



*In or Out... we make it Easy!™*

## Privacy Policy

### Commitment to Privacy

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This policy establishes the practices and procedures of RCI when collecting, using, retaining and disclosing personal information under the Personal Information Protection and Electronic Documents Act (PIPEDA).

RCI is committed to protecting the privacy of customers. This Privacy Policy provides details regarding why personal information is collected, what is done with that information, the steps taken to ensure that access to that information is secure, how to access personal information and who to contact with any questions or concerns about RCI's policies or practices.

### Use of Personal Information

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RCI will only use personal information in a manner, which is appropriate within the context of a business relationship, and will always disclose the purpose for collection of this information.

Much information gathered about customers is general information. RCI may use general information to provide the customer with product information, seminars, or trade shows which may be of interest.

Personal information is collected from customers in three specific ways:

- Purchasing information is retained about customers. This includes purchase frequency; method of payment and payment frequency. This information is required for RCI's records.
- Credit information is collected from the customer and from D&B and/or Equifax. This information is used to ensure the ability of customers to make payments when credit is extended.
- RCI may conduct surveys on occasion to better understand the needs of customers. At the time a survey is conducted, RCI will inform customers as to how the information will be used.

### Information Shared with Third Parties

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It is against RCI's policy to sell personal customer information to any third parties without consent. However, RCI may share personal information with some third parties:

- In accordance with any valid legal requirement under law
- To accountants, auditors, agents and lawyers employed by RCI
- With D&B and/or Equifax and its members

### Consent

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If you choose to provide personal information, RCI assumes that you consent to the collection, use and disclosure of your personal information as outlined in this Privacy Policy. RCI will only use and disclose personal information for the purpose it was intended.



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## Limiting Collection

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Collection of personal information is limited to the purpose that it was collected for. No more information will be collected about an entity than is necessary for the purposes identified.

If personal information already collected is to be used for a different purpose than it was originally obtained for, then additional consent will be obtained before it can be used for that purpose.

## Use, Disclosure, and Retention

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Personal information can be disclosed to a third party, when necessary for transacting business. Any personal information that is given to a third party must be disclosed to the customer and consent must be granted.

Personal information will be retained as long as the purpose for which it was collected is still relevant. Any personal information that has been collected, but is no longer required, will be destroyed.

## Accuracy

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Personal information is to be kept accurate and current. This information is updated as required or at the customer's request.

## Safeguards

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Improper access, modification, collection, use, disclosure or deletion of personal information is limited by physical and electronic security measures. More sensitive information is held under increased security measures.

- All personal information contained in *paper documents* is kept secure in a filing cabinet, which is protected with a physical lock.
- *Electronic documents*, which contain personal information, are password protected and accessible only to approved employees.
- Access to financial payment information such as credit card or bank information is restricted to RCI employees and external service providers only on a "need to know" basis.

## Openness

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All customers will have access to the specific information contained in the Privacy Policy. The Privacy Policy is available for review on the RCI web site <http://www.rutherfordcontrols.com/>.

## Website Policies

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*Cookies* are set on computers accessing the RCI website to provide customers with information that is relevant to them. A cookie is a small data set, which is stored on the hard drive of the computer that seeks information. The cookie ensures that the computer will be recognized and directed to the correct area within the website upon return. Web browsers can be set to refuse any cookies to be set.



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The RCI website logs *IP addresses* of visitors but does not collect any specific information. This information is collected to indicate the number of hits on the website and the regions from which these hits are coming.

The RCI website contains *links* to other websites. These websites are operated by third parties and have their own Privacy Policies. RCI is not responsible for the Privacy Policies or content of the other sites.

### **Changes to RCI's Privacy Policy**

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RCI may modify the Privacy Policy from time to time. Please review the Privacy Policy on the RCI website periodically so that you are aware of any changes.

### **Access and Correction of Personal Information**

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All customers may review their personal information at reasonable intervals. Customers may obtain their personal information from the Privacy Commissioner. This information will be made available within thirty days of the request.

A customer may note an inaccuracy of personal information and recommend an amendment. RCI will amend the information if it is warranted.

### **Recourse**

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Customers may challenge RCI's Privacy Policy by notifying the Privacy Commissioner who is accountable for compliance. The Privacy Commissioner will:

- Ensure that RCI complies with PIPEDA
- Receive any complaints with regards to personal information and how RCI handles it
- Conduct investigations therein
- Resolve these complaints

When a complaint is found to be justified, corrective measures will be taken immediately and policies will be amended accordingly.

**RCI's Privacy Commissioner can be reached at:**

**Phone: (519) 621-7651, extension 2409**

**Email: [privacy.commissioner@rutherfordcontrols.com](mailto:privacy.commissioner@rutherfordcontrols.com)**

If an employee is not happy with the findings of RCI's Privacy Commissioner then they may contact the **Privacy Commissioner of Canada at:**

**Phone: (613) 995-8210**

**Toll-free: 1-800-282-1376**

**Email: [info@privcom.gc.ca](mailto:info@privcom.gc.ca)**