

# Privacy Statement - ATOMIC ZOMBIE® EXTREME MACHINES

(a division of 1561208 Ontario Inc.)

**To which companies does this Privacy Statement apply?** 1561208 Ontario Inc. operates in Ontario, Canada, operating as Atomic Zombie® Extreme Machines. In order to better serve our customers and employees, human resources and customer information is processed and stored.

**What is Personal Information?** Personal Information is any information that is identifiable with you. This information may include but is not limited to your name, mailing address, phone numbers, gender, email address, identification numbers, etc. Personal Information, however, does not include your name, business title or business address and business telephone number in your capacity as an employee of an organization.

**How do we collect your Personal Information?** We will always collect your Personal Information by fair and lawful means by using forms, registration materials, surveys, emails, and telephone inquiries, that will identify the Personal Information, which we are obtaining and how we plan to use it such Personal Information. We often collect Personal Information from you and from third party service providers, where we have obtained your consent to do so or as otherwise permitted by law.

**How do we use your Personal Information?** We identify the purposes for which we use your Personal Information at the time we collect such information from you and obtain your consent, in any case, prior to such use. We collect your Personal Information primarily to satisfy ongoing service requirements, develop new products, build brand loyalty and enhance our relationships with customers. **\*\*We do not sell customer lists or other Personal Information.\*\*** We may also use your Personal Information as otherwise permitted by law.

**To whom do we provide your Personal Information?** We identify to whom, and for what purposes, we disclose your Personal Information, at the time we collect such information from you and obtain your consent to such disclosure. For example, we may disclose your Personal Information:

- for the purpose of assisting 1561208 Ontario Inc. conduct its business and serving its customers and employees in Ontario and around the world. - to third party service providers with whom we have a contractual agreement, which have comparable levels of privacy protection, for the purpose of (i) administering payroll and health, insurance and pension benefits and related human resources processing; (ii) performing IT services such as data processing, database services or information technology support; (iii) providing for our insurance needs; (iv) marketing or providing any of our products; (v) storage, and
- to 1561208 Ontario Inc. partners when those partners assist 1561208 Ontario Inc. in satisfying ongoing service requirements, evaluating the potential development of new products, building brand loyalty and enhancing our companies' relationships with customers. When and how do we obtain your consent? Except when otherwise permitted by law, we obtain your consent prior to collecting and, in any case, prior to using or disclosing your Personal Information for any purpose. You may provide your consent to us either orally or in writing. We will obtain your express consent for sensitive Personal Information. Your consent may also be intrinsic to the circumstances such as in the case where you provide our representatives with your phone number so that we can contact you at home. Except when otherwise permitted by law, we will only use the information for the purpose for which it was given.

From time to time, we may collect, utilize or disclose your Personal Information based on your consent and as otherwise permitted by law. You can withdraw consent at any time, (unless withdrawing the consent would frustrate the performance of legal obligations), and upon providing us with 30 days notice. However, the withdrawal of your consent may impact on our ability to serve you and to maintain our relationship. In any marketing communications sent to you we will include an easily exercisable "opt-out" function.

In certain circumstances, as permitted or required by law, we may collect, use or disclose Personal Information without your knowledge or consent. These circumstances include (where applicable): Personal Information which is subject to solicitor-client privilege or is publicly available; where collection or use is clearly in the interests of the individual and consent cannot be obtained in a timely way; to investigate a breach of any agreement or a contravention of a law; to comply with a subpoena, warrant, court order or as otherwise required by law.

**How do we ensure the privacy of your Personal Information when dealing with our affiliates and other third parties?** We remain responsible for all personal information to third parties for processing. As such, we ensure that 1561208 Ontario Inc. and all affiliates and other third parties which are engaged to perform services on our behalf and are provided with Personal Information are required to observe the intent of this Privacy Statement by having comparable levels of security protection and ensuring us that they will not use or disclose the personal information for any other purpose.

**What limiting principles do we adopt?** 1561208 Ontario Inc. only collects the personal information necessary to fulfill the purpose identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes or as required by law.

1561208 Ontario Inc. does not, as a condition of supplying a product or service to you, require consent to the collection, use or disclosure of personal information beyond that reasonably required to supply the product or service or for related operational or management or legal purposes, or to comply with its obligations under applicable law.

We do not use or disclose your personal information, except for the purposes for which it was collected, or new purposes to which you have consented, or as required or permitted by applicable law.

**How long will we utilize, disclose or retain your Personal Information?** We may keep a record of your Personal Information, correspondence or comments, in a file specific to you. We will utilize, disclose or retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected and as permitted or required by law. We have established minimum and maximum retention periods and procedures for maintaining and destroying your Personal Information, but in any case will retain your Personal Information for at least one year to allow you to have access to that information.

**How can you access your Personal Information that we have collected, utilized or disclosed?** We will make available to you any specific Personal Information about you, that we have collected, utilized or disclosed, upon your written request, to the extent permitted by law. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes and using an alternative format, if required. Your file containing all or some of your personal information will be accessible at the place of business listed below. You have a general right to have access to your file and to rectify any personal information in the file that may be obsolete, incomplete or incorrect by writing to our head office Attention: Privacy Officer. The employees whose duties are related to the handling of your personal information and the third parties acting for them or on their behalf have access to the parts of your file necessary for the specified purposes.

**What if the Personal Information we have on you is inaccurate?** You can at any time, challenge the accuracy or completeness of the Personal Information we have on you. If you successfully demonstrate that the Personal Information we have on you is inaccurate or incomplete or we receive amended information from another organization, we will amend the Personal Information as required. Where appropriate, we will transmit the amended information to third parties having access to your Personal Information.

**How fast will we respond to your written requests?** We will make every reasonable effort to respond to each of your written requests not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit. You have the right to make a complaint to the applicable federal or provincial Privacy Commissioner in respect of this time limit.

**Are there any costs to you for requesting information on your Personal Information or on our Privacy Policy or Practices?** We will not assess any costs to you for access to your Personal Information or on our Privacy Policy or Practices without first providing you with an estimate of the approximate costs which will be minimal, if any. You may withdraw your requests for access to information by notifying us within the thirty-day notice period disclosed on the estimate. If you do not notify us within such thirty-day period, we will send you a further notice indicating that you will be deemed to have withdrawn your request for access unless you advise us otherwise within thirty days. If after the expiry of this 30-day period, you have not so advised us, we will deem your request to have been withdrawn and provide you with written notice to that effect.

**What safeguards have we implemented to protect your Personal Information?** 1561208

Ontario Inc. is committed to protecting the security of personal information. We therefore use security safeguards appropriate to the sensitivity of personal information to protect it from loss or theft, as well as unauthorized access, disclosure, copying, use or modification. These safeguards include physical measures, such as restricted access to offices and equipment, organizational measures, such as security clearances and limiting access on a "need to know" basis and technological measures, such as the use of passwords and encryption.

**How do you know that the Personal Information we have on you is accurate?** We will use reasonable efforts to ensure that your Personal Information is kept as accurate, complete and up-to-date as possible. We will not routinely update your Personal Information, unless such a process is necessary. We expect you, from time to time, to supply us with written updates to your Personal Information, when required.

**How do we know that it is really you requesting your Personal Information?** We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your Personal Information. Any such information shall be used only for this purpose.

**How do you contact us regarding access to your Personal Information or making complaints?** All complaints or other inquiries regarding your Personal Information or our Privacy Policy and Practices, should be forwarded to our Privacy Officer.