

Rodenstock Canada Inc. Privacy Code

Rodenstock Canada Inc. ("Rodenstock") is committed to the protection of the personal information of its customers, employees and other individuals. Rodenstock follows the privacy code set out below. In this Code, "Personal Information" means information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization.

Principle 1 - Accountability

Rodenstock is responsible for all Personal Information under its control.

Accountability for our compliance with this Code rests with Jeremy Carvalho, our Privacy Officer, even though other individuals within Rodenstock have responsibility for the day-to-day collection and processing of Personal Information. Other individuals within Rodenstock may be delegated to act on behalf of the Privacy Officer.

We are responsible for Personal Information in our possession or custody, including information that has been transferred to a third party for processing. We will use contractual or other means to provide a comparable level of protection when the information is being processed by a third party, and will take reasonable steps, when communicating Personal Information to third parties, to ensure that it will not be used for purposes not relevant to those for which it was collected without the consent of the individual concerned, except where required or permitted by law.

Principle 2 - Identifying Purposes

The purposes for which Personal Information is collected shall be identified and documented by Rodenstock at or before the time of collection. These purposes will be limited to those related to our business and which a reasonable person would consider appropriate in the circumstances. Rodenstock, its assignees, credit/consumer reporting agencies, financial institutions and their respective affiliates, agents and contractors collect, use, and disclose Personal Information for the following reasons: to provide products and services to customers; to evaluate customers' financial status and eligibility for credit; for contract management and administration; to establish a customer relationship and to communicate with customers; to develop, implement, market, and manage products and services for customers; to assist in law enforcement purposes, to collect unpaid debts, for credit reporting and rating purposes; to protect, manage and promote their business interests and activities; to meet personnel and supplier requirements; to provide information to customers on other products and services which may be available; and otherwise as required or permitted by law.

We will make a reasonable effort to specify the identified purposes to the individual from whom the Personal Information is collected at or before the time of collection. This may be done either orally, electronically or in writing.

If Personal Information we have collected is to be used or communicated for a purpose not previously identified, we will identify and document this purpose before such use or communication, and obtain consent, except as required or permitted by law.

Principle 3 - Consent

Personal Information will only be collected, used, or disclosed with the knowledge and consent of the individual. However, in certain circumstances, as required or permitted by law, Rodenstock may collect, use or disclose Personal Information without the knowledge or consent of the individual. These circumstances may include: where collection or use is clearly in the interests of the individual and consent cannot be obtained in a timely way; to act in respect to an emergency that threatens the life, health or security of an individual; where Personal Information is publicly available as defined by regulation; where collection with knowledge or consent might compromise the availability or accuracy of the information and the collection relates to investigation of a breach of agreement or contravention of law; for debt collection; or to comply with a subpoena, warrant or court order.

Typically, we will seek consent for the use or disclosure of information at the time of collection. In certain circumstances, we may seek consent after the information has been collected but before use (for example, where we want to use information for a purpose not previously identified).

We will not, as a condition of the supply of a product or service, require an individual to consent to the collection, use, or disclosure of Personal Information beyond that required to fulfil the explicitly specified and legitimate purposes.

The form of consent, including whether it is express or implied, or oral or written, may vary depending upon the circumstances and the type of information, including the sensitivity of the information and the reasonable expectations of the individual.

An individual can withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. We will inform the individual of any implications of such withdrawal.

Principle 4 - Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by Rodenstock. Information shall be collected by fair and lawful means.

Principle 5 - 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 or permitted by law. Personal Information will be retained only as long as necessary to fulfil the purposes for which consent was obtained or as required or permitted by law. Thereafter, the Personal Information will be destroyed, erased, or made anonymous.

Personal Information which has been used to make a decision about an individual will be retained long enough to allow the individual access to the information after the decision has been made, and, in the event of an access request or a challenge, long enough to exhaust any recourse an individual may have under the law.

