

**ABCO INDUSTRIES LIMITED**  
**PRIVACY POLICY STATEMENT**

**Privacy Officer**

The Company's Controller is hereby designated as the Company's Privacy Officer, to maintain compliance with the 10 Principles of the Personal Information Protection and Electronic Documents Act (referred to as PIPEDA).

**Collection and Use of Personal Information**

- Personal information is collected from various sources in the ordinary course of business. Main sources of personal information are from Employees and Customers. The Company has documented the need for this personal information, and will collect only enough information for this purpose. The information collected could be done through various means including verbal, in person, in writing or over the internet. Information included in our files includes - but is not limited to - name, mailing address, telephone number, date of birth, personal banking information, E-Mail address, Social Insurance Number, marital status, names of spouse and dependents as well as their date of births, business number and other financial information if applying for credit.
- If personal information collected by the Company is to be used for purposes other than originally stated, it will be documented – and consent of the individual involved will be obtained before that information is released. This will normally be in writing – but may be verbal, should time constraints be a factor.
- Personal information is used to provide goods and services to employees or customers, and only information required to do this will be requested. To this end, the Company will make every reasonable effort to ensure individuals are advised and understand to what purpose the information will be used.
- Consent will be given without deception, and may be withdrawn at any time. However, if consent is withdrawn, it is possible that this will inhibit the provision of goods or services.
- In some cases, such as where required by law, consent is not required to release personal information. In such cases, only the specific information requested will be released.
- Information collected will be accurate, complete and kept up-to-date. The Company will only update personal information when it is required, to ensure that the intended purpose is properly satisfied.

- The Company will protect personal information by using the following steps:
  - 1) Access to personal information will be limited to those individuals requiring the information to perform their duties.
  - 2) Information in paper format will be kept in locked cabinets and desk drawers.
  - 3) Information in electronic format will be protected by user rights and passwords.
- Each Department has established guidelines, with respect to retention and destruction of personal information. These policies will indicate minimum and maximum retention periods, and how information will be destroyed once no longer needed.
- The Company will be open about its policies and practices relating to its management of personal information through its website and appropriate written documents. It will indicate the name, title, address, fax and phone numbers, and E-Mail address of its Privacy Officer.
- Upon request, the Company will disclose to an individual whether or not it holds personal information about that individual. The Company will allow the individual access to this information, and will provide details to the extent to which that information is being used. If, in the course of this disclosure, it is discovered that some of the information is not accurate – it will amend, correct or update as necessary.
- If an individual has any complaint, question or concern about ABCO Industries Limited's Privacy Policy or its practices – it should be directed to:

(T. R. Ritcey)  
The Privacy Officer  
ABCO Industries Limited  
P. O. Box 1120  
Lunenburg, NS B0J 2C0

OR E-mail: [tom@abco.ca](mailto:tom@abco.ca)  
OR Telephone 902-634-2105  
OR FAX 902-634-8583

- All complaints will be documented, investigated and – if found to be necessary – the Company will take appropriate steps to correct and amend its policies and practices.

ABCO INDUSTRIES LIMITED

  
Thomas R. Ritcey,  
Privacy Officer

/vjh; Mar. 11'04  
attach. - Appendix "A"

**NEED FOR PERSONAL INFORMATION**

Personal Information collected from employees is used to facilitate their remuneration, communicate issues of urgency, respond to requests from Government agencies, and satisfy the requirements of agencies providing benefit packages.

Personal Information collected from customers is used to establish credit terms and limits, and to provide ongoing credit service.

Human Resources/Payroll Department currently keep personal information for seven (7) years after termination of employment, and dispose of all records by shredding.

The Credit Department follows the same policy for retention and destruction of customer records.

A log is kept, to track disposal of records.