

# EXTERNAL PRIVACY POLICY

***This Policy was last updated December 9, 2022.***

## INTRODUCTION

This External Privacy Policy is to let you know how South Essex Fabricating Inc. (“SEF”) respects your privacy. We may update this External Privacy Policy from time to time and encourage you to refer back to it regularly.

## PRIVACY COMPLIANCE

All of our privacy related practices have been designed to comply with or exceed applicable privacy legislation, specifically, the *Canada Personal Information Protection and Electronic Documents Act*.

## HOW DO WE COLLECT PERSONAL INFORMATION?

Generally, we collect personal information about you directly from you. Sometimes we collect Personal Information by recording how you interact with us, for example, by way of using Google Analytics in connection with our website or by way of video surveillance at our Property.

## WHAT PERSONAL INFORMATION DO WE COLLECT, USE AND DISCLOSE AND WHY?

We limit the Personal Information that we collect about you to that which is necessary for our purposes as outlined in this External Privacy Policy. Further, we also only use and disclose your personal information for those purposes. If the personal information we require is collected for a reason other than as outlined in this External Privacy Policy or if a new purpose arises, we will seek your further consent.

SEF collects, uses and discloses the following personal information for the purposes described below.

### I. Property Visitors

#### (a) Personal Information collected, used and disclosed by SEF:

- Sign-In and Sign-Out Sheet: Each visitor must fill out their name, the date, their time in and out of the Property and provide their signature.
- Video Surveillance: There are cameras at the main entrance to view visitors prior to granting them access to the facility and throughout the public areas of the facility.

There are no cameras where an individual would have a reasonable expectation of privacy.

- Photographs: SEF will occasionally take pictures of visitors.

(b) Purposes:

- Sign-In and Sign-Out Sheet. SEF collects, uses and discloses Property visitor information on the sign-in and sign-out sheet for the following purposes:
  - (i) Safety and security, including without limitation preventing theft and other illegal or unsafe activity.
  - (ii) Accurate record keeping and evidence gathering in the event of an incident at the Property requiring an investigation.
  - (iii) Marketing, by posting the name alongside the photograph of the Individual on SEF's social media forums (including Facebook and Instagram accounts) and/or on SEF's website.
  - (iv) Any other purposes required or permitted by law.
- Video Surveillance. SEF collects, uses and discloses video surveillance of its visitors for the following purposes:
  - (i) Safety and security, including without limitation preventing unauthorized access to the Property, theft and other illegal or unsafe activity on the Property.
  - (ii) Accurate record keeping and evidence gathering in the event of an incident at the Property requiring an investigation.
  - (iii) Monitor machinery on the Property.
  - (iv) Any other purposes required or permitted by law.
- Photographs. SEF collects, uses and discloses photographs of its visitors for the following purposes:
  - (i) Marketing by posting the photograph on SEF's social media forums (including Facebook and Instagram) and/or on SEF's website.
  - (ii) Employee engagement.
  - (iii) Any other purposes required or permitted by law.

## II. Prospective Employees

The personal information of prospective employees is considered confidential and as such will be shared only as required and with those who have a need to have access to such information. The personal information of prospective employees is collected for the purposes of:

- (a) Fulfilling SEF's legal obligations and complying with applicable law, including the Ontario *Employment Standards Act, 2000*.
- (b) Identifying potential suitable employees.
- (c) Verifying identity and preventing fraud.
- (d) Verifying qualifications.
- (e) Assessing employment suitability.
- (f) Statistical human resources reporting.
- (g) Any other purposes permitted by law

SEF will retain the personal information of prospective employees for at least the length of the recruitment period of the applicable position. SEF may retain such information after the applicable recruitment period ends in the event it wishes to interview the candidate for another position. The personal information of prospective employees will be destroyed at the individual's request by contacting SEF's Privacy Officer.

### III. Website Visitors

(a) Personal Information collected, used and disclosed by SEF:

- Browser and Device Information.
- Approximate Age and Geolocation.
- Gender.
- Interests of the Individual.

(b) Purposes:

- Helping to navigate and interact with SEF's website.
- Monitoring website use, traffic patterns and other aspects including such monitoring as is undertaken through Google Analytics.
- Improving the website.
- Responding to enquiries.
- Hosting web-based forums.
- Evaluating, planning, administering and managing SEF's operations.
- Marketing.
- Any other purposes required or permitted by law.

We assure you that in all cases, we do not sell or rent personal information.

#### **WHAT WE DO TO PROTECT PRIVACY**

We are responsible for the personal information within our control. We have established policies and procedures, specifically designed to protect personal information from theft, loss, unauthorized use, disclosure, copying, modification or disposal. We educate our staff about these policies and procedures and monitor compliance on a regular basis.

## YOUR CONTROL OVER YOUR OWN PERSONAL INFORMATION

When you or someone you have authorized provides us with your personal information, you are consenting to SEF's use and disclosure of that personal information for the purposes outlined in this External Privacy Policy.

You can change your consent preferences or withdraw your consent for the collection, use and disclosure of any or all of your personal information, at any time (see contact information below). It is important to note however that when you change or withdraw your consent, it will not have a retroactive effect; it may have implications to you and it will not affect the collection, use and disclosure of personal information where such collection use and disclosure is permitted or required by law without consent.

You may, subject to a few limited legal exceptions, access your personal information. If any inaccuracies are noted, you can request that we correct those inaccuracies. Please use our Personal Information Access / Correction Form for any of these purposes.

## CONTACT US

We are committed to providing you with understandable and easily available information about our privacy policies and procedures. We encourage you to contact us with any questions you might have. You can reach our Privacy Officer as follows:

- By telephone at: 519.322.5995
- By email at: [privacy@southsx.com](mailto:privacy@southsx.com)
- Or send us a letter to: South Essex Fabricating Inc.  
4 Seneca Road  
Leamington, ON, N8H 5H7  
Attention: Privacy Officer

## CONTACTING PRIVACY COMMISSIONER OF CANADA

We encourage you to let us try any resolve any privacy concerns that you may have. However, you also have the right to complain about any violation of your privacy rights to Office of the Privacy Commissioner of Canada who can be reached at:

30 Victoria Street  
Gatineau, QC, K1A 1H3

Tel: (819) 994-54443 or (800) 282-1376

Website:

<https://www.priv.gc.ca/en/contact-the-opc/>

