

Subject: Privacy Policy (HR 5)		
Revision Date: September 2, 2025		Version: 3

Privacy Policy

Intent

This policy describes the principles by which Canusa Automotive Warehousing Inc. (the "Company") will protect the privacy of personal information. This policy is based on the *Canadian Standards Association (CSA) Model Code for the Protection of Personal Information* and is part of the Company's commitment to ensure all personal information of individuals in its possession is protected and used in accordance with the law.

The privacy of individuals connected with the business, including customers, contractors, and employees, has always been of great importance to the Company. Keeping personal information in strict confidence is a cornerstone of the business. The Company will strive to protect the privacy of personal information, subject to any consent an individual has provided for its use.

Scope

This policy applies to all individuals who work at Canusa Automotive Warehousing Inc., including full-time and part-time employees, temporary employees, contract service providers, all supervisory personnel, managers, officers, and directors. It also applies to any customers, visitors, or other people accessing the Company's property.

Definitions

Personal Information: any information about an identifiable individual, other than the name, title, business address, and business phone number of that individual. Personal information includes such things as an individual's home address, date of birth, and social insurance number (SIN)

Guidelines

The Company is responsible for personal information under its control. The Company will designate one or more Privacy Coordinators, who will be responsible for ensuring the Company's compliance with this policy and applicable privacy legislation. While ultimate accountability for compliance rests with the Privacy Coordinator(s) and senior management, day-to-day compliance is delegated to select staff members throughout the Company, including supervisors who are provided with personal information from their staff.

Identifying the Purposes for which Personal Information is Collected

The Company will identify the reason for which personal information is collected at, or before, the time the data is collected unless such purpose is obvious.

The Company will ensure that the reason(s) for the collection of information and the way(s) in which the information may be used are apparent to the individual. In some cases, the purpose will be apparent from the context of the interaction, and in other circumstances, a verbal or written explanation may be required.

Responsibilities

Employer Responsibilities

- Establish procedures to protect personal information
- Ensure a copy of this policy is available to all individuals in a format that is understandable
- Communicate and provide the Company's policies and procedures to all employees
- Appoint one or more Privacy Coordinators to monitor and regularly review privacy compliance
- Develop processes to receive and respond to inquiries and complaints
- Implement practices to effectively monitor compliance with this policy

Employee Responsibilities

- Take all reasonable measures to protect personal information
- Follow all established policies and procedures with respect to privacy
- Report potential information or privacy breaches

Consent

The Company will obtain consent, either express or implied, for the use or disclosure of personal information at the time the data is collected.

The Company will not, as a condition of the supply of a product or service, unreasonably require an individual to consent to the collection, use, or disclosure of information beyond what is required in the circumstances.

The way in which the Company seeks consent may vary depending on the circumstances and the type of information collected. In determining the method in which consent will be collected, the Company will consider the nature of the information, the intended use, applicable laws, and the type of interaction in which the information is provided.

Consent may be expressed or implied, given orally, electronically, or in writing and provided by an action or inaction. Consent may be given through a legally appointed representative or a legal guardian.

An individual, subject to legal or contractual limitations, may withdraw consent at any time by providing sufficient notice to the Company. Depending on the circumstances, withdrawal of consent may result in the Company becoming unable to provide or continue to provide the individual with certain services, products, or benefits, and the individual will be given notice of the implications within a reasonable amount of time of the withdrawal.

Limits on the Collection of Personal Information

The collection of personal information will be limited to what is necessary for the purposes identified by the Company. At all times, the Company will collect personal information in a fair and lawful manner.

It is possible that the Company may, with the individual's consent, collect and use information about that individual from a third party. For instance, employment references may be checked if an individual is applying for a job.

Limits on the Use, Disclosure, and Retention of Personal Information

Personal information will not be used or disclosed by the Company 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 reasonably necessary to fulfill those purposes or as required by law. When personal information is discarded, it will be done in a manner that is appropriate (e.g. shredding).

Accuracy of Personal Information

The Company will make reasonable efforts to ensure the personal information of individuals is as accurate, complete, and up-to-date as necessary for the purposes for which it is to be used. Personal information will only be updated if necessary for the continued use of the personal information. Once informed that personal information held by the Company about an individual is inaccurate, the information will be verified and updated as soon as possible.

Safeguarding Personal Information

The Company will protect personal information using security safeguards appropriate to the sensitivity of the information. The Company will implement security safeguards that will 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 nature of the safeguards used by the Company will vary depending on the sensitivity of the information that has been collected, the amount, distribution, and format of the information, and the method of storage of the information. A higher level of protection will be used to safeguard more sensitive information.

The methods of protection used by the Company will include:

- Physical measures (e.g. locked filing cabinets and restricted access to offices)
- Administrative measures (e.g. limiting access on a “need-to-know” basis)
- Technological measures (e.g. the use of passwords and encryption)

The Company will ensure that employees with access to personal information are trained in the appropriate protection of data privacy and are aware of the importance of maintaining the confidentiality of personal information.

Individual Access to Personal Information

An individual may submit a written request for details regarding the existence, use, and disclosure of the individual’s personal information. The Company will provide access to such information within a reasonable time upon receipt of the request. In certain limited circumstances, as permitted by law, specific information, such as information that is collected and held in the context of an investigation of the breach of a law or a contract, will not be disclosed to the individual.

An individual may be required to provide sufficient information to verify their identity before the Company is able to provide a summary of the existence, use, and disclosure of personal information.

Upon receipt of the written request, the Company will provide a list of the third-party entities to which personal information about the individual may have been disclosed and the purpose for which the information may have been disclosed.

The Company may charge a reasonable fee to cover the cost of providing such information. The Company will inform the individual of the approximate cost prior to providing the data and will allow the individual the opportunity to withdraw the request.

If an individual successfully demonstrates that the personal information held by the Company is inaccurate or incomplete, the information will be amended as required. The amended information will be transmitted to the appropriate third parties, as necessary.

The Company may decline to provide an individual with access to personal information in accordance with applicable laws. If such a refusal is made, the Company will inform the individual of the reasons why such access has been denied, except when the Company is prohibited from doing so by law.

Complaints and Questions

Complaints and questions regarding the Company’s compliance with this policy may be made in writing to the attention of the Privacy Coordinator(s) at 2290 Scanlan Street, London, Ontario, N5W 6G7 or by email to the Human Resources Department at hr@canusa-apc.com.

The Company has procedures in place to receive and respond to inquiries or complaints about this policy and its practices relating to the handling of personal information.

If an individual is not satisfied with the Company's response to a complaint or is otherwise not satisfied with the Company's policies and practices with respect to its handling of personal information, a complaint may be made to the provincial privacy commissioner of the province, or to the Federal Privacy Commissioner at 112 Kent Street, Ottawa, Ontario, K1A 1H3; or 1-800-282-1376. More information can be obtained at the Federal Privacy Commissioner's website, www.privcom.gc.ca.

Discipline

Employees who fail to adhere to the terms of this policy may be subject to disciplinary action, up to and including termination. The discipline will be determined at the sole discretion of the Company, taking into account the nature of the violation.