



## 1.0 **PURPOSE**

Silent-Aire Manufacturing Inc is committed to protecting the privacy of our employees, and our customers. As part of this commitment, Silent-Aire has established a privacy program that demonstrates our due diligence to privacy laws.

## 2.0 **SCOPE**

This Privacy Policy governs the principles and the practices that Silent-Aire will follow in order to adhere to the federal, provincial, state, legislative and regulatory requirements concerning the handling and management of personal information. This policy describes how we collect, use, share and secure sensitive information processed by Silent-Aire.

## 3.0 **RECORDS**

This document will be stored and maintained by the Quality Assurance/Control department.

## 4.0 **DEFINITIONS**

Customer – A company who has entered into a business relationship with Silent-Aire for Silent-Aire to manufacture goods or perform a service.

Individual – The person or company whose data Silent-Aire has processed, for example, an employee of Silent-Aire, a Customer, or a person using a Silent-Aire website, service or tool.

Personal Information – Any data element or combination of data elements that enables the identification of an individual, including, but not limited to, name, address, human resources data, personal health information, government identification such as social security number, name, biometric identifier, address, driver's license number, subcontractors, relationships between third party businesses, credit or financial information, or account numbers.

Processed - personal information that is in Silent-Aire's possession or under its control.

## 5.0 **ACCOUNTABILITY**

Silent-Aire, its employees, and contractors take responsibility for personal information in accordance with Silent-Aire policies and standards. Silent-Aire's VP Human Resources is responsible for defining the requirements of this policy and for ensuring compliance with its provisions. The VP Human Resources is responsible for implementing and maintaining appropriate controls and measures to enable compliance. Silent-Aire shall make known, upon request, the identity of the VP Human Resources. Silent-Aire is accountable for personal information it processes, including personal information that has been transferred to a third party to be processed. Contractual requirements will be used to provide a comparable level of protection while information is being processed by a third party on Silent-Aire's behalf.



Silent-Aire trains its employees with respect to its privacy policies and practices.

## 6.0 **NOTICE, CHOICE AND CONSENT**

Silent-Aire provides notice as to the purposes for which personal information is collected, used, retained, and disclosed.

In most cases, customers are responsible for notification of purpose and for obtaining appropriate consent when they collect personal information, and personal information that is transferred to Silent-Aire by our customers to be processed shall be deemed to have been collected with appropriate notification. Silent-Aire assumes no responsibility for obtaining or validating that appropriate consent has been obtained in respect of data transferred to Silent-Aire by organization(s)/customers.

In some cases, Silent-Aire collects personal information directly from the individual for example, when individuals visit a Silent-Aire website, or when individuals sign in as visitors to Silent-Aire facilities. In these cases, Silent-Aire is responsible for obtaining appropriate consent, except where inappropriate or if the collection is required/permitted by law without consent. Where appropriate, Silent-Aire describes any choices available within the services to individuals and obtains appropriate consent. Individuals who seek to vary or withdraw consent that has been obtained by Silent-Aire directly may do in writing in the manner set out in the Enforcement Section of this policy.

Subject to Legal or contractual restrictions, Silent-Aire shall abide by the withdrawal or variation of consent, and shall advise the individual of the consequences of a change in the scope of consent. In cases where consent has been obtained by the customer, the individual will be referred to the customer.

Unless required by law, Silent-Aire shall not use or disclose personal information for any purpose other than the purpose for which it was originally collected without first identifying and documenting the new purpose and obtaining the appropriate consent. Once data has been de-identified, aggregated or summarized it shall no longer be considered personal information, and individuals cannot seek to have their information removed from an aggregated data set, nor is consent for further use required.

## 7.0 **COLLECTION AND USE**

Silent-Aire does not collect data indiscriminately. Silent-Aire collects personal information only for the purposes of providing and promoting the goods and services we offer, and limits use to those purposes, including initiating, maintaining, enhancing, and terminating the employee-employer relationship. Personal information shall be collected by fair and lawful means, and not by misleading or deceiving individuals about the purpose for which information is collected.

Silent-Aire may also collect personal information from other sources, either with the consent of the individual or where permitted or required by law. Examples of indirect sources of personal information include background checks, employers or personal references.



## 8.0 **RETENTION AND DISPOSAL**

Silent-Aire retains personal information only as long as necessary to fulfill the stated purposes or as legally required and thereafter appropriately disposes of such information. Silent-Aire will specify minimum and maximum retention periods for the various records containing personal information.

When personal information is no longer necessary or relevant for the identified purpose or to fulfill a legal or business requirement, it shall be securely destroyed. Silent-Aire will either physically or electronically erase the personal information or make it anonymous in a non-recoverable manner.

## 9.0 **ACCESS**

Unless Silent-Aire is permitted or required by law to prohibit access, Silent-Aire makes personal employee file information available for review and updating, through an access request made to the Human Resources department.

