

PRIVACY POLICY – May 2018

The General Data Protection Regulation comes into effect on 25th May 2018 and replaces the previous data privacy law, giving more rights to you as an individual and more obligations to organisations such as ourselves holding your personal data. The “right to be informed” means we must give you more information about the way we use, share and store your personal information.

Please read this document carefully, it contains valuable information about your rights and obligations.

www.hughes-safety-showers.com (the “Site”) is brought to you by Hughes Safety Showers (“we”) of 457 Campbell Street, Sarnia, Ontario N7T 2J1. By using the Site, you agree to the terms of this privacy policy. This Privacy Policy applies only to information collected on or through the websites owned and operated by us. This Privacy Policy does not apply to information collected by us offline or through any other means or by any third party, including through any link, content, or application that is accessible from or on our Site

COLLECTION OF INFORMATION

PERSONAL INFORMATION

We collect personal information from you when you submit it to us using the online enquiry form or when you submit personal information via the WhosOn Client, our live chat function. This information may include, for example, your name, email address, address, telephone number and any information you submit to us that identifies you personally.

The information you submit is used to process your request and may be entered into our database, for example if you have requested a quote for our products or services. The original enquiry form data is logged for marketing reporting purposes and is kept for 36 months.

NON-PERSONAL INFORMATION

When you visit the Site we may collect certain non-personally-identifiable information from you, via Google Analytics and our live chat software, WhosOn Client. This can include your IP address, browser type, operating system and the domain name from which you accessed the Site. In addition, we may collect information about your browsing behaviour, such as the date and time you visit the Site, the areas or pages of the Site that you visit, the amount of time you spend viewing the Site, the number of times you return to the Site and other clickstream data. Because non-personally

identifiable information does not identify you, we may use non-personal information without restriction. For example, and without limitation, non-personal information is used within the company to improve our products, services, and website content and generate information about site visitors so we can make this website more useful.

USE OF COOKIES

Like many websites, we use a technology called “cookies” to collect the non-personal information described above. A cookie is a small text file or piece of data that can be sent by a web server to your computer, which then may be stored on your computer when you access the Site. We may also use cookies to:

- enhance or personalize your Site usage and experience;
- monitor Site usage;
- manage the Site;
- improve the Site and our products and services.

Most web browser applications have features that can notify you when you receive a cookie or prevent cookies from being sent. If you disable cookies, however, you may not be able to use certain features on the Site.

REVIEWING YOUR INFORMATION, ACCESS AND CHOICE

You have a right to request access to any personal information which we hold on you. In addition, you have the rights to:

- request that any information we are holding about you is corrected where it is inaccurate;
- request that we delete your personal information in certain circumstances (note that where we have an ongoing relationship, it may not be possible for us to delete all the information that we hold about you);
- request that we move, copy, or transfer your data to another data controller.

If you would like to exercise any of these rights, or for more information please, contact us at our registered address, or via customer.service@hughes-safety.com

USE OF INFORMATION

We may use the information we collect from and about you for the purpose of performing our obligations under any contract, or to take steps at your request prior to entering into a contract. This would include, but is not limited to, using information collected from and about you to: (1) fulfil your requests for products; and (2) engage in correspondence for the furtherance of any contractual discussion.

We may also use the information we collect from and about you for the purpose of pursuing one of Hughes Safety Showers legitimate interests including, but not limited to:

- to respond to your inquiries;
- to contact you with Site updates, newsletters and other informational and promotional materials from us where appropriate;
- to contact you when necessary;
- to review Site usage and operations;
- to address problems with the Site, our business or our services;
- to help establish and verify the identity of users;
- to protect the security or integrity of the Site and our business

Depending on the features of this Site, we may use personal information to track your activities/progress on and through this Site. We may also use your personal information for the pursuance of Hughes Safety Showers legitimate interests via:

- Internal reports, based on personal information, relating to promotion, research, and website content;
- Tracking website usage so we can improve site content and functionality;
- Contacting you about our products or services that may be of interest to you; and learning about our customers and markets;
- learning about our customers and markets.

We do not provide personally identifiable information to unaffiliated third parties for their use in marketing directly to you. We will only send you promotional emails about new products and special offers where any required consent has been obtained. You may withdraw such consent and choose not to receive promotional email from us at any time by sending an email containing your request customer.service@hughes-safety.com. Note that this will not affect the lawfulness of any processing prior to your withdrawal.

DISCLOSURE OF INFORMATION

We may disclose information collected from and about you as follows:

- to our related companies, distributors and service providers, to perform a business, professional or technical support function for us (including for example processing your order, receiving payment or sending you email messages on our behalf);
- as necessary if we believe that there has been a violation of the Site Terms of Use or of our rights or the rights of any third party;
- to respond to judicial process and provide information to law enforcement agencies or relating to an investigation on matters related to public safety, as permitted by law, or otherwise as required by law;
- in the event that our company or substantially all of its assets are acquired, your personal information may be one of the transferred assets. We may also disclose your personal information with your express consent.

