

## **Privacy Policy**

This Privacy Policy (the "**Privacy Policy**") sets out the privacy policies and practices for Sycor International Inc., Sycor Technology Incorporated and any and all subsidiaries and affiliated companies (the "**Company**", "**we**", "**us**", "**our**") with respect to how the Company collects personal information of its users, consumers, clients, service providers, distributors, retailers, suppliers and other individuals ("**you**", "**your**"). It also describes how the Company uses, maintains, retains, transfers and discloses your personal information. This Privacy Policy applies to information collected from you by the Company via [www.sycor.com](http://www.sycor.com), [sycor.net](http://sycor.net), [sycor.ca](http://sycor.ca), [thewirestore.ca](http://thewirestore.ca) and [thewireshop.ca](http://thewireshop.ca) the "**Website**") and other places where, or means by which, we may collect personal information. This Privacy Policy also sets out how you can access certain information that the Company may collect about you and explains the choices you have regarding any collection, use, maintenance, retention, transfer and disclosure of such information, and how you may access or correct that information. In this Privacy Policy, "**personal information**" means any information about an identifiable individual or information that allows an individual to be identified, as defined from time to time in applicable privacy legislation. Personal information does not include business contact information such as your name, title or position, business address, telephone number, facsimile number or e-mail address.

### **Your Consent**

BY SUBMITTING PERSONAL INFORMATION TO US, YOU AGREE THAT WE MAY COLLECT, USE, MAINTAIN, RETAIN, TRANSFER 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 at any time by contacting the Company's Privacy Officer at the address provided below. If you refuse or withdraw your consent, you acknowledge that we may not be able to provide you, or continue to provide you, with certain services, products or information. If you provide us with personal information of another individual, you represent to us that you have that individual's consent to allow us to collect, use, maintain, retain, transfer and disclose that personal information in accordance with this Privacy Policy.

You are responsible for ensuring the accuracy of the personal information that you submit to us. Inaccurate information will affect your experience when using the Website and our ability to contact you as described in this Privacy Policy.

### **Amendments of This Privacy Policy**

We may change, modify, add or remove portions of this Privacy Policy at any time and from time to time, without prior notice to you. We will treat your continued use of the Website following such change, modification, addition or removal as your acceptance of such revisions. All revisions will be posted on the Website and will apply to any personal information collected on or after the date posted. We will obtain the necessary consents required under applicable privacy laws if we seek to collect, use, maintain, retain, transfer or disclose your personal information for purposes other than those to which consent has been obtained unless otherwise required or permitted by law.

This Privacy Policy was last updated on April 12, 2018.

### **Collection of Your Personal Information**

We may collect personal information in connection with your use of the Website or with your use or purchase of the Company's products and services, which may include personal information provided in connection with the following activities:

- (a) Registering or filling in forms on the Website. This includes information you may provide when you request additional information about the Company's products and services or sign up to receive the Company's e-mail newsletters or coupons;
- (b) Purchasing any product or service from the Company;
- (c) Requesting information or assistance from the Company. The Company may also keep a copy of any communications or correspondence you may send to it, including any e-mail communications;
- (d) Pursuit of employment opportunities;
- (e) Using other features, including Interactive Functions (as such term is defined in the Website [Terms and Conditions of Use](#) the "Terms and Conditions")) of the Website that may be offered from time to time, and may require such information in order to utilize the feature (including but not limited to making a User Submission as defined in the [Terms and Condition](#) and
- (f) Registering for an account.

The personal information that we may collect may include your name, username, password, email address, telephone number, CV, resume, and employment preferences and any other personal information that you choose to include in your profile, your User Submissions (as defined in the Terms and Conditions), or in other communications to the Company. We may combine personal and non-personal information about you collected by us or by our affiliates, retailers and distributors, and we may combine this information with information from external sources.

In obtaining your consent to collect, use, maintain, retain, transfer and disclose your personal information we will use reasonable efforts to inform you of the purpose for which personal information will be collected, used, maintained, retained, transferred or disclosed. The form of consent may vary depending on the circumstances and type of information disclosed. We will take into account the sensitivity of the personal information and your reasonable expectations when determining the appropriate form of consent.

### **Employment Opportunities**

If you voluntarily choose to submit personal information to us in connection with the pursuit of employment opportunities with us, we may use your personal information other than as specified in this Privacy Policy. In such case, we may provide your personal information to our offices

worldwide for use in connection with employment search-related purposes and for use in connection with matters relating to your use of the Website. If you do not wish for your personal information to be disclosed to any of our offices, you should not submit personal information via the Website.