Principle 6 - Accuracy

Rodenstock will use its best efforts to ensure that Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. Rodenstock expects the assistance of the individuals concerned in keeping Personal Information accurate, complete and up-to-date.

Information shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about an individual.

Personal information that is used on an ongoing basis, including information that is disclosed to third parties, will generally be accurate and up-to-date, unless limits to the requirement for accuracy are clearly set out.

Principle 7 - Safeguards

Rodenstock will protect Personal Information with safeguards appropriate to the sensitivity of the information, in order to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held.

The methods of protection may include physical measures (such as locked filing cabinets or restricted access to offices), organizational measures (such as security clearances), and technological measures (such as the use of passwords or encryption).

We will make our employees aware of the importance of maintaining the confidentiality of Personal Information, and will use care in the disposal or destruction of Personal Information to prevent unauthorized parties from gaining access to the information.

Principle 8 - Openness

Rodenstock will make readily available to individuals, upon request, specific information about its policies and practices relating to the management of personal information.

This information will include: contact information for our Privacy Officer, who is accountable for our policies and practices and to whom complaints or inquiries can be forwarded; the means of gaining access to Personal Information held by us; a description of the type of Personal Information held by us, including a general account of its use; information that explains our Code and policies; and what Personal Information is made available to related companies.

Principle 9 - Individual Access

Within the limits set by applicable legislation, an individual whose Personal Information is held by Rodenstock has the right to have access to this Personal Information. Upon written request, Rodenstock will inform an individual of the existence, use, and disclosure of his or her Personal Information, and give the individual access to that Personal Information. The individual may request from Rodenstock the correction of inaccurate, incomplete or equivocal Personal Information and cause obsolete or unnecessary information to be deleted.

However, in certain situations, we may refuse a request or not be able to provide access to all the Personal Information we hold about an individual. Exceptions to the access requirement will be limited and specific, as required or permitted by law. Where permitted, the reasons for denying access will be provided to the individual; this will be done upon the individual's request, unless Rodenstock is required by law to provide such written reasons. Exceptions to the grant of an access request may include: information that contains references to other individuals or contains confidential commercial information, where such information cannot be severed from the record; information protected by solicitor-client privilege; information properly collected without the knowledge or consent of the individual for purposes related to investigating a breach of an agreement or a contravention of law; and information generated in the course of a formal dispute resolution process.

In addition, we will provide an account of the use that has been made or is being made of the Personal Information and an account of the third parties to which it has been disclosed.

An individual may be required to provide sufficient information to permit us to provide an account of the existence, use, and disclosure of personal information. The information provided shall only be used for this purpose.

In providing an account of third parties to which we may have disclosed Personal Information about an individual, we will attempt to be as specific as possible. When it is not possible to provide a list of the organizations to which we have actually disclosed Personal Information, we will provide a list of organizations to which we may have disclosed the information.

We will respond to an individual's written request within a reasonable time (generally within 30 days). We will assist any individual who informs us that they need assistance in preparing a request. While our response will typically be provided at no cost to the individual, depending on the nature of the request and the amount of information involved, we reserve the right to impose a cost. In these circumstances, we will inform the individual of the approximate cost to provide the response and proceed upon payment by the individual of the cost. Requested information will be provided or made available in a form that is generally understandable.

If an individual successfully demonstrates the inaccuracy or incompleteness of Personal Information, we will amend the information as required. Where appropriate, the amended information shall be transmitted to third parties having access to the information in question. If a challenge is not resolved to the satisfaction of the individual, we will record the substance of the unresolved challenge. When appropriate, the existence of the unresolved challenge will be transmitted to third parties having access to the information in question.

Principle 10 - Challenging Compliance

Any individual may address a challenge concerning our compliance with this Code to our Privacy Officer.

Rodenstock will inform individuals who make inquiries or lodge complaints of the existence of relevant complaint procedures. We will investigate all written complaints. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.