

REXEL CANADA ELECTRICAL INC.
PRIVACY POLICY

[Last updated: February [●], 2019]

Rexel Canada Electrical Inc., its parent company and its subsidiaries (“**Rexel**”) is committed to maintaining the accuracy, security and privacy of personal information in accordance with applicable legislation. This Policy is a statement of principles and guidelines concerning the protection of personal information of our clients, service providers and other individuals (“**you**”).

CONSENT

BY SUBMITTING PERSONAL INFORMATION TO REXEL OR ITS AGENTS, YOU AGREE THAT WE MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting the Chief Privacy Officer of Rexel as indicated below. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you.

1. Personal information collected

For the purposes of this policy, personal information means information about an identifiable individual. Such information includes your name, home address, telephone number, mobile device ID, username, usage information, personal email address, billing and account information, as well as other personal information you may provide to us from time to time.

2. Why is personal information collected?

We collect your personal information for the purposes listed below:

(a) To provide the product, information or service you requested

If you are a customer, we use your name, telephone number and address (postal and/or email) in order to deliver the product, information or service you requested and to follow up with you about the transaction (i.e., send a bill etc).

(b) To process payment

Your credit card number, debit card number, or banking information for identification and pre-authorized payments is used only for processing payments and for presenting you with payment options - not for marketing purposes.

(c) To send you information about products, information or services

From time-to-time and in accordance with applicable legislation, we may send you further information about our products and services, including via email, SMS and push notification on your mobile device.

(d) Other purposes

In addition, from time to time, we may use your personal information for the following purposes:

- to detect and protect Rexel and other third parties against error, fraud, theft and other illegal activity, and to audit compliance with Rexel policies and contractual obligations;
- to understand and respond to client, supplier and other third party needs and preferences, including to contact and communicate with such parties and to conduct surveys, research and evaluations;
- to engage in business transactions, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving Rexel;
- as permitted or required by law; and
- for any other purpose to which you consent.

If you would prefer for us NOT to use your information as described above in section 2(c), simply inform us (see "additional information" below).

3. Disclosure of personal information

We may disclose your personal information to the following third parties in the following circumstances:

(a) Disclosure to Service Providers

We may disclose your personal information to other companies that provide services on our behalf, including financial institutions, securitization agents, external auditors or payment processors. In addition, we may disclose your personal information to an organization or individual retained by Rexel to evaluate your creditworthiness or to collect debts outstanding on an account or to our auditors. We use third-party vendors to carry out certain activities, including sending email and Push Notifications. In these cases we share your data with our business partners to perform these actions. Our partner companies agree to abide by our data privacy requirements. We will only provide those companies the information they need to deliver the service and they are prohibited from using that information for any other purpose.

(b) Disclosure to Affiliates

We may disclose your personal information to any of the companies and business

entities that form part of the Rexel group (i.e. amongst Rexel Canada Electrical Inc., its subsidiaries and affiliates) in order to serve you better and to provide you with information about our affiliates' products and services.

(c) Disclosure to Trading Partners

From time to time we may make our list of customers available to other carefully screened organizations that want to let you know about a product or service that might interest you. The material to be sent to you is reviewed by us before the names and addresses (including e-mail addresses) are released to ensure the company is reputable and their materials are appropriate and not misleading.

(d) Disclosure in Business Transfers

Rexel may be involved in the sale or transfer of some or all of its business. As part of that sale or transfer, Rexel may disclose your personal information to the acquiring organization, but will require the acquiring organization to agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy.

(e) Law Enforcement and Legal Disclosure

Rexel may disclose your personal information to a government institution that has asserted its lawful authority to obtain the information or where Rexel has reasonable grounds to believe the information could be useful in the investigation of unlawful activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with court rules regarding the production of records and information, or to Rexel's legal counsel.

If you would prefer for us NOT to share your information as described above in sections 3(b) or 3(c), simply inform us (see "[additional information](#)" below).

4. Access to your personal information

Upon your written request, subject to certain exceptions, Rexel will inform you of the existence, use, and disclosure of your personal information and will give you access to that information. Access requests should be sent to the Chief Privacy Officer, using the contact information below.