### **Cookies**

We may use a browser feature called a 'cookie' to collect information when you access the Website. A cookie is a small text file containing a unique identification number that identifies your browser, but not necessarily you, to our computers each time you visit the Website. The information that may be collected includes the type of internet browser and operating system you use, the domain name of the website from which you came, date and duration of your visit, number of visits, the average time you spent on the Website, pages viewed and number of cookies accumulated. Unless you specifically inform us (for instance, by sending us correspondence from the Website), we will not know who you are. In addition to the purposes described in our Privacy Policy, we may use such Website information and share it with third parties with whom we have a commercial relationship to measure the use of the Website, to improve the functionality and content of the Website and to simplify your usage. You can reset your browser either to notify you when you receive a cookie or refuse to accept cookies. If you refuse to accept cookies, you may not be able to use some of the features available on the Website.

### **Online Communications**

You may voluntarily submit personal information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, purchasing a product or service, subscribing to a newsletter or a mail or e-mail list and participating in contests and surveys. If you are a registered user on the Website, we may combine and store personal information about your use of the Website and information you have provided to us with certain other online and offline information we may have collected.

### **E-mail Communications**

We may send you marketing or promotional e-mail communications. In this process, we may collect certain information such as the date and time you first opened our e-mail communications, the number of times you open our e-mail communications, the number of instances you click through our articles and your total click-through activity on the contents of our e-mail communications. We may also combine and store any such information to manage and improve our e-mail communications. If you no longer wish to receive any future marketing or promotional material from us, our promotional e-mail communications will include instructions on how to unsubscribe and inform us of your preferences.

### **Third Party Websites**

We may include links to other websites on the Website or in our e-mail communications. These third-party websites may collect your personal information and they may have different privacy policies and practices than us. We do not assume any responsibility for the privacy practices,

policies or actions of the third parties operating these third-party websites. We strongly encourage you to read the privacy policies of these websites to enable you to make an informed decision whether or not to provide your personal information to these websites' operators.

### **Third-Party Analytics**

To evaluate the usage of the Website, we use automated devices and applications provided by third parties, such as Google Analytics (including Google Analytics' Demographics and Interest Report). We use these tools to help us improve our products and services, our performance and user experiences. These entities may: (a) use cookies and other tracking technologies which collect information to perform their services; and (b) collect personal information directly through the use of cookies and other tracking technologies. Please go to the Google Privacy Policy to learn more. If you wish to opt out of Google Analytics data collection, please use the Google Analytics Opt-Out Browser Add-On.

### **IP Addresses**

An IP address is a computer's numeric address, by which it can be located within a network. We may record your IP address when you visit the Website. We may use your IP address to: (a) help diagnose problems with the Company's server; (b) administer the Website; (c) identify you when we believe it is necessary to enforce compliance with this Privacy Policy or the Terms and Conditions; or (d) protect the Website and our systems, information, employees, service providers, business partners, affiliates, users, customers, distributors, retailers and others.

### **Protection of Your Personal Information**

To: (a) prevent unauthorized access to, or disclosure of, personal information; (b) maintain data accuracy; and (c) facilitate the appropriate use of your personal information; we use physical, technological and administrative procedures to protect your personal information that we collect from loss, unauthorized access, modification, unauthorized disclosure or other misuse. Nevertheless, internet or wireless transmissions are never completely private or secure. You understand that any messages, content or information you send or submit through the Website may be read or intercepted by others. If you have any questions about the security of your personal information collected by us, please contact the Company's Privacy Officer at the address below.

### **Use of Your Personal Information**

Once we collect your personal information, we may use such personal information internally, separately or in combination with any pre-existing information for the following purposes:

- (a) To develop, enhance, market, sell or otherwise provide information, products or services;
- (b) To process and fulfill your order, including to send you emails to confirm your order status and shipment, and other related emails;
- (c) To administer your account;

