

**REXEL CANADA ELECTRICAL INC.**

**PRIVACY POLICY**

**[Last updated: September 2023]**

Rexel Canada Electrical Inc., its parent company and its subsidiaries (“**Rexel**” or “**we**”) are committed to maintaining the accuracy, security and privacy of personal information in accordance with applicable legislation. This Policy (the “**Policy**”) applies to all collection and processing of personal information by Rexel from its clients, service providers, and other individuals (“**you**”). The scope of this Policy includes any Rexel mobile application, as well as any website owned and operated by Rexel in Canada (the “**Website**”), regardless of whether it is accessed by smartphone or computer, including <https://www.rexel.ca/> and its subdomains.

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**CONSENT**

**BY SUBMITTING PERSONAL INFORMATION TO REXEL OR ITS AGENTS, YOU AGREE THAT WE 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 of the identified purposes at any time by contacting the Chief Privacy Officer of Rexel as indicated below. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you.**

**1. What personal information do we collect?**

For the purposes of this Policy, personal information means information about an identifiable individual, and includes information that, when combined with other information, may become information about an identifiable individual. Personal information does not include information that has been modified or sanitized such that it can no longer be used to directly or indirectly identify an individual (i.e., anonymous information).

We may collect, use, store and transfer the following categories of personal information about you:

- a) **Identity personal information** includes first name, last name, preferred name, and title.
- b) **Contact personal information** includes email, address, postal code, and telephone numbers.
- c) **Order history information** includes such as the names and contact information used to place an order, as well as information about the products you are interested in.
- d) **Financial information** includes information related to the payment method used to place an online order, if applicable.
- e) **Technical personal information** includes internet protocol (IP) address and geolocation information, **browser language**, cookies and other technology on the devices you use to access this Website.
- f) **Internet activity information** includes browsing history, search history, and interactions with our Website and online advertisements.
- g) **Career profile personal information** includes your online recruitment service password, how you heard about us, who referred you, whether you are a Rexel employee, your work authorization status in Canada, your resume, and other information that you choose to add to your profile.

If you provide Rexel with personal information of another individual, you represent that you have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

By providing us with this personal information, sending us an e-mail, visiting a Website or using our mobile application, you are communicating with us electronically. You consent to receive non-commercial electronic communications from us via the Internet, by e-mail or by posting notices on any Website or mobile application in accordance with the Policy.

## **2. How do we collect your personal information collected?**

We use different methods to collect personal information from and about you including through:

### **(a) Direct interactions.**

You may give us your personal information by corresponding with us. This includes personal information you provide when you:

- i. Sign-up for an online recruitment service user account and update such user account;
- ii. Contact us through the form on our Website; and
- iii. Contact us by any means for any other reason and voluntarily provide us with your personal information.

To access the online recruitment service of the Website, you may be required to create a user account by submitting your email address and to create an online recruitment service password. In submitting personal information on our Website, you are prohibited from impersonating another individual. Any user account must be opened using real names and other requested information.

### **(b) Indirect interactions.**

We collect certain personal information about you indirectly from service providers of ours with whom you also do business. This is the case when we receive your application for a job vacancy through a recruitment agency, or when we obtain your contact and identity information for marketing purposes from a third party. Any indirect collection of your information is done in accordance with this Policy, any privacy policy of the service provider in question, and in accordance with applicable laws.

**(c) Automated technologies or interactions.**

As you interact with our Website, we will automatically collect technical personal information and internet activity information about your equipment and browsing actions and patterns. We collect this information by using cookies, pixels, server logs and other similar technologies. We may also receive technical personal information about you if you visit other websites employing our cookies.

**3. Why do we collect and use your personal information?**

We may use the information collected for the following purposes:

