

# Policy on the collection, use and disclosure of personal information.

By providing Morin Supply with your Personal Information, you agree and consent that Morin Supply and/or our agents may share, collect, use, and disclose your Personal Information in accordance with this Privacy Policy ("Policy Statement"). If you do not agree with these terms, you are requested not to provide Morin Supply. any Personal Information. Unfortunately, certain services can only be offered if you provide the Personal Information required. Consequently, if you do not consent to provide your Personal Information, Morin Supply may not be able to offer you with those services.

## Objective & Scope of Policy

Morin Supply is committed to respecting your privacy and has prepared this Policy Statement to provide you with information about how Moring Supply shares, collects, uses, and discloses your Personal Information.

This Policy Statement governs Personal Information collected from and about individuals who are or may become Clients of Morin Supply and those other third parties with whom Morin Supply works with and or who may provide us with Personal Information. This policy does not cover business contact information, corporate information, or aggregated data from which the identity of an individual cannot be determined. We retain the right to use aggregated data in any way that we determine is appropriate.

Should you have questions about: (i) access to your Personal Information; (ii) Our collection, use, management, or disclosure of your Personal Information; or (iii) this Policy Statement; please contact: Julie Carisse **at 613-224-9980 (Privacy Officer).** 

# What is personal information?

Personal Information means any information, recorded in any form, about an identifiable individual, or an individual whose identity may be inferred or determined from such information. However, Personal Information does not include business contact information, such as name, position or title, business address, business phone numbers, business fax number or business e-mail address.

# What type of information do we collect?

- Contact information; we may collect the names and of our Clients. We may also collect their purchase history, billing and shipping addresses, phone numbers, email addresses, and other digital contact. We may also collect information that you provide us about others.
- Payment information. When you make a purchase, we collect your payment information, including information from your credit card, debit card, cheque, and any authentication information such as a signature.
- Any and all information related to any credit accounts or applications with Morin Supply.



## **PRIVACY POLICY**

## Why we collect your personal information?

We share, collect, use, and disclose your Personal Information provided in order to:

- Establish credit accounts for clients and assess and update credit accounts on an ongoing basis;
- Process orders;
- Provide products and services to clients;
- Marketing Campaign;
- Where necessary, collect amounts outstanding from clients;
- Manage our relationship with clients;
- Respond to questions and requests for information;
- Meet any legal or regulatory requirement including but not limited to accounting and auditing purposes; and
- Such other purposes consistent with the foregoing purposes.

Our use of Personal Information is limited to these purposes. Unless permitted by law, no personal information is collected, used, or disclosed without first obtaining the consent of the individual. The method of obtaining consent may vary on the circumstances and the sensitivity of the information. Consent may be oral or written, express or implied.

Personal Information is collected, to the extent possible, directly from the individual concerned. However, Morin Supply may collect and use personal information from other sources, including references you have provided, credit bureaus and other groups or companies where collection is necessary for the purposes described above.

# With whom your personal information may be shared?

We may disclose your Personal Information to organizations or individuals that perform services on our behalf. Using contractual or other arrangements, we ensure that agents, contractors, or third-party service providers, who may receive Personal Information in the course of providing services to Morin Supply or any successor to all or part of your business, agree to use and hold such information solely for the purposes indicated by Morin Supply.

If you apply for credit with Morin Supply any Personal Information you provide may also be disclosed and shared with credit reporting agencies, credit bureaus or to any person or corporation with whom you have or propose to have financial relations.

Please note that there are circumstances where the use and/or disclosure of Personal Information may be justified or permitted or where we are obliged to disclose information *without* consent. Such circumstances may include:

- Where required by law or by order or requirement of a court, administrative agency or other governmental tribunal;
- Where we believe, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety, or property of an identifiable person or group;
- Where it is necessary to establish or collect monies owing to Morin Supply;



- Where it is necessary to permit us to pursue available remedies or limit any damages that Morin Supply May sustain;
- Where the information is public. Where obliged or permitted to disclose information without consent, we will not disclose more information than is required.

#### Accuracy of your personal information

Morin Supply endeavours to ensure that any personal information provided and in our possession is as accurate, current, and complete as necessary for its intended use. Morin Supply relies on our clients to keep their personal information accurate, complete, and up to date. If Morin Supply becomes aware that personal information is inaccurate, incomplete, or out of date Morin Supply will revise the personal information and, if necessary, use best efforts to inform third parties which were provided with inaccurate information so that those third parties may also correct their records. Should you wish to update or correct any inaccuracies in your personal information in our records please contact the above-named Privacy Officer.

### How long we retain your personal information?

Morin Supply keeps personal information only as long as is required for the reason(s) it was collected or as required by law. The length of time Morin Supply retains information varies, depending on the product or service and the nature of the information. This period may extend beyond the end of your relationship with Morin Supply, but it will be only for so long as it is necessary for Morin Supply to have sufficient information to respond to any issues that may arise at a later date. When personal information is no longer required for Morin Supply purposes, it will be destroyed, deleted, erased, or converted into an anonymous form.

#### How we protect your personal information?

Morin Supply endeavour to maintain adequate physical, procedural, and technical security with respect to our offices and information storage facilities to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information.

We further protect Personal Information by restricting access to it to those employees that the management of Morin Supply. has determined need to know that information in order for Morin Supply to provide our services.

If an employee misuses Personal Information, this will be considered a serious offence for which disciplinary action may be taken, up to and including termination of employment. If any individual or organization misuses personal information – provided for the purpose of providing services to or for Morin Supply. – this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between Morin Supply and that individual or organization. Any and all consequences of such actions are at the full and complete discretion of Morin Supply.

### Access to your personal information

Morin Supply permits the reasonable right of access and review of Personal Information held by us about an individual to ensure that it is accurate.



## **PRIVACY POLICY**

If an individual believes any Personal Information concerning him or her is not correct, that person may request an update of that information by sending a request to the person named as the Privacy Officer. We reserve the right not to change any Personal Information but will append any alternative text the individual concerned believes appropriate.

There may be times when Morin Supply is unable to fulfill your request. Morin Supply reserves the right to decline access to Personal Information in specific situations including but not limited to where the information requested:

- Would disclose (i) personal information, including opinions, about another individual or about a deceased individual; or (ii) trade secrets or other business confidential information that may harm Morin Supply or the competitive position of a third party or interfere with contractual or other negotiations of Morin Supply or a third-party;
- Is subject to solicitor-client or litigation privilege;
- Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the information;
- Does not exist, is not held, or cannot be found;
- Could reasonably result in (i) serious harm to the treatment or recovery of the individual concerned, (ii) serious emotional harm to the individual or another individual, or (iii) serious bodily harm to another individual;
- May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by law to perform such functions;
- Any other grounds under applicable legislation.

Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure. Where information will be disclosed, we will endeavor to provide the information in question within a reasonable time and no later than 30 days following the request.

Morin Supply will not respond to repetitious or vexatious requests for access. In determining whether a request is repetitious or vexatious, Morin Supply will consider such factors as the frequency with which information is updated, the purpose for which the information is used, and the nature of the information.

To guard against fraudulent requests for access, Morin Supply will require sufficient information to allow us to confirm the identity of the person making the request before granting access or making corrections.

# Amendment of our practices and this policy

This Policy Statement is in effect as of January 14, 2004 and reviewed as of April 29<sup>th</sup>, 2021 We will from time-to-time review and revise our privacy practices and this Policy Statement. In the event of any material change, an appropriate notice will be communicated to clients and others in an appropriate manner. Policy changes will apply to the information collected from the date of the revised Policy Statement as well as to existing information held by Morin. Supply.