

# Privacy Policy

We are committed to protecting the privacy of the personal information of our valued customers, and take care to safeguard and protect the personal information that we collect, use and disclose in the course of our business. The purpose of this Privacy Policy (this “**Policy**”) is to clearly explain how GLENTEL Inc. (“**GLENTEL**” or “**we**”, “**us**”, “**our**”) protects the privacy of our customers.

## **What is personal information?**

"**Personal information**" means any information that we collect, use or disclose about our customers, and which may include your name, address and telephone number, email address, credit card information, insurance policy, service and billing records, or other personal information.

## **We are accountable for the personal information that we collect and use**

We are responsible for maintaining the privacy and confidentiality of the personal information that we collect and use under applicable personal information protection laws.

Our Privacy Officer is responsible for the management of our privacy program and ensuring compliance with legislation. Questions about this Policy or concerns about how your personal information has been managed by our company can be directed to the Privacy Officer at 1-800-GLENTEL.

## **When we will seek your consent**

Whether you provide us with your personal information is always your choice. We will collect, use and disclose your personal information only with your knowledge and consent, except where we are required or permitted by personal information protection laws to do so without your consent.

Your consent may be express or implied. In some situations, consent may be implied, such as when you voluntarily provide information to us in circumstances where the purposes for which you are providing the information would be obvious to a reasonable person.

Your consent may also be withdrawn with reasonable notice, subject to legal or contractual restrictions. However, if we need your personal information in

order to provide services, withdrawing consent may affect our ability to continue providing such services to you.

## **Personal information we may collect and why**

We collect your personal information each time that you:

- visit or use the Samsung.com/ca website (the “**Website**”);
- provide information about yourself through the Website;
- purchase any product or service or place any order through the Website;
- make an inquiry, request new services, open or make changes to your account or ask for other product or service support;
- make a complaint or claim in connection with a product or service; or
- respond to our inquiries about your satisfaction with products or services sold on the Website or your interest in new products or services.

We may also collect information about you from third parties for the purposes of determining your eligibility for certain products and services (e.g. credit reporting agencies, your credit card company or other payment agencies).

To protect your privacy, we limit the amount of personal information that we collect about our customers to the information that we reasonably require in the circumstances.

## **How we use your personal information**

We use your personal information for the purposes of providing products and services to our customers. We may use your information:

- to be able to communicate with you about the services and products that we provide to you;
- to establish your identity if you place an order or open an account through the Website;
- to fulfill any order for products or services you place through the Website;
- to respond to your inquiries or complaints about the services or products sold on the Website;
- to process payments and to collect overdue accounts;
- to evaluate your eligibility to receive certain products or services;
- for customer satisfaction and marketing programs;

- to recommend to you our products and services or those of other third parties;
- to evaluate and improve our products and services and operations;
- to satisfy legal and regulatory requirements;
- to help us manage and develop our business and operations; and
- for the other purposes described in this Policy.

We will seek your consent before using your information for other purposes, unless we are permitted or required by law to do so without your consent.

We may communicate with you in different ways, including telephone, email or text, using the contact information that you have provided.

### **How we limit the use and disclosure of personal information**

We may disclose some of your personal information for the purposes and in the circumstances described above. Information may be shared with our employees, service providers, suppliers, business partners and authorized agents as reasonable and necessary for these purposes.

From time to time, we may share information with third parties for research, quality control or other business purposes. However, such information will only be shared on condition that its confidentiality is appropriately maintained by such third parties.

We may also disclose personal information to third parties if we are permitted or required to do so by law, for example, by court order, or for the collection of overdue accounts, or for the purposes of a corporate sale, acquisition, merger or re-organization.

We do not share personal information for purposes unrelated to our business operations. We do not sell personal information.

### **Review of anonymous data from Google Analytics**

We are committed to ensuring that the Website contains content that is valuable and useful to our customers and potential customers who visit. To assist us in this, we have implemented the Google Analytics demographics and interest reporting features on the Website. Google Analytics is an informational tool offered by Google Inc. that generates and analyzes

information about a website's traffic. Google Analytics uses "cookies" stored on your computer to help analyze how users use the Website.

These tools allow us to review anonymous data regarding the gender, age and interests of website visitors and adapt the Website content to better reflect their needs. Although this information is collected through your Google ad settings, it is not provided to us in a personally-identifiable format. Google will provide us with reports containing aggregated or anonymized information that allows us to evaluate the use of the Website. This means we cannot identify what information is about you, and we will not try to figure it out.

For information about Google's privacy practices please refer to Google's [Privacy Policy](#), and for information about Google Analytics [click here](#).

## **How we protect your personal information**

We protect personal information by ensuring security safeguards appropriate to the sensitivity of the information are in place, including through the use of the following measures:

- **Physical** (e.g. locked filing cabinets, restricted access, appropriate security measures when disposing of personal information);
- **Organizational** (e.g. employee training, security clearances, access only on a "need to know" basis); and
- **Technological** (e.g. passwords, firewalls, data disconnection from the internet, and regular backups).

We may use service providers in the course of managing or processing the personal information that is collected through the Website or our other operations. Service providers will only be provided with access to personal information as necessary to carry out their responsibilities. Some of these service providers may be located outside of Canada, and it is therefore possible that some personal information is stored outside of Canada. The personal information protection laws in these other jurisdictions may differ from the laws of Canada.

## **How to access your personal information**

You may at any time ask us to provide you with the personal information that we have collected about you by contacting the Privacy Officer. Upon receiving such a request, we will within a reasonable time tell you what personal

information we have collected and how it is being used. However, we reserve the right to withhold information that we are permitted or required to withhold under applicable personal information protection laws.

### **The accuracy and completeness of your personal information**

We make reasonable efforts to ensure that the personal information that we collect is as accurate, complete and as current as reasonably possible. Sometimes, we rely on our customers to ensure that certain information is accurate and up-to-date, such as your contact information. From time to time we may contact you to ensure that your information remains accurate and up-to-date.

If you believe that any of the information we hold about you is inaccurate, please tell us. We will promptly investigate your request, determine if it is appropriate to make any changes and respond accordingly. If you require access to your personal information or have any concerns about this Policy, please contact our Privacy Officer at 1-800-GLENTEL.

### **Application of this Policy**

This Policy applies only to GLENTEL's operations and to the operation of the Website. While we may provide links to other websites when we believe this may be useful to our customers, we do not guarantee or make any representations about the content or privacy standards of these other websites.

### **How to Contact GLENTEL**

If you have any questions or concerns about our compliance with this Policy, or if you have any suggestions about how to improve the quality of our information management practices, please contact us:

By Mail:       ATTN: Privacy Officer  
                  GLENTEL Inc.  
                  8501 Commerce Court  
                  Burnaby, BC V5A 4N3

By Phone:     1-800-GLENTEL (toll free)