Purpose	Description	Type of personal information
To provide you with the product, information or service you requested	If you are a customer, we use your name, telephone number and address (postal and/or e-mail) to provide you with the product, information or service you requested and to follow up with you about the transaction (e.g. send an invoice, etc.).	<ul style="list-style-type: none"> <li>• Personal identity information</li> <li>• Personal contact information</li> <li>• Order history</li> <li>• Financial information</li> </ul>
To process a payment	Your credit card number, debit card number or banking information for identification purposes and pre-authorized payments is used only to process payments and offer payment options - not for marketing purposes.	<ul style="list-style-type: none"> <li>• Personal identity information</li> <li>• Personal contact information</li> <li>• Financial information</li> </ul>
To send you information about products and services	Occasionally and in compliance with applicable legislation, we may send you information about our products and services, including by means of e-mail, text message (SMS) and push notifications on your mobile device.	<ul style="list-style-type: none"> <li>• Personal identity information</li> <li>• Personal contact information</li> <li>• Technical personal information</li> <li>• Internet activity information</li> <li>• Order history information</li> </ul>
Other Purposes	<p>Occasionally, we may also use your personal information for the following purposes:</p> <ul style="list-style-type: none"> <li>• to detect and protect Rexel and other third parties against error, fraud, theft and other unlawful activity and to verify compliance with Rexel's policies and contractual obligations;</li> <li>• to understand and respond to the needs and preferences of customers, suppliers and other third parties, including to communicate with such parties and to conduct surveys, research and evaluations;</li> <li>• to participate in commercial transactions, including</li> </ul>	<ul style="list-style-type: none"> <li>• Personal identity information</li> <li>• Personal contact information</li> <li>• Order history information</li> <li>• Financial information</li> <li>• Technical personal information</li> <li>• Internet activity information</li> </ul>

	<p>the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposition, securitization or financing involving Rexel;</p> <ul style="list-style-type: none"> <li>• as permitted or required by law; and</li> <li>• for any other purpose to which you consent.</li> </ul>	
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#### **4. Disclosure of personal information**

We may disclose your personal information to the following third parties in the following cases:

##### **a) Disclosure to service providers**

We may disclose your personal information to other companies that perform services on our behalf, including financial institutions, securitization agents, external auditors or payment processors. In addition, we may disclose your personal information to a company or person retained by Rexel to evaluate your creditworthiness or to collect outstanding debts on an account or to our auditors. We use third-party vendors to perform certain services, such as sending e-mails and push notifications. In such cases, we share your data with our business partners to perform these actions. Our business partners agree to comply with our data privacy requirements. We will only provide these companies with the information required to provide the service, and they are prohibited from using this information for any other purpose

##### **b) Disclosure to affiliated companies**

We may disclose your personal information to any company or business entity within the Rexel group (i.e. Rexel Canada Electrical Inc. and its subsidiaries and affiliates) to better serve you and to provide you with information about our affiliates' products and services.

##### **c) Disclosure to business partners**

Occasionally, we may pass on our customer list to other carefully selected companies who wish to let you know about a product or service that may be of interest to you. The material sent to you is reviewed by us before names and addresses (including e-mail addresses) are given out, to ensure that the companies are reputable and that the material they wish to pass on is appropriate and not misleading.

##### **d) Disclosure in connection with commercial transactions**

Rexel may be involved in the sale or transfer of some or all of its operations. As part of these activities, Rexel may disclose your personal information to the acquiring company, but we will nonetheless require the acquiring company to maintain the confidentiality of your personal information in a manner consistent with this Privacy Policy.

##### **e) Law enforcement and legal disclosure**

Rexel may disclose your personal information to a government institution that has asserted its lawful authority to obtain the information or if Rexel has reasonable grounds to believe the information could be useful in the investigation of unlawful activity or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with court rules regarding the production of records and

information, or to Rexel's legal counsel.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law.

By providing us with personal information, you acknowledge and agree that your personal information may be transferred to other jurisdictions for processing and storage, including but not limited to servers located across Canada and outside of Canada. Where required by applicable laws, we conduct Privacy Impact Assessments to evaluate the risk associated with the transfer of personal information outside your province of residence. Please note that privacy laws in other provinces may diverge from those applicable in your province of residence.

## **5. Storage of personal information**

We will retain your personal information only as long as permitted or necessary under applicable laws and our data retention policies. In certain circumstances, we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymized and de-identified data for legitimate business purposes without informing you or obtaining your consent.

## **6. Protection of your personal information**

Your personal information is stored in secured locations and on servers controlled by Rexel or its service providers, located either at our offices or at the offices of our service providers. Your personal information may be transferred to, stored, and processed in a country that is not regarded as providing the same level of protection for personal information as the laws of your home country, and may be available to the government of those countries under a lawful order made in those countries.

To help protect the confidentiality of your personal information, Rexel employs administrative and technological safeguards appropriate to the sensitivity of your personal information. Where personal information is sent to a third party for processing, we obtain a commitment from such third party, that all customer information is kept secure. We operate secure data networks protected by industry standard firewall and password protection systems.

## **7. E-Mail Communications**

Occasionally, we may send marketing or promotional e-mail communications to you in accordance with applicable law with information that may be useful, including information about the services of Rexel and other third parties with whom we have a relationship. We will not send you any e-mail communications pursuant to this Privacy Policy unless you have consented for us to do so in accordance with applicable law, and we will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any e-mails from Rexel.

