

## **Tritana Holdings Ltd. dba Redekop Manufacturing (2014) Privacy Policy**

**Date: May 24, 2018**

At Redekop Manufacturing (2014) (Redekop), we are committed to maintaining the accuracy, confidentiality and security of your personal information. This External Privacy Policy ("Privacy Policy") describes the personal information that Redekop collects from or about you, how and when we use it and to whom we disclose that information, as well as how we protect your personal information and how you can verify and update your personal information.

Redekop has developed this Privacy Policy to address the specific privacy concerns of certain groupings of individuals. This Privacy Policy applies to the personal information of all individuals, unless the personal information is related to an individual who seeks to be, is, or was employed by Redekop, which information is dealt with in the Redekop *"Employee Handbook"*.

### **What is Personal Information?**

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information, when used or disclosed for the purpose of business communications.

### **Personal Information collected from Redekop's websites**

This Privacy Policy also applies to websites which may be operated by Redekop from time to time and any personal information collected, used and disclosed by and through such websites, such as information automatically sent to Redekop by your web browser and personal information Redekop actively seeks to obtain about you through the use of the Redekop website that is provided by you.

It does not apply to third-party sites which may be linked to a Redekop website. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these sites or services. Redekop is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these sites and services before providing them with personal information.

You can visit our websites without telling us who you are or revealing any information about yourself, including your email address. Our web server may collect information related to your visit to our website, including the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page that is viewed by that IP address and what country you are from. We use this information to monitor our website's performance (such as number of visits, average time spent, page views etc.) and for our business purposes such as working to continually upgrade our website.

From time-to-time, we may request additional information from you by means of surveys or contests, through a Redekop website or otherwise. Your participation in these surveys or contests and sharing of any personal information in connection therewith will be deemed as your consent for Redekop to collect, use and disclose your personal information subject to the terms and conditions of this Privacy Policy.

## Cookies

A cookie is a small data file that websites commonly transfer to a visitor's hard drive when a site is visited. The cookie contains information that can identify a return visitor each time he or she visits. Redekop websites may use cookies as a way to measure activity and traffic patterns on the website in order to continually improve the visitor's experience, and to record passwords and preferences.

Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (1) notify you prior to a website placing a cookie on your hard drive so that you can decide whether or not to accept the cookie; or (2) automatically prevent the placing of a cookie on your hard drive. It should be noted that if cookies are not accepted, you may not be able to use certain features or access certain areas of the website.

## Google Analytics

- Remarketing with Google Analytics – this feature allows us to deliver ads across the Internet through Google's ad network that are tailored to the interests of users who visit our website
- Google Display Network Impression Reporting – this feature allows us to monitor the effectiveness of our ads placed through Google's ad network by tracking visits to our website. We use this feature to improve our advertising material and its interest to users.
- Google Analytics Demographics and Interest Reporting – this feature allows us to collect certain non-identifying demographics information about users who visit our website (including age, gender and interests). We use this feature to improve our website content and advertising, and make them more relevant to users.

For more information on how information is collected and processed using Google Analytics, please visit: <https://policies.google.com/privacy/partners>. For more information on Google Analytics Advertising Features, please visit: <https://support.google.com/analytics/answer/3450482>.

You may opt-out of the use of your data from Google Analytics using the Google Analytics Opt-out Browser add-on: <https://tools.google.com/dlpage/gaoptout/>. You may edit or opt-out of certain uses of your data for advertising purposes through your Google Ads Settings at <http://www.google.com/ads/preferences/>.

## What Personal Information Do We Collect?

We collect and maintain different types of personal information of the individuals with whom we interact. This includes the following information:

- contact and identification information, such as your name, address, telephone number and e-mail address;
- product and service related information concerning the products and services that we provide to, or receive from, you;

- information about farmers' farming practices;
- credit and financial information such as your payment preferences; and
- business relationship information, including information related to your agreements, preferences, advisors and decision-makers, feed-back and information requested by or provided to you.

As a general rule, Redekop collects personal information directly from you. In most circumstances where the personal information that we collect about you is received from a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions, such as you voluntarily providing personal information).

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

We may share your personal information with our employees, contractors, consultants and other parties who require such information to assist us with managing our relationship with you, including: third parties that provide services to us or on our behalf; third parties that assist Redekop in the provision of services to you; and third parties whose services we use to conduct our business. In some circumstances, your personal information may be transferred to another country to facilitate these goals. Currently, Redekop uses both internal and external sources from time to time in various jurisdictions, including the United States and other countries, for the purposes described in the section titled "Why Do We Collect Personal Information?" so that we may operate our business, and as result, your personal information may be collected, used, processed, stored or disclosed in other jurisdictions, including the United States of America and other countries, and therefore may be accessible to the law enforcement and national security authorities of those jurisdictions.

From time to time, we may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

### **Why Do We Collect Personal Information?**

Redekop collects personal information to enable us to manage, maintain, and develop our business and operations, or to respond to direct inquiries from you, including:

to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, products and services;

to be able to review the products and services that we provide to you so that we may understand your requirements for our products and services and so that we may work to improve our products and services;

- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;

- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to enable us to operate and manage our business, including research and development of new and existing products and services;
- to protect us against error, fraud, theft and damage to our goods and property;
- to enable us to comply with applicable laws or regulatory processes;
- to protect our rights under agreements; and
- any other reasonable purpose to which you consent.

### **How Do We Use and Disclose Your Personal Information?**

We may use or disclose your personal information:

- for the purposes described in this Privacy Policy; and/or
- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

We may use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

### **When Do We Disclose Your Personal Information?**

We may share your personal information with our employees, contractors, consultants and other parties who require such information to assist us with managing our relationship with you, including: third parties that provide services to us or on our behalf; third parties that assist Redekop in the provision of services to you; and third parties whose services we use to conduct our business.

In addition, personal information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of or the grant of a security interest in, all or a part of Redekop, its parent or affiliates through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Further, your personal information may be disclosed:

- as permitted or required by applicable laws or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- to protect the rights and property of Redekop;
- during emergency situations or where necessary to protect the safety, health or security of a person or group;

- where the personal information is publicly available; or
- with your consent.

### **Your Consent is Important to Us**

It is important to us that we collect, use or disclose your personal information when we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be express or implied (using an opt-out mechanism). Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time.

Typically, we will seek your consent by contract or at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

### **Choice/Opt-Out**

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by office. All communications with respect to such withdrawal or variation of consent should be in writing via mail or email.

We assume that, unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

### **How is Your Personal Information Protected?**

Redekop endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot warrant the security of any information you provide to us, and you do so at your own risk. Once we receive your information, we make commercially reasonable efforts to ensure its security on our systems.

The security of your personal information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

### **Access to Your Personal Information**

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our office. Please note that any such request or communication must be in writing via mail or email.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access as well as to search for and provide you with the personal information that we hold about you. We may charge you a minimal fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact the office of our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices as required or permitted by applicable law.

In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

### **Inquiries or Concerns?**

If you have any questions about this Privacy Policy or concerns, including challenges, about the accuracy or completeness of your personal information or how we manage your personal information, please contact our office by telephone, in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

### **Revisions to this Privacy Policy**

Redekop, from time to time, may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will make any revised version of this Privacy Policy available on our websites, and we encourage you to refer back to it on a regular basis. This Privacy Policy was last reviewed and updated on May 24, 2018.

### **Interpretation of this Privacy Policy**

This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'.

This Privacy Policy does not create or confer upon any individual any rights, or impose upon Redekop any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.