

SEMPLÉ GOODER

Roofing Corporation EST. 1947

Feb /2005

CORPORATE PRIVACY POLICY

At Semple-Gooder Roofing Corporation, we recognize the importance of protecting the privacy of personal information collected about you, our customers and prospects. Personal information is any information beyond your name, title, business address or telephone number including your email address and personal references. As part of our commitment to protect this privacy we have adopted a Corporatewide Privacy Policy that guides how we collect, store and use any personal information we may receive about our customers and prospects. Our intent is to (1) balance our legitimate business interests in collecting and using this information against your reasonable expectations of privacy and (2) our Corporate effort to comply with the standards established in Canada by *The Personal Information Protection and Electronic Documents Act* introduced January 1st, 2004.

COLLECTION AND USE OF PERSONAL INFORMATION

The information you do provide to us is done on a completely voluntary basis and is used to process your requests, respond to e-mails and otherwise correspond with you as deemed necessary to provide you with, or improve the quality of, the service or product you requested as well as for billing purposes. When we receive e-mails, the messages are stored within our system so that we may refer to them as needed and properly address questions and concerns. We may, from time to time, use the information you have provided us with to develop and customize products to better meet your needs and preferences, to offer you any future product releases or services that may be of interest to you and to notify you of my Company events. We will only collect this type of personal information to the extent deemed reasonably necessary to serve our legitimate business purposes. In addition we may collect and use Personal Information as follows:

- (1) To determine your financial situation to establish credit for the services requested;
- (2) To allow us to share such information with credit agencies either of do business with or have a relationship with;
- (3) To report, when required, information that may pertain to a returned cheque due to insufficient funds or when collecting a delinquent account and
- (4) To disclose information when we are compelled to do so in a legal proceeding.

Once we have entered a contractual relationship with you, we may be subject to certain legal or contractual obligations that will require us to continue to gather and use the Personal Information provided. Namely, we need to maintain contact records for our personal and business customers primarily for customer service, payment or collection purposes. The sharing of this information, however, is restricted to our employees, agents or affiliates who require it in order to perform their jobs.

DISCLOSURE OF PERSONAL INFORMATION

Your e-mail address and other personal information will be kept confidential and will not be shared, given, rented or sold to any organization or individuals outside our Head and Branch Offices. We will not disclose your personal information unless:

- (1) you have consented to the disclosure;
- (2) the information is publicly known;
- (3) it is necessary to provide you with the product or service you requested, process your requests, improve the quality of our product or service to better serve your needs or to prepare and provide you with billing statements;
- (4) such release is reasonably necessary to enforce or apply the terms of any of our agreements;
- (5) it is necessary to protect our rights, property or safety, or the safety of our users or others;
- (6) we are required to do so in order to comply with any valid legal process, such as a search warrant, subpoena, statute or court order; or

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(7) Semple Gooder Roofing Corporation merges with, is acquired by, or sells some of its assets to any other interest, in which case, the personal information that we may have collected about you may be transferred as part of the transaction.

Except as provided in this Privacy Policy, we will not share or distribute your personal information with any party not mentioned in this Privacy Policy without your consent.

SECURITY OF PERSONAL INFORMATION

We will maintain appropriate safeguards in our physical facilities to ensure the security, integrity and privacy of your personal information. Our employees are obliged to respect your privacy and the confidentiality of your personal information.

Please keep in mind that electronic data transmission by e-mail is not 100% secure. Although we strive to protect your personal information by employing industry-standard encryption technologies, we cannot guarantee the security of any information you disclose online and we will not be liable for personal information that you or third parties send electronically to us that becomes lost, misused or altered.

On our website, like most other commercial websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.

CONTACTING US

At any time, you may request if we have collected or are collecting personal information about you, request a copy of such personal information we have collected, correct any factual errors in your information, request to be moved from our mailing lists and/or request that we purge all information collected about you and stop collecting your information. At the time of the request, we reserve the right to ask that you provide proof of your identity. We also reserve the right to deny your request based on your inability to provide identity proof or any other valid reason which we will provide you with.

If you would like to make any of the above requests or if you have any questions about our privacy policy, we invite you to e-mail us at info@semplegooder.com or send us a postal letter to our Head Office at 1365 Martin Grove Road, Toronto, Ontario, M9W 4X7 Attention: Privacy Officer.

CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Policy from time to time as we modify or expand our services. Therefore we suggest that you refer back to this Privacy Policy periodically in order to understand how we treat any personal information we may receive about you. Your continued use of our website and/or your choice to provide us with personal information constitutes your agreement to any such changes.