## **8. Your Legal Rights**

Subject to certain exceptions as permitted by law, you have the following rights with respect to your personal information held by us:

(a) Your right of access

You have the right to access your personal information held by us and to receive a general account of our use of that personal information. Upon receipt of a written request from you, we will provide you with a copy of your personal information, although in certain limited circumstances we may not be able to make all relevant personal information available to you, for example, where that personal information also relates to another individual. In such circumstances, we will, upon request, provide you with the reasons for such refusal. We will endeavor to process all requests for access to personal information in a timely manner.

(b) Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. Where appropriate, such amended personal information will be provided to the parties to whom we are authorized to disclose your personal information. We will endeavour to deal with all requests for rectification of personal information in a timely manner.

(c) Your right to Personal Information portability

You may have the right, in certain circumstances, to obtain personal information you have provided us (in a structured, commonly used, and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

(d) Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your Personal Information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

## **9. Mobile Push Notifications**

If you are a user of our mobile Apps, by opting in to receive Push Notifications you may receive transaction notifications such as: order confirmations; status updates; delivery notifications. Push notifications or alerts to your mobile device may be sent even when you are not logged into the App. We use push notifications to send you transaction updates, urgent business notices and marketing offers. At any time, you can manage your push notification preferences or deactivate these notifications by turning them off in your mobile device settings. If you choose not to receive push notifications, you may still receive In-App notifications within the App.

You may opt-in or opt-out to receiving push notifications directly in your mobile phone by going to your device “Settings”, then selecting “Notifications” to edit these options for any app on your

mobile device. Different device configurations or updates may affect how these settings work. Your choice to opt-in or opt-out of notifications from the App will not affect ads or notifications from any other organization.

## 10. Privacy and our Website

- (a) **Cookies** - When an individual visitor accesses a Rexel Website or mobile application, we may use a browser feature called a 'cookie' to collect Website or mobile application information, user preferences and user data such as the type of Internet browser and operating system the visitor uses, the domain name of the website from which the visitor came and which the visitor visits after visiting our Website, date and duration of the visit, number of visits, average time spent on our Website or mobile application and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies the visitor's browser, but not the visitor, to our computers each time our Website or mobile application is visited. Unless a visitor specifically informs us (e.g. by registering for an event or sending us correspondence from the Website or mobile application), we will not know who the individual visitors are. In addition to the identified purposes described in our Privacy Policy, we may use this information and share it with other organizations with whom we have a commercial relationship to measure the use of our Website and mobile application, to improve the functionality and content thereof, and to facilitate usage by a visitor. This information may also be used to provide visitors with tailored marketing and help third parties improve their own products and services. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, they may not be able to use some of the features available on our Website or mobile application. To opt out specifically from the use and sharing of this information with Google, visitors may opt out of the *Google Analytics Measurement Program* and *Google AdWords® Remarketing* by accessing the respective following links: <https://tools.google.com/dlpage/gaoptout> and [Google's Ads Preferences Manager](#).
- (b) **Online Communications** – In order to provide our Website and mobile application visitors with a service or information, visitors may voluntarily submit personal information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, participating in a seminar or other event, and participating in contests and surveys. If you are known to Rexel as a registered user of an online service, we may combine and store personal information about your use of our Website and mobile application and the online information you have provided with certain other online and offline information we may have collected.
- (c) **Links** - Our Website and mobile application may contain links to other Websites which are provided as a convenience only. Visitors are advised that other third party websites or mobile applications may have different privacy policies and

practices than Rexel, and Rexel has no responsibility for such third party websites or mobile applications.

## **11. Changes to the Privacy Policy**

Rexel 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 Intranet, Website or mobile application and make such revised policy and changes available upon request to the Rexel Chief Privacy Officer. However, Rexel will obtain the necessary consents required under applicable Privacy Laws if it seeks to collect, use or disclose an individual's personal information for purposes other than those to which consent is obtained unless otherwise required or permitted by law.

## **12. Additional information**

Rexel has appointed the General Counsel as Chief Privacy Officer to oversee compliance with this Privacy Policy and applicable privacy laws. For information on this Policy, Rexel's customers related privacy practices, or to exercise any of your rights under applicable privacy laws, please contact our Chief Privacy Officer as follows:

Chief Privacy Officer,  
505 Locke Street,  
Suite 200  
Ville St-Laurent, Québec  
H4T 1X7  
[e-mail: cpo.cprp@rexel.ca](mailto:cpo.cprp@rexel.ca)