

January 15, 2019

Our Commitment

This Privacy Policy is based on the federal Personal Information Protection and Electronic Documents Act (“PIPEDA”) and Alberta’s Personal Information Protection Act (“PIPA”). It governs the relationship between GlassManager (“GlassManager”) and individuals with whom we interact, such as our customers or potential customers, partners, suppliers and contractors (“you”).

At GlassManager, we are committed to providing excellent service and to ensuring that our relationship with you is conducted with integrity and in a responsible, fair, honest and ethical manner. If you have any questions about this Privacy Policy or wish to access the personal information in our possession about you, please contact our Privacy Officer.

1.0 Collection, Use and Disclosure of Personal Information

1.1 What is personal information?

Personal information is information that may be used to identify a specific individual. Examples of personal information include your name, address, age, social insurance number and other personal identification numbers.

1.2 What personal information does GlassManager collect and use?

In the course of carrying on our business, it is necessary for GlassManager to collect and use information about a variety of individuals. The way this information is used is dependent upon the nature and sensitivity of the particular information. GlassManager limits its collection, use and disclosure of your personal information to the purposes that we have identified to you. For example, GlassManager may collect personal information such as name, address and contact information in order to transact business with you.

1.3 Purposes: Why do we collect personal information?

GlassManager collects and uses personal information for the purposes reasonably required to carry on our business, including the following:

- a. To establish and maintain an effective business relationship with you, GlassManager collects basic information from its customers, partners, suppliers, contractors and other individuals to confirm their identity and related contact information.
- b. To meet legal and regulatory requirements, GlassManager collects and uses personal information in order to meet our contractual obligations to you, and our legal and regulatory obligations to others.
- c. To understand your needs and improve our business, we may collect information from you about your business and how we meet your needs.
- d. To meet your needs and improve your business, we may provide information to you about our business and how we meet your needs.

If we identify a new purpose other than those listed above for the personal information that we have collected from you, we will obtain your consent before using your personal information for the new purpose.

1.4 What personal information does GlassManager disclose?

GlassManager may be required to disclose personal information about individuals in certain situations, including the following:

- a. To an affiliated company or a third party where the third party has agreed to handle the information in accordance with our policies and the applicable legislation.
- b. To a person whom GlassManager reasonably believes to be acting as the individual’s agent.
- c. To a person acting as a GlassManager supplier or subcontractor for business we conduct with you.
- d. To a public authority, or its agent, to the extent required to comply with legal or regulatory requirements.
- e. For the purpose of a proposed sale of all or a part of our business.

1.5 Consent

Except in limited circumstances, GlassManager will only collect, use or disclose your personal information with your consent. By your receipt of this Privacy Policy, GlassManager will assume, unless we hear from you otherwise, that you consent to the collection, use and disclosure of your personal information by GlassManager in accordance with this Policy.

You may withdraw or limit your consent to our collection, use or disclosure of your personal information at any time, subject to any legal or contractual restriction and reasonable notice. Please note that the withdrawal of your consent may change the way in which GlassManager is able to interact with you.

We will not use or disclose your personal information without your consent except in the following circumstances:

- a. To an affiliated company or a third party where the third party has agreed to handle the information in accordance with our policies and the applicable legislation.
- b. When required by law or for law enforcement or investigatory purposes.
- c. For an emergency that threatens life, health or security.
- d. For the purpose of collecting on a debt owed to GlassManager.
- e. If the information is publicly available.

2.0 Protecting Your Personal Information

Keeping your personal information confidential and secure is a priority for GlassManager. In order to ensure protection of your personal information, we have developed security procedures to safeguard and protect your personal information against loss, theft, unauthorized disclosure, copying, and unauthorized use or modification, including:

- a. Limiting the collection, use and disclosure of personal information to that reasonably required to carry on our business.
- b. Ensuring that areas and documents are only accessible by authorized personnel on a need-to-know basis.
- c. Protecting the confidential nature of personal information when dealing with other organizations and requiring them to meet the same standard as we do in handling personal information, however, we cannot be responsible for the privacy practices and policies of third parties.

3.0 Your Rights

3.1 Accessing your personal information

We will honour any reasonable requests you make to review, update or correct any of your personal information that is held by GlassManager. We will respond to your request for access within 30 days of the request being made.

You may refuse to allow us to obtain, use or share your personal information or you may also withdraw a previously given consent at any time. However, by doing so, depending on the situation, you may be limiting or even preventing our ability to provide you with the service or product you desire.

3.2 Requesting an update or correction

If you believe that any of your personal information is inaccurate, you may ask us to correct it. We will respond to your request to update or correct your personal information within 30 days of the request being made.

3.3 Registering complaints

In the event of any conflict or other concern regarding access to, or the accuracy or our use of, your personal information, you may register a question or complaint with our Privacy Officer.

4.0 Contact Information

If you wish to access your personal information, change your consent to the ways in which we may use your personal information, have a complaint about our Privacy Policy or the manner in which we may have handled your personal information, or if you have any questions about our Privacy Policy, please contact the Privacy Officer as follows:

GlassManager Corporate Office

Chief Privacy Officer
5160 Skyline Way NE
Calgary, Alberta, Canada
T2E 6V1
Telephone: 1.403.207-0997
Toll-free: 1.877.730-8324
info@glassmanager.ca

5.0 Changes to this Privacy Policy

In order to ensure that our Privacy Policy is kept up to date, we reserve the right to change it from time to time. Notice of changes to the Privacy Policy may be posted on the GlassManager website.

6.0 Visiting the GlassManager Website

A visitor to the GlassManager website, www.glassmanager.ca, is not required to reveal any personal information, such as name, address, or telephone number. Nor is such information collected passively by electronic means.

Your personal information is collected when you voluntarily complete an online form. Personal information collected in online forms is used to respond to your inquiries or requests and for other purposes reasonably required to carry on our business as outlined in section 1.3.

Our website collects visitor information in the form of the visitor's domain or Internet Protocol ("IP") address and information regarding which pages are accessed. This information is used internally, only in aggregate form, to better serve you by helping us manage and improve the content of our website and to diagnose technical problems. GlassManager may also store 'cookies' on your computer and use Google Analytics when you visit our website.

Our website may contain links to other websites; however, we cannot be responsible for the privacy practices and policies of third party websites.