

# Privacy Policy

This privacy policy (“**Policy**”) sets out how we, Vallen Canada Inc., collect, use, disclose and protect any information, including personal information (information about an identifiable individual), you give us as you use one of our website(s) or application(s) (collectively referred to as the “**Platform**”).

By using the Platform, you consent to our collecting, using and disclosing of such information in accordance with this Policy, strictly for the purposes stated hereunder and any other purpose that is specified or self-evident at the time any specific information is collected.

If you do not agree with anything in this Policy, you must stop using the Platform.

## 1. INFORMATION WE COLLECT

### 1.1 Automatically collected technical and tracking information

When you use our Platform, we automatically receive certain information concerning the device you are using, such as the internet protocol (IP) address, browser and operating system.

We also automatically collect information through cookies. Please see section 7 for more details.

### 1.2 Information collected upon request

If you purchase something using the Platform, we must collect the information necessary to process, invoice and ship your order and provide customer service. Such information may include:

- Name
- Contact information, including phone numbers and civic and email addresses
- Shipping and billing information, including credit card information.

If you create an account on the Platform, we will collect information as set forth in the account creation form for the purposes of identification and protection of your account.

From time to time, we may also ask for other information to help us better understand the users of our Platform. This allows us to improve our products and services offering as well as the customer experience. You are free to provide this information or not.

## 2. WHAT WE DO WITH THE INFORMATION WE COLLECT

We use the information we collect for the following purposes, depending on the circumstances:

- Processing and invoicing of orders;
- Processing of payments;
- Shipping and delivery or return of a product;
- Technical support and customer service;
- Internal record keeping (including for legal, fiscal and accounting purposes);



- Customization of the experience on the Platform according to personal interests;
- Direct marketing (information about our stores, new products, promotions, events and other updates) in compliance with Canada's anti-spam legislation and regulations;
- To analyse our customer's interests, choices and preferences in order to improve or better market our products and services.

From time to time, we may also use your information to contact you by email, phone, fax or mail for customer surveys and market research purposes. When doing so, we will comply with Canada's anti-spam as well as telemarketing and unwanted call legislation and regulations, as applicable.

Access to personal information is limited to personnel who need the information to perform their duties.

### **3. DIRECT MARKETING**

When you provide information on the Platform, we may ask you if we can use the specific information to send you promotional information about us or third parties we think you may find interesting. Whether you agree or disagree, you can change your mind at any time by writing to or emailing us at [vallenmarketing@vallen.ca](mailto:vallenmarketing@vallen.ca).

### **4. THIRD-PARTIES**

We will disclose personal information only to trusted third parties and to carry out the specific purposes for which it was collected, as stated (or self-evident) in this Policy or at the time of collection.

In particular, we may share personal information with trusted partners or suppliers who act for us for the following purposes:

- To data hosting service providers, to enable us to collect, use, analyze, store, secure or otherwise process information (including personal information) in the course of our activities;
- To physical or electronic mail service providers, to communicate with you;

We may also disclose personal information to comply with applicable laws and regulations, to respond to a subpoena, a search warrant or other lawful request for information we receive, or to protect our legitimate interests or assert our rights. For example, we may disclose your personal information if you violate the terms and conditions applicable to the Platform, in order to assist us in the application and enforcement thereof.

In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect of the information we are required to provide to them for your purchase-related transactions. Please note that all direct payment gateways adhere to the requirements set by Payment Card Industry Data Security Standard (PCI-DSS) as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by them.

Certain providers we use may be located outside Canada. Your information may therefore become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

We are not responsible for third-party service providers' data security practices.



#### **4.1 Microsoft Azure, ieffects and Magento**

Please note that we may use Microsoft Azure cloud computing services to operate the Platform. You may find their Privacy Policy here: <https://privacy.microsoft.com/en-gb/privacystatement>.

Please note that we may use Magento software to operate the Platform. You may find their Privacy Policy here: <https://magento.com/sites/default/files/REVISED-MAGENTO-PRIVACY-POLICY.pdf>.

Please note that we may use technology from ieffects AG to operate the Platform. You may find their Privacy Policy here: <https://www.ieffects.com>.

#### **4.2 Third-Party Cookies**

The Platform may make use of certain third-party cookies. Please see section 7 for more details.

#### **4.3 Business Transactions**

For the purposes hereof, a business transaction refers to the purchase, sale or other acquisition or disposition of an organization or a part of an organization, or any of its assets; a merger or amalgamation of two or more organizations; a loan or other financing transaction; the creation of a security interest in any assets or securities of an organization; or a lease or licensing transaction with respect to any asset of an organization.

In the event of a prospective business transaction with third parties, we may transfer to such third parties any information, including personal information, if and only to the extent such information is necessary (i) to determine whether to proceed with the transaction, and (ii) if we decided to proceed with the transaction, to complete it.

With any party to whom we transfer personal information in the context of a prospective business transaction, we will enter into an agreement whereby the party receiving personal information is required (i) to use and disclose that information solely for purposes related to the transaction, (ii) to protect that information by security safeguards appropriate to the sensitivity of the information, and (iii) if the transaction does not proceed, to return that information to the organization that disclosed it, or destroy it without delay.

