

## **DAP CANADA PRIVACY STATEMENT**

DAP Canada, a division of RPM Canada (“**DAP**”, “**we**”, “**us**” or “**our**”) takes steps to ensure we meet privacy principles and requirements with respect to personal information under applicable Canadian privacy legislation. The purpose of this privacy statement (the “**Privacy Statement**”) is to inform our customers and other individuals we deal with (“**you**” or “**your**”) how we collect, use, disclose and protect your personal information. Personal information is information about an identifiable individual, as more particularly described under applicable privacy legislation. This Privacy Statement applies to our collection, use and disclosure of personal information in Canada. This Privacy Statement does not apply to information about our employees or to information that is not personal information.

### **Personal Information We Collect**

DAP primarily deals with corporate customers and contractors. However, we occasionally deal with sole proprietors, independent contractors or other individual customers and contractors. The information we collect from such individuals may in some circumstances constitute personal information, as for example where an individual provides us with their personal banking information in order to open a customer account with us. Personal information that we, and our agents and representatives, collect includes:

- name, address, email address, telephone number, and other contact information;
- financial information (e.g. bank account);
- credit history;
- credit references;
- credit card information;
- purchase order information;
- inquiries about our products;
- particulars of previous purchases of DAP® and Mono®-brand products by customers;
- expense account information of contractors providing services to us;
- resumes/curriculum vitae that have been submitted to us;
- information you provide when you contact us by any means, including in person, online, by telephone or by mail; and
- such other information we may collect with consent or as permitted or required by law.

### **Use of Personal Information**

DAP generally uses personal information for the following purposes:

- determining eligibility for opening a customer account;
- processing and facilitating delivery of customer orders;
- invoicing customers;
- paying for contracting or other services rendered to us;

- responding to questions about our products or fulfilling requests for sample products;
- unless you opt out, contacting you about new or improved DAP® and Mono®-brand products or product uses and special offers or promotions;
- establishing your eligibility for special offers or promotions;
- unless you opt out, providing your contact particulars to our affiliates or their agents, such as advertising agencies, for their own marketing purposes;
- managing, administering, collecting or otherwise enforcing accounts;
- maintaining business records for reasonable periods, and generally managing and administering our business;
- meeting legal, regulatory, insurance, security and processing requirements;
- to detect and protect against fraud;
- assessing employment candidates; and
- otherwise with consent or as permitted or required by law.

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

DAP does not normally disclose personal information about its customers or contractors to its affiliates or other third parties. However, personal information may be transferred to our affiliates (including those outside of Canada) for internal audit, management, billing or administrative purposes. We may also disclose personal information with your consent to our affiliates or their agents, such as advertising agencies, for their own marketing purposes.

Personal information may also be transferred to outside third party agents or service providers (including those outside of Canada) to provide services to you on our behalf. We take reasonable measures to ensure that your personal information that may be collected, used, disclosed or otherwise processed by these service providers or our affiliates on our behalf is protected and not used or disclosed for purposes other than as directed by DAP, subject to requirements in foreign jurisdictions applicable to those organizations. Note that some of these jurisdictions do not have personal information protection laws equivalent to those in Canada.

Personal information may be used by DAP and disclosed to parties connected with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of DAP or our business or assets, including for the purposes of: permitting such parties to determine whether to proceed or continue with such transaction, and to fulfil reporting, inspection or audit requirements or obligations to such parties. Assignees or successors of DAP or our business or assets may use and disclose your personal information for similar purposes as those described in this Privacy Statement.

DAP may otherwise disclose your personal information as necessary to manage and administer accounts, to enforce debts that you may owe to us, to detect and protect against fraud, to meet legal, regulatory, insurance, audit and security requirements, with your consent, or as permitted or required by law (including as required by applicable Canadian and foreign laws applicable to DAP or our agents and service providers, and including lawful requirements to disclose personal information to government authorities in those countries).

## **Our Website**

DAP maintains the website located at [www.monosealants.ca](http://www.monosealants.ca) and its associated websites, webpages, content and other materials (collectively the “Site”) to provide to you information about DAP, its industry and products.