Please note that any personal information that you voluntarily submit for posting to the Site becomes publicly available and can be collected and used by others.

In some circumstances it may be necessary for your personal information to be transferred to countries outside the EEA. This may be, for example, to store your data at an external server or back up location, or to allow one of our related companies or service providers to process the data in furtherance of a business, professional, or technical support function for us. Where we transfer your data to a third party outside the EEA, we are obliged to ensure adequate safeguards are in place to protect your personal information. We will do so by only transferring your personal information outside the EEA:

- where there has been a finding of adequacy in respect of the territory that the information is to be transferred to, including under a recognized scheme such as the EU-US Privacy Shield; or
- where the data is transferred between companies in our group, and European Commission approved model clauses have been incorporated to protect this transfer and any subsequent processing.

SECURITY

The security of your personal information and our clients' information is important to us. We will make commercially reasonable efforts to protect your personal information and ensure the security of our systems. While we have taken certain physical, electronic, and procedural steps to safeguard and secure the information we collect from Site visitors, no data transmission over the Internet can be guaranteed to be 100% secure and such transmissions are done at your own risk. We cannot guarantee that your information will not be accessed, disclosed, altered, or destroyed by breach of

any of our physical, technical, or managerial safeguards. We cannot assume responsibility or liability for unauthorized access to our servers and systems.

NO GUARANTEES

While this privacy policy states our standards for maintenance and use of information and we will make reasonable efforts to meet them, we are not able to guarantee these standards. There may be

factors beyond our control that may result in disclosure of information. Consequently, we disclaim any representations or warranties relating to maintenance or nondisclosure of information.

CHILDREN

We are committed to protecting the privacy of children. We do not direct the Site to, nor do we knowingly collect any personal information from, children under the age of eighteen. Children between the age of thirteen and eighteen must obtain the permission of their parent or guardian before viewing our Site. If you think that a child has provided us with personal information, please contact us. We will use reasonable efforts to delete this information. We are not liable for any unauthorized use of this website by minors.

PUBLIC FORUMS

This Site, now or in the future, may include public forums such as message boards, bulletin boards, chat rooms, or similar activities where users of the Site can communicate with one another. THIS PRIVACY POLICY DOES NOT PROTECT YOU WHEN YOU USE PUBLIC FORUMS OR PROVIDE INFORMATION (INCLUDING PERSONAL INFORMATION) ABOUT YOURSELF. You should be aware that any information shared in a public forum such as a message board, bulletin board, chat room, or other forum is public information and may be seen by third parties that do not adhere to our Privacy Policy. You should think carefully before disclosing any information in any public forum, including any forums on our Site.

SOCIAL MEDIA AND THIRD-PARTY PLATFORMS

Certain situations or functionalities on this Site may permit you to choose to cross-post or share information on a third party social media site or platform such as Facebook, Instagram, LinkedIn, Twitter, Google+, or other similar sites (collectively, "Social Media Sites"). HUGHES SAFETY

SHOWERS do not own or control such Social Media Sites, and posting your information on Social Media Sites is

subject to the third party's privacy policy and other legal terms, which may or may not provide privacy protections you agree with. HUGHES SAFETY SHOWERS are not responsible for any act or omission of any Social Media Site, nor are we responsible for the consequences of choosing to share your information on Social Media Sites.

THIRD-PARTY WEBSITES

The Site may contain links to third-party websites, which may have privacy policies that differ from our own. We are not responsible for the activities and practices that take place on these sites. Additionally, the use of cookies by third parties, including our partners, affiliates, tracking utility company or service providers, is not covered by our privacy policy and we do not have control over these cookies. Accordingly, we recommend that you review the privacy policy posted on any site that you may access through the Site.

CHANGES TO THIS PRIVACY POLICY

We may change this privacy policy from time to time. When we do, we will post the change(s) on our Site. If we change the policy in a material way, we will provide appropriate online notice to you. This notice is effective from the date shown at the top.

DO NOT TRACK DISCLOSURE

This Site does not monitor for or adjust any use of information as a result of so-called Do Not Track beacons or notices.

YOUR CALIFORNIA PRIVACY RIGHTS

California law permits our customers who are California residents to request certain information about our disclosure of personal information to third parties for their direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. To make such a request, please write to us at the following address:

457 Campbell Street,
Sarnia,
Ontario N7T 2J1



CONTACT US

If you have questions or concerns about this Privacy Policy, contact us at customer.service@hughes-safety.com