Finally, please note that if we are acquired by or merge with another organization, your information may be transferred to the new owners or the new organization resulting from the merger. In any event, it shall be used and disclosed solely for the same purposes for it was collected, permitted to be used or disclosed before the transaction was completed.

### **5. RETENTION OF PERSONAL INFORMATION**

We retain personal information for as long as necessary to fulfill the purposes for which it was collected or comply with the law. Afterward, the information is anonymized or securely deleted.

Should you delete your account, please note that we may retain your information as required for legal, fiscal and accounting purposes, or as required to assist us in the enforcement of this Policy and any other terms and conditions applicable to the Platform.

## 6. SECURITY

We follow generally accepted industry standards to protect your personal information against being inappropriately lost, misused, accessed, disclosed, altered or destroyed.

However, please note that no method of transmission over the Internet or electronic storage is ever completely secure. We therefore cannot guarantee infallible protection, only our firm commitment to protecting your information as described herein.

## 7. COOKIES

A cookie is a small, non-executable program the Platform places on your device's hard drive. These files are useful, notably, to identify your device, gather and remember the choices and preferences made with it and monitor which web pages and Platform content are being visited using the same device. A cookie in no way gives us access to your device or any direct information about you personally.

Every time you visit the Platform, cookies share with us the information gathered about your device to help us provide you with a better experience by tailoring the Platform's operation to your needs and preferences. For example, it may allow us to identify which pages you find useful and which you do not.

Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. However, this may prevent you from taking full advantage of the website.

Here is the list of first-party cookies (that is, cookies implemented by our Platform) that we use:

- Name: .AspNetCore.Antiforgery.#  
Purpose: Helps prevent Cross-Site Request Forgery (CSRF) attacks  
Duration: Session
- Name: AI\_buffer  
Purpose: Used in context with the "AI\_sentBuffer" in order to limit the number of data-server-updates  
Duration: Session
- Name: AI\_sentBuffer  
Purpose: Used in context with the "AIBuffer" in order to limit the number of data-server-updates  
Duration: Session
- Name: \_ga  
Purpose: Registers a unique ID that is used to generate statistical data on how the visitor uses the web site  
Duration: 2 years
- Name: \_gat  
Purpose: Used by Google Analytics to throttle request rate  
Duration: 1 day
- Name: \_gid  
Purpose: Registers a unique ID that is used to generate statistical data on how the visitor uses the website  
Duration: 1 day
- Name: ai\_user

Purpose: Used by Microsoft Application Insights software to collect statistical usage and telemetry information

Duration: 1 year

- Name: ai\_session
- Purpose: Preserves users' states across page requests
- Duration: 1 day

In addition, certain cookies from the following third-party domains may be placed on your device's hard drive:

- formstack.com
- google-analytics.com
- facebook.com
- youtube.com
- doubleclick.net
- flipsnack.com

The cookies set by the aforementioned third-party domains serve analytic purposes in connection with user experience optimization and marketing, including targeted advertising. They may track a user's device and actions across multiple web domains to get a better understanding of the user's behaviour and preferences. For example, the GPS cookie enables tracking of mobile devices based on geographical location. The AWSALB cookie allows for a more efficient distribution and use of computing resources, which leads to increased performance and optimized user experience on the Platform. If you require more information in this regard, please see Section 11 to find out how you may contact us.

## **8. LINKS TO WEBSITES OR APPLICATIONS OF THIRD PARTIES**

Certain links on the Platform may direct you to websites or applications outside the Platform operated by third parties. We assume no liability with respect to the privacy practices of third parties. It is your responsibility to read such third parties' privacy policies or enquire about their privacy practices. After you leave our Platform or are redirected to a third-party website or application, this Policy and any other terms and conditions applicable to the Platform no longer govern.

## **9. CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the Platform. If we make material changes to this Policy, we will notify you by e-mail (if you have given us your e-mail address). Otherwise, all visitors will see a notice of the material changes upon accessing the Platform within (30) thirty days prior to such changes taking effect.

If you disagree with any of the changes made to this Policy in the future, you must delete your account (if you have one) and stop using the Platform.

## **10. QUESTIONS AND CONTROL OVER YOUR PERSONAL INFORMATION**

If you provide personal information and change your mind later on, you may withdraw your consent for the continued collection, use or disclosure of your information, at anytime, by contacting us in writing at the email or civic address provided below. In certain instances, we will nevertheless have to retain your information to protect our legitimate interests or comply with our legal obligations.



You may also request to know what the personal information we hold about you. Such request must be made in writing and sent to the email or civic address provided below. A small fee will be payable.

If you believe any information we are holding on you is incorrect or incomplete, please notify us in writing as soon as possible, using the address provided below. We will promptly correct any information found to be incorrect.

To access, correct or delete any personal information we have about you, modify your consent, register a complaint or enquire about our privacy practices, please contact us in writing at [vallenmarketing@vallen.ca](mailto:vallenmarketing@vallen.ca) or by mail at:

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