

PRIVACY POLICY

Emco Corporation and its divisions, business units, affiliates and subsidiaries (collectively "Emco"), respects and values the privacy of every individual who visits our website. We take great measures to ensure the privacy and confidentiality of personal information.

Emco, as a leading distributor and manufacturer of building materials for the residential, commercial and industrial construction markets, must collect personal information from employees, customers or other individuals in order to conduct its business, maintain records, and provide benefits and services to these parties. The collection, use and disclosure of such personal information will be governed by this Privacy Policy. This Privacy Policy does not apply to information that is exempted from the definition of "personal information" in applicable privacy statutes.

By submitting personal information to Emco through this website or otherwise, you agree that Emco 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 collection, uses and disclosures of personal information at any time by making a written request to the Emco profit center with which you do business or Emco's Chief Privacy Officer. If you refuse or withdraw your consent, Emco may not be able to provide you or continue to provide you with products and services or may be unable to process returns, exchanges or refunds. If you wish to withdraw your consent you may have to provide identification acceptable to Emco.

If you provide Emco with personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable Emco to collect, use and disclose such personal information.

Emco may collect personal information from you in order to conduct its business, maintain records, and provide benefits and services to you, including when you:

- Purchase, order, return or exchange any of our products and services
- Request a quote or special orders for or information about any of our products and services
- Request delivery, warranty or repair services
- Make a credit application
- Contact an employee at one of our profit centers
- Visit the emcoltd.com website
- Enter into a contest or respond to one of our surveys
- Provide us with comments or suggestions
- Apply for a job

- Are injured on, or suffer or cause property damage on, Emco's premises.

Emco may use personal information in order to conduct its business, maintain records, and provide benefits and services to you, including to:

- Identify customers, suppliers and others with whom it does business and to establish and maintain a relationship with them
- Provide customers with ongoing service, including to process orders, to ensure proper delivery and to better assist customers when they visit or call us
- Improve our product and service offerings
- Provide Emco's customers with information about other Emco products and services that may be of interest to them
- Protect against error and fraud
- Comply with legal and audit requirements
- Consider your job application
- Create statistics to further Emco's business interests (these statistics do not contain any information that could potentially identify any individual customer, supplier or others with whom Emco does business)

Emco may disclose personal information in order to conduct its business, maintain records, and provide benefits and services to you, including in the following circumstances:

- In response to a search warrant or other legally valid inquiry or order, or, to an investigative body in the case of a breach of an agreement or contravention of law
- To assist us in collecting any debt owed by you
- Some products and services that are provided through Emco (such as extended warranties) may be provided by third parties in cooperation with Emco. In order to provide you with the products or services that you request from us, we may have to transfer information about you to these third parties
- Use of certain third party products to purchase products or services from Emco (such as a credit card not issued by Emco) may require us to provide your personal information to the provider of the third party product in order to process the transaction
- In the event that all or part of Emco's assets are sold or financed, or upon merger between Emco and another commercial entity, personal information in the possession of Emco may be disclosed to the lender, purchaser or merger partner, provided such personal information will be used by all parties in strict compliance with the Emco Privacy Policy

Should Emco transfer personal information to third parties for processing, an agreement containing appropriate privacy protection mechanisms will be put in place. Emco will not trade, rent or sell your personal information to any third party unless we tell you about it and obtain your consent.

Principles

The collection, use and disclosure of personal information will also be governed by the following principles:

Accountability

The Vice-President, General Counsel will be the Chief Privacy Officer and will oversee the administration of this policy and the development of information gathering and handling practices.

Openness

Individuals from whom information is collected will be advised that Emco has policies and practices in place to securely manage such information.

Purpose of Collection

The specific purposes for which personal information is collected and used will be clearly identified and explained, in writing where possible, to the individual at or before the time the information is collected.

Obtaining Consent

Your informed consent, in writing where possible, is required for the collection, use, or disclosure of personal information. There are limited circumstances where consent may not be possible and the Chief Privacy Officer will be consulted prior to the collection, use or disclosure of the personal information of an individual without their consent. A new consent will be obtained from you if the personal information is to be used for a purpose other than that for which it was originally collected. You are entitled to withdraw your consent at any time, and, with limited exceptions, this will prohibit us from making any further use of the information.

Limiting Collection

The collection of personal information will be limited to that which is necessary for the specific purposes identified. Information will be collected by clear, fair and open means.

Limiting Use, Disclosure, and Retention

Personal information will not be used or disclosed for purposes other than those for which it was collected except with the consent of the individual or as required by law.

Personal information must be retained only as long as necessary for the fulfillment of those purposes, or as required by law, and thereafter destroyed in a secure manner ensuring the confidentiality of the personal information.

Accuracy

Personal information, and any disclosure of such information, will be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.

Security

Personal information, regardless of the format in which it is held, will be protected by adequate security safeguards, including physical measures, technological tools and organizational controls, to protect against loss, theft or unauthorized access. Access to personal information will be permitted strictly on a "need to know" basis.

Access

Upon request, and no later than thirty days thereafter, an individual will be informed of the existence, use, and disclosure of his or her personal information and will be given access to that information, except in some limited circumstances. You may update or correct any of your personal information that Emco has in its possession by making a written request to the Emco profit center in which you do business or to the Chief Privacy Officer. You may be asked to provide identification acceptable to Emco and proof acceptable to Emco of the veracity of the requested update or correction. The Chief Privacy Officer will be advised of all such challenges.

Recourse

You will be able to address any complaint concerning compliance with the above principles to the Chief Privacy Officer. The Chief Privacy Officer will initiate an investigation into the complaint, notify you of the outcome of the investigation, and correct any compliance problems identified.

Changes to the Privacy Policy

Emco 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 website and make such revised policy and changes available upon request to the Emco Chief Privacy Officer.

Contact Information for the Chief Privacy Officer

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