In general, you may visit the Site without telling DAP who you are or revealing personal information about yourself. However, DAP and companies providing services to or on behalf of DAP may use various technologies, such as cookies and web beacons (1x1 pixels), to collect non-personally identifiable information discernable as a result of your visit. This may include a web surfer’s IP address, cookie information, web pages requested or viewed, date, time and domain type and responses to advertisements. Information gleaned from your browser is automatically received and recorded on server logs. DAP and/or its service providers collecting non-personally identifiable information may use this information to advertise to you. They may also use and disclose non-personally identifiable data derived from our advertising campaigns for reporting purposes, for scheduling and optimization of content delivery and, of course, they may do so if they are required to do so by law. IP addresses also may be collected for system administration to include them in outgoing mail message headers.

You can always set your browser to notify you when you receive a cookie, allowing you to decide whether or not to accept it. At no time can the cookie read any information from your hard drive, and you can remove it from your machine at any time.

### *Links to other websites*

Our Site may contain links to other third party internet websites or resources. When you link to those sites, you leave our Site. DAP has no control over such sites, their content and resources or the business practices or policies of operators of such sites. Your use of other such sites is subject to the terms and conditions of use and privacy policies of those sites. Therefore, please use caution and review the terms and conditions of use and the privacy policies of any sites that you visit to learn more about their information-gathering practices. DAP expressly disclaims all responsibility or liability for the availability or accuracy of such external sites or resources or the content thereon, does not endorse and is not responsible or liable for any advertising, products or other materials on or available from such sites or resources. The inclusion of any link on the Site does not imply that DAP endorses the linked site or that DAP is affiliated with or associated with its operators. Your choice to connect to any other site through a link posted on this Site is entirely at your own risk. You further acknowledge and agree that DAP shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with your use of or reliance on any goods, services or materials available on or through any such link, site or resource.

## **Your Consent**

Consent to the collection, use and disclosure of personal information may be given in various ways. Consent can be express (for example, orally, electronically or on a form you may sign describing the intended uses and disclosures of personal information) or implied (for example, when you provide information necessary for a service you have requested). You may provide

your consent in some circumstances where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose, such as by using an “opt out” option provided, if any. Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney). **Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified or described in this Privacy Statement, if applicable, or otherwise at the time of collection.**

You may withdraw your consent to our collection, use and disclosure of personal information at any time, subject to contractual and legal restrictions and reasonable notice. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide certain of our products or services. Note also that where we have provided or are providing services to you, your consent will be valid for so long as necessary to fulfil the purposes described in this Privacy Statement or otherwise at the time of collection, and you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, but not limited to, maintaining reasonable business and transaction records, disclosures to Canadian and foreign government entities as required to comply with laws, and reporting on credit information after credit has been granted, if applicable).

DAP collects, uses and discloses your personal information with your consent, except as permitted or required by law. We may be required or permitted under statute or regulation to collect, use or disclose personal information without your consent, for example to comply with a court order, to comply with local or federal regulations or a legally permitted inquiry by a government agency, or to collect a debt owed to us.

## **Security**

We take reasonable steps to protect your personal information using physical, electronic or procedural security measures appropriate to the sensitivity of the information in our custody or control, which may include safeguards to protect against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Authorized employees, agents and mandataries of DAP who require access to your personal information in order to fulfil their job requirements will have access to your personal information.

## **Access, Correction and Contacting Us**

DAP may establish and maintain a file of your personal information for the purposes described above, which will be accessible at 475 Finchdene Sq., Unit #5, Toronto, Ontario, M1X 1B7.

If you wish to request access or correction of your personal information in our custody or control, you may write us at the above address, attention Privacy Officer. Your right to access or correct your personal information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections. If you wish to make inquiries or complaints or have other concerns about our personal information practices, you may write to us as described above.

## **Privacy Statement Changes**

This Privacy Statement may be revised from time to time. If we intend to use or disclose personal information for purposes materially different or not described in this Privacy Statement, we will make reasonable efforts to notify affected individuals in advance, if necessary, including by revising this Privacy Statement. If you are concerned about how your personal information is used, you should contact us as described above or check back at our website periodically at [www.monosealants.ca](http://www.monosealants.ca). to obtain a current copy of this Privacy Statement. We urge you to request and review this Privacy Statement frequently to obtain the current version. Your continued provision of personal information or use of our services following any changes to this Privacy Statement constitutes your acceptance of any such changes.

This Privacy Statement was last modified on **December 2010**