Where applicable, individuals may contact Silent-Aire in the manner set out in the "Enforcement" section of this policy. Silent-Aire responds to requests within the time limit set out by the applicable privacy legislation. Silent-Aire requires sufficient information to authenticate requests for access.

## 10.0 **SHARING**

Silent-Aire does not use or disclose personal information for purposes other than those for which it is collected, unless required by law.

Silent-Aire discloses personal information to third parties only to fulfill the purposes for which it is collected. These services may include, among other things, providing products or services to you or your employer on our behalf, creating or maintaining our databases, researching and analyzing the usage and performance of the application, preparing and distributing communications, responding to inquiries, or as part of our process. If Silent-Aire has knowledge that a third party uses or discloses personal information in an unapproved manner, Silent-Aire takes reasonable steps to prevent or stop the use or disclosure.

Where applicable, to limit or opt out of the disclosure of personal information, individuals should contact Silent-Aire Human Resources department.

When required to provide information in response to a legal enquiry or order and for national security purposes, Silent-Aire exercises reasonable caution to ensure that the order or request is valid and only legally required personal information is disclosed. Under certain circumstances, the law may require that Silent-Aire not notify individuals whose information has been requested by legal order. If not prohibited and where



practical, Silent-Aire notifies individuals that their information has been subject to a legal inquiry.

Silent-Aire does not sell any personal information to third parties for marketing or any other commercial purposes.

## 11.0 **SAFEGUARDS**

Silent-Aire has implemented policies, procedures and practices to protect personal information.

Silent-Aire protects personal information using recognized industry standard security safeguards appropriate to the sensitivity of the information. Silent-Aire reviews its security policies and procedures on a regular basis and updates them as needed to maintain their relevance. Silent-Aire makes reasonable security arrangements to protect personal information in its custody or under its control from and against risks, such as loss or theft, as well as unauthorized access, collection, use, disclosure, copying, modification, disposal and destruction.

The methods of protection include physical measures, organizational measures and technological measures.

Silent-Aire requires all third parties to whom it may transfer personal information as required to perform its services, to maintain adequate security safeguards in compliance with applicable laws and standards to protect personal information.

## 12.0 **QUALITY**

In delivering goods and services, Silent-Aire relies on customers and employees to supply Silent-Aire with accurate, complete and up-to-date information that is relevant to Silent-Aire's delivery of the services. Individuals are asked to review their records on a regular basis and make the appropriate updates or notify us of errors promptly. Silent-Aire makes reasonable efforts to maintain the integrity of the data within its products as necessary to fulfill the purposes for which the information is to be used.

Where Silent-Aire collects information outside of service delivery, Silent-Aire makes reasonable efforts to keep personal information as accurate, complete and up-to-date as is necessary to fulfill the purposes for which the information is to be used. Silent-Aire provides a means for individuals to update or correct the personal information Silent-Aire possesses.

## 13.0 **MONITORING AND ENFORCEMENT**

Individuals may raise concerns or complaints regarding their personal information with Silent-Aire by contacting the Human Resources department.

If an individual files a complaint, Silent-Aire will investigate the matter or suspected failure to comply with this notice or Silent-Aire's Privacy Principles. Silent-Aire will take all appropriate action to remedy any such issues.



If individuals feel that their complaint was not satisfied, they may file a formal complaint, free of charge, with the regulatory bodies below.

In Canada, the Privacy Commissioner of Canada or the Privacy Commissioner in the applicable province

Office of the Privacy Commissioner of Canada  
30 Victoria Street  
Gatineau, Quebec  
K1A 1H3  
Phone: 1-800-282-1376

#### 14.0 **CHANGES TO THIS POLICY**

Silent-Aire may update this privacy policy to reflect changes to our practices and reserves the right to change its policies at its own discretion without notice.

#### 15.0 **NON DISCLOSURE AGREEMENTS WITH OTHER BUSINESSES**

Should a customer, supplier, or other company conducting business with Silent-Aire have specific privacy concerns, the individual may provide Silent-Aire with a Non-Disclosure-Agreement, which will be assessed on a case-by-case basis. Should any terms of the Non-Disclosure-Agreement not be possible to meet, Silent-Aire will discuss the concerns with the individual before commencing any collection or disclosure of information.

#### 16.0 **PHOTOGRAPHY IS PROHIBITED ON OUR PRODUCTION FLOOR**

For privacy reasons, Silent-Aire employees and visitors are prohibited from taking photographs of company facilities, products, or personnel using a camera or any camera functions on their cellular phone without first obtaining express permission from the company.

#### 17.0 **THE USE OF VIDEO FOOTAGE ON SILENT AIRE PROPERTY**

For safety and security reasons, Silent-Aire property is under surveillance via video equipment, and footage is stored for a period of time. By commencing employment with Silent-Aire Manufacturing Inc you agree to be videotaped while within our property. Footage may be reviewed or disclosed to legal authorities in the event of a Safety or Security concern.