- (d) To assist with billing and the collection of accounts;
- (e) To provide you with transaction receipts for manufacturer warranty or repair issues;
- (f) To help us learn more about your shopping preferences;
- (g) To establish and conduct commercial relationships, including to process purchases or other transactions and to conduct or administer other transactions that you may engage in with us;
- (h) To conduct or administer contests, sweepstakes or other promotions in which you have participated;
- (i) To contact you and to respond to any communications that you may have had with us;
- (j) To troubleshoot problems with the Website;
- (k) To customize your experience or homepage on the Website;
- (l) To develop and manage our business and operations;
- (m) To enforce our Terms and Conditions and this Privacy Policy;
- (n) To conduct surveys, research, evaluations and measurement activities;
- (o) To market, sell or otherwise provide products and services of third parties with whom we have a commercial relationship;
- (p) To detect, and to protect the Company and other third parties against, error, negligence, breach of contract, fraud, theft and other illegal activity;
- (q) To audit compliance with our policies and contractual obligations;
- (r) To distribute our newsletters and other informational e-mail communications and other material to individuals on our mail and e-mail lists;
- (s) To obtain your feedback on the Website, our services and products;
- (t) To engage in business transactions, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving the Company;
- (u) As permitted by, and to comply with, any legal or regulatory requirements or provisions;
- (v) To use, maintain, retain, transfer and disclose your personal information if the Company is required to do so by law or legal process or if the Company determines, in its

sole discretion, that such action is necessary to protect the rights of the Company, third parties and other users of the Website or to respond to your request for customer service; or

(w) For any other purpose to which you consent.

### **Disclosure of Your Personal Information**

Except as provided for in this Privacy Policy, we will not sell, rent, lease, commercially exploit or otherwise disclose your personal information or data to third parties unless: (a) we are required to do so by law or to cooperate with legal investigations; (b) it is required to protect the legal interests of the Company, including for credit checking and collection purposes or in connection with a potential financing, merger or acquisition; or (c) you provide consent to such disclosure.

Occasionally, we may disclose your personal information to:

- (a) Third party service providers or vendors with whom we have a contractual relationship;
- (b) An organization or individual retained by us to collect outstanding debts;
- (c) A financial institution;
- (d) A person who, in our reasonable judgment, is providing or seeking the information as your agent;
- (e) Our personnel or contractors;
- (f) Our distributors and retailers;
- (g) Government authorities, regulatory agencies, insurers, benefits providers, consultants or agents; and
- (h) Any third party or parties, where you consent to such disclosure or where disclosure is required or permitted by law.

In certain situations, we may use, maintain, retain, transfer or disclose personal information without your knowledge or consent (as permitted or required by law). These circumstances may be:

- (a) Where your personal information is publicly available;
- (b) Where collection or use of the personal information is unmistakably in the interests of the individual and consent cannot be obtained in a timely manner;
- (c) To investigate a breach of an agreement or a contravention of law;

- (d) In the event of a corporate change in control of the Company resulting from, for example, a merger, a reorganization, a sale of assets or bankruptcy;
- (e) To comply with a subpoena, warrant, court order or as required or otherwise permitted by law; and
- (f) When information is being collected for the detection and prevention of fraud or for law enforcement.

### **Retention of Your Personal Information**

After we have collected your personal information, we may retain a record of your personal information (including correspondence or comments). We will continue to use, maintain, transfer, disclose or retain your personal information for as long as necessary to fulfill the purposes for which it was collected and as required or permitted by law. However, we will take reasonable steps to destroy or permanently de-identify personal information we hold if it is no longer needed for our business purposes.

### **Access to, and Correction of, Your Personal Information**

If you do not want your personal information collected, used, maintained, transferred, disclosed or retained by us as provided in this Privacy Policy, you should not use the Website and you should refrain from: (a) registering for any specific tool or application that collects personal information; and (b) purchasing any product or service from us. You may request a copy of the personal information which you have provided to us by advising our Company's Privacy Officer at the address provided below. If you have any questions or enquiries relating to our privacy practices or procedures, or if you believe that the personal information that the Company holds about you is not accurate, complete or up-to-date, you may write to the Company's Privacy Officer at the address provided below. If you are able to establish that the information is not accurate, complete or up to date, we will take reasonable steps to correct the information so that it is accurate, complete and up-to-date.

### **Non-Canadian Users**

If you are located outside of Canada, please note that the information you provide to us will be used, maintained, retained, transferred and disclosed in Canada, where laws regarding use of personal information may be less stringent than the laws in your country. By using this Website, you consent to such use, maintenance, retention, transfer and disclosure. You also consent to the adjudication of any disputes arising in connection with the Website, this Privacy Policy and the Terms and Conditions in the Federal Court of Canada and the courts of the Province of Ontario.

### **Questions or Comments**

We welcome questions and comments about this Privacy Policy. If you wish to access, verify and/or amend your personal information or make a complaint under this Privacy Policy, please contact the Company's Privacy Officer at:

Attn: Privacy Officer

1-2220 Argentia Road  
Mississauga, Ontario  
L5N 2K7  
Fax: 905-821-7260  
Email: [admin@sycor.com](mailto:admin@sycor.com)