data protection, especially when this person is a child.

ARTICLE 3: PERSONAL DATA COLLECTED AND PROCESSED WHILE BROWSING ON THE WEBSITE

Article 3.1: Data collected

The personal data collected as part of our business relationship or according to the needs of the transaction may be as follows:

General personal data:

Last name, first name, location, telephone contact, fax or email, IP address, title and position held in the company, business name and contact information, branches and contact information, credit application, bank name and address, company constituent names, share percentage, supplier credit references, tax number, customer contact information and any other information required for a business transaction completion.

Highly confidential personal data:

Social insurance number, bank account number, credit card number, and any other information needed for the completion business transaction.

The collection and processing of these data meets the following purpose(s):

Opening a dealer account, opening a line of credit, contracts management, dealer account management, financial management of the dealer account, quality ensured and continuous improvement, claim request, return of goods, visibility on our website, promotional support, statistics, sending promotions and newsletters, as well as any other processing necessary for the purposes of business transactions.

Your data are stored by the data representative of Bercomac Limitée under reasonable security conditions, according to the following 2 options:

- **General personal data:** for a maximum period of 6 years after the purpose of your last transaction or following your request to destroy your data.
- **Highly confidential personal data:** destroyed immediately after the purpose of the punctual or transactional need or following your request for destruction of your data.

The Company may retain certain personal data beyond the time limits indicated above to fulfil its legal or regulatory obligations.

Article 3.2: Data hosting:

The www.bercomac.com website is hosted by: AWS “Amazon Web Services, Inc.”
410 Terry Ave. N, Seattle, Washington, USA, 98109
Tel: (206) 266-1000

Article 3.3: Data transmission to third parties:

General personal data may be transmitted to our web designer and our computer system designer only for the purpose of analysis, modification, or improvement. Contact details of these two partners are available on request.

No highly confidential personal data is transmitted to them.

ARTICLE 4: DATA REPRESENTATIVE AND DATA PROTECTION OFFICER

Article 4.1: Data controllers

Personal data is collected by Bercomac Limited, a federally chartered company incorporated in Canada. They are under the responsibility of our customer service, sales, and administrative teams.

Those representative of Bercomac Limitée for processing personal data may be contacted in the following manner, specifying “processing of personal data”:

By mail to 92 Fortin Street North, Adstock, Quebec, Canada, G0N 1S0.

By telephone at (877) 772-3726; By fax at (800) 430-2252.

By email: cs@bercomac.com

Article 4.2: Data Protection Officers

The company’s data protection officers are:

Sales Manager and Managing Director, Bercomac Limited

After contacting us, if you feel, that your “Technology and Freedom” rights are not being respected, you can send a request to the Office of the Privacy Commissioner of Canada.

ARTICLE 5: USER RIGHTS IN DATA COLLECTION AND PROCESSING

Any user concerned by the processing of his personal data may invoke the following rights:

- Right of access, rectification and right to erasure of data.
- Right to data portability.

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- Right to limitation and opposition of data processing.
- Right not to be subject to a decision based exclusively on an automated process.
- Right to determine the fate of data after a business closure or the death of an individual.

To exercise your rights, please send your letter to the company mail address or send an email to the attention of the Sales Manager at « cs@bercomac.com » and cc the General Manager at « administration@bercomac.com ».

For one of the data controllers to be able to grant the user's request, the one may be required to provide him with certain information such as: his first and last name, his email address and his account number or subscriber.

ARTICLE 6 : CONDITIONS DE MODIFICATION DE LA POLITIQUE DE CONFIDENTIALITÉ

The publisher of the Bercomac Limitée's website reserves the right to modify this Policy at any time ensuring the users of its conformity with the law in force.

Any future modifications may not affect purchases previously made on the website, which remain subject to the Policy in force at the time of purchase and have been accepted by the user when validating the purchase.

Users are encouraged to review this Policy from time to time when using the services, without the need for formal notification.

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