

PRIVACY POLICY

Privacy

Apex Aluminum Extrusions Ltd. (“Apex”) recognizes that the proper management of personal information is very important. Apex is committed to providing our customers and suppliers with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our customers and suppliers, protecting their personal information is one of our highest priorities.

While we have always respected our customers’ and suppliers’ privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia’s *Personal Information Protection Act* (“PIPA”). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our customers and suppliers of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Privacy Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting customers’ and suppliers’ personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our customers’ and suppliers’ personal information and allowing our customers and suppliers to request access to, and correction of, their personal information.

Accordingly, in line with Apex’s Privacy Policy, all personal information will be handled in the following manner:

1. Collection of Personal Information

Apex will collect, in a fair and lawful manner, only such personal information as is necessary, and will ensure that the use of such information is restricted.

2. Personal Information Use

Personal information acquired by Apex may be used in the following ways:

- To provide products or services requested by the customer, including product sales, repair and replacement and catalogue distribution (personal information includes all information necessary to understand the requirements of a customer, such as customer purchase history and customer delivery status);
- To enable response to customer requests, including customer inquiry history (and the collection of customer inquiries for the purpose of improving Apex’s responsiveness);
- As a reference to determine customer requirements for products, planning, development, advertisement and sales activities of Apex (this personal information will include customer satisfaction survey and customer inquiry history);
- To send information about Apex as well as its products or other items such as catalogs, brochures, information on new products or any other information that Apex considers to be of interest to the customer;
- To develop and maintain relations with business partners and related entities;
- As a reference in the recruitment of an individual where the personal information is provided by an inquirer or an applicant to Apex;
- As defined by PIPA and other applicable laws and regulations;
- The acquired personal information may be processed and used as statistical data, provided that particular individual cannot be identified.

3. Provision of Personal Information

Provision of Personal Information to Third Parties

Acquired personal information shall not be disclosed to third parties except as listed below:

- With prior consent;
- Where authorized by the PIPA or any other relevant laws and regulations;
- If Apex is ordered or allowed to disclose such information pursuant to a ruling or order of a Court, tribunal, an arbitrator or any judicial or administrative authority having jurisdiction.

Personal Information Sharing

Acquired personal information may be shared and used within Apex and its affiliates in order to attain the usage purposes described in section 2, "Personal Information Use". Personal information that may be shared within the group means: names, addresses, telephone numbers, email addresses, purchase histories, repair histories, inquiry histories and contents and request contents. Apex will observe the Privacy Policy and strictly control the security of personal information.

4. Proper Management of Personal Information

Apex will deploy all necessary and appropriate security measures to prevent the acquired personal information from being leaked or lost. All personal information is gathered and held to secure the safety of the personal information in accordance with Apex's Privacy Policy related to information management. Apex will also offer all training necessary to ensure the proper handling of information to its directors, employees, and other related personnel.

Although every effort is taken to ensure no one else will see or obtain your personal information, complete confidentiality and security is not yet possible on the Internet. Any unencrypted e-mail communication on the Internet is, as with communications via other medium such as cell phones, not secure or confidential and is subject to possible interception, loss and/or alteration. You acknowledge and agree that Apex, its affiliated companies, agents or their respective employees, directors or officers, will not be liable to you or any third party, in any manner whatsoever, for any damage as a result of information transmitted by email to Apex. You assume all risks related to such communications.

5. Inquiries

Inquiries from customers regarding their own personal information, including verification of the purpose of the usage of the personal information, and the giving of opinions or making of complaints with regard to personal information handling, shall be forwarded to our Privacy Officer at legal@vitrum.ca.

6. Improvement

Apex will comply with privacy protection-related Canadian laws and regulations, and will review and improve the contents of this policy to strive constantly towards better privacy protection.

Although our commitment to privacy will not change, Apex may modify, alter or otherwise update this Policy from time to time without notice.