5. Storage of personal information

Your personal information is stored in secured locations and on servers controlled by Rexel or its service providers, located either at our offices or at the offices of our service providers. Your personal information may be transferred to, stored, and processed in a country that is not regarded as providing the same level of protection for personal information as the laws of your home country, and may be available to the government of those countries under a lawful order made in those countries.

6. Protection of your personal information

To help protect the confidentiality of your personal information, Rexel employs administrative and technological safeguards appropriate to the sensitivity of your personal information. Where personal information is sent to a third party for processing, we obtain a commitment from such third party, that all customer information is kept secure. We operate secure data networks protected by industry standard firewall and password protection systems.

7. E-Mail Communications

Occasionally, we may send marketing or promotional e-mail communications to you in accordance with applicable law with information that may be useful, including information about the services of Rexel and other third parties with whom we have a relationship. We will not send you any e-mail communications pursuant to this Privacy Policy unless you have consented for us to do so in accordance with applicable law, and we will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future e-mails from Rexel.

8. Mobile Push Notifications

If you are a user of our mobile Apps, by opting in to receive Push Notifications you may receive transaction notifications such as: order confirmations; status updates; delivery notifications. Push notifications or alerts to your mobile device may be sent even when you are not logged into the App. We use push notifications to send you transaction updates, urgent business notices and marketing offers. At any time, you can manage your push notification preferences or deactivate these notifications by turning them off in your mobile device settings. If you choose not to receive push notifications, you may still receive In-App notifications within the App.

You may opt-in or opt-out to receiving push notifications directly in your mobile phone by going to your device "Settings", then selecting "Notifications" to edit these options for any app on your mobile device. Different device configurations or updates may affect how these settings work. Your choice to opt-out of notifications from the App will not affect ads or notifications from any other organization.

9. Privacy and our Website

- (a) Cookies** - When an individual visitor accesses a Rexel website, we may use a browser feature called a 'cookie' to collect website information, user preferences and user data such as the type of Internet browser and operating system the visitor uses, the domain name of the website from which the visitor came and which the visitor visits after visiting our website, date and duration of the visit, number of visits, average time spent on our website and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies the visitor's browser, but not the visitor, to our computers each time our website is visited. Unless a visitor specifically

informs us (e.g. by registering for an event or sending us correspondence from the website), we will not know who the individual visitors are. In addition to the identified purposes described in our Privacy Policy, we may use this information and share it with other organizations with whom we have a commercial relationship to measure the use of our website, to improve the functionality and content of our website and to facilitate usage by a visitor. This information may also be used to provide visitors with tailored marketing and help third parties improve their own products and services. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on our website. To opt out specifically from the use and sharing of this information with Google, visitors may opt out of the Google Analytics Measurement Program and Google AdWords® Remarketing by accessing the respective following links: <https://tools.google.com/dlpage/gaoptout> and Google's Ads Preferences Manager.

- (b) **Online Communications** – In order to provide our website visitors with a service or information, visitors may voluntarily submit personal information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, participating in a seminar or other event, and participating in contests and surveys. If you are known to Rexel as a registered user of an online service, we may combine and store personal information about your use of our website and the online information you have provided with certain other online and offline information we may have collected.
- (c) **Links** - Our website may contain links to other websites which are provided as a convenience only. Visitors are advised that other third party websites may have different privacy policies and practices than Rexel, and Rexel has no responsibility for such third party websites.

10. Changes to the Privacy Policy

Rexel reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes on our Intranet or website and make such revised policy and changes available upon request to the Rexel Chief Privacy Officer. However, Rexel will obtain the necessary consents required under applicable Privacy Laws if it seeks to collect, use or disclose an individual's personal information for purposes other than those to which consent is obtained unless otherwise required or permitted by law.

11. Additional information

Rexel has appointed the General Counsel as Chief Privacy Officer to oversee compliance with this Privacy Policy and applicable privacy laws. For information on Rexel's customers related privacy practices, please contact the Rexel Chief Privacy Officer as follows:

Rexel Chief Privacy Officer,
505 Locke Street,

Suite 200
Ville St-Laurent, Québec
H4T 1X7
Fax: (514) 342-9838
[e-mail: cpo.cprp@rexel.ca](mailto:cpo.cprp@rexel.ca)