

## **PRIVACY POLICY**

*version 1.6*

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### **COMPANY INFORMATION**

Hela Spice Canada Inc. Privacy Policy,  
119 Franklin St. Uxbridge ON, L9P 1J5  
Canada

### **OPENING STATEMENT**

The privacy of our employees, visitors, customers and vendors is very important to us. The Hela Spice Canada Inc. Privacy Policy describes how we collect, use, protect, retain, and remove your personal information.

Personal information is collected with your voluntary consent. Personal Information is inaccessible to anyone outside the specific function for which it is collected. We recognize and respect the need for appropriate and adequate protections and management of personal information that is provided to us. Our Privacy Policy will assist you to understand how we manage personal information.

### **PERSONAL INFORMATION**

Personal information includes but not limited to: name, address, telephone number, email address, social insurance number, financial information, credit card numbers, resumes, applications, references, photos, driver's license, etc.

### **INFORMATION COLLECTED**

Name, address, telephone number, email address, social insurance number, financial information, credit card numbers, expiry dates resumes, applications, references, photos, credit records banking information, purchase history, opinions about products and services.

## **INTERNET USERS – COOKIES – INTERNET PROTOCOL (IP) ADDRESS AGGREGATE INFORMATION**

Hela Spice Canada Inc. does not use cookies on its websites. In addition there is no other information collected. Our website is simply displaying company related information. You may set your browser to warn you each time a cookie is being sent, or if you wish to turn off all cookies, use the options on your browser to assist you. However, these options are irrelevant regarding the use of [www.helacanada.com](http://www.helacanada.com) or [www.helacanada.ca](http://www.helacanada.ca) websites since they do not use cookies. In addition, we do not collect or store IP addresses, nor do we collect any other information via our websites.

## **CHILDREN’S PERSONAL INFORMATION**

Hela Spice Canada Inc. does not collect any information that belongs to or relate to children with the exception of the name and birth dates of employees children, which is required for the administration of company health benefits.

## **SHARING OF PERSONAL INFORMATION**

Hela Spice Canada Inc. does not share any personal information it collected with any third parties (vendors, suppliers, etc...).

## **SECURITY, STORAGE AND RETENTION OF PERSONAL INFORMATION**

We endeavor to protect your Personal Information using physical, electronic or procedural security measures appropriate to the sensitivity of the information in our control. These measures include safeguards to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use and modification.

Hela Spice Canada Inc. stores most personal information in electronic format and a smaller fraction of it in the traditional paper format. The electronic personal information is stored under password-locked access control, allowing only authorized access. Personal information on paper, is stored in safes –again– with access strictly provided to authorized personnel only.

Personal information is retained until it is practically required. This time period depends on the nature of the information. The individual departments identify the actual length of retention time.

Once retention period of personal information reached, this information is removed by the following processes: deletion of electronic records and shredding of paper records.

## **LINKS TO THIRD-PARTY WEBSITES**

Please note that [www.helacanada.com](http://www.helacanada.com) and [www.helacanada.ca](http://www.helacanada.ca) websites may contain links to other websites for your convenience and information. Hela Spice Canada Inc. does not control those sites or their privacy practices, which may differ from [www.helacanada.com](http://www.helacanada.com). Our privacy

policy cannot and does not apply to external websites. We do not endorse or make any representations about third party websites. The personal data you choose to give to unrelated third parties is not covered by the Hela Spice Canada Inc.'s privacy policy. We encourage you to review the privacy policy of any company or website before submitting your Personal Information. Some third parties may choose to share their personal data with Hela Spice Canada Inc.; that sharing is governed by that third party's privacy policy.

#### **EMPLOYEE PRIVACY OFFICER**

Anita Kokot Larsen  
email: [anita.klarsen@helacanada.com](mailto:anita.klarsen@helacanada.com)  
tel.: 905-852-5100 Ext. 108  
fax: 905-862-0440  
119 Franklin St. Uxbridge  
ON, L9P 1J5  
Canada

#### **CUSTOMER PRIVACY OFFICER**

Heather O'Connor  
email: [heather.oconnor@helacanada.com](mailto:heather.oconnor@helacanada.com)  
tel.: 905-852-5100 Ext. 102  
fax: 905-862-0440  
119 Franklin St. Uxbridge  
ON, L9P 1J5  
Canada

### **ACCESS, CONTROL AND UPDATE INFORMATION ABOUT YOU**

We want to be sure that we keep only the most accurate and up-to-date Personal Information in our records. Therefore, whenever you believe that your Personal Information needs to be updated, you may contact our privacy officers to update your contact information. You may choose at any time to remove your name, telephone numbers, and postal and email addresses from the lists we use to send notices or updates and elect not to (see next paragraph for more).

#### **OPT-OUT PROVISION**

In the future, you may have the opportunity to elect to receive email and mobile communications from Hela Spice Canada Inc. We will only email you or send you any alerts if you elect to receive them. If at any time you decide you would rather not receive these types of communications from Hela Spice Canada Inc., you can opt-out by contacting our privacy officers. At this time, however, we do not have any automated email systems in place. In case anyone wishes to have their other information removed or viewed, please also contact our privacy officers.

#### **ADHERANCE TO PIPEDA**

Privacy Principles developed by the Canadian Standards Association and incorporated into Canadian federal privacy legislation, the Personal Information Protection and Electronic Documents Act ("PIPEDA"). Hela Spice Canada Inc. is fully committed to following all of the 10 Privacy Principles as follows:

##### **I — Accountability**

Hela Spice Canada Inc. is responsible for personal information under its control and has designated a Privacy Officer who is accountable for Hela Spice Canada Inc.'s compliance with this Privacy Policy and the applicable privacy legislation for Canada and its provinces.

## 2 — Identifying the Purposes for collection of Personal Information

Hela Spice Canada Inc. will identify the purposes for which your personal information is collected at or before the time the personal information is collected. Some of the identified purposes for which Hela Spice Canada Inc. collects, uses, and discloses your personal information are described below in this Privacy Policy. If we intend to collect, use or disclose your personal information for additional purposes, we will seek your consent.

## 3 — Consent for Collection, Use or Disclosure of Personal Information

Hela Spice Canada Inc. will obtain your informed consent for the collection, use, or disclosure of your personal information, except as permitted by law.

## 4 — Limiting Collection of Personal Information

Hela Spice Canada Inc. will limit the collection of personal information, both the amount and the type of information, to that which is necessary for the purposes identified by Hela Spice Canada Inc. We will collect your personal information by fair and lawful means, and not by misleading or deceiving you about the purpose for which information is being collected.

## 5 — Limiting Use, Disclosure, and Retention of Personal Information

Hela Spice Canada Inc. will not use or disclose personal information for purposes other than the identified purposes for which it was collected, except with your consent or as required or permitted by law. Hela Spice Canada Inc. will retain your personal information only as long as necessary to fulfill the identified purposes.

## 6 — Accuracy of Personal Information

Hela Spice Canada Inc. will attempt to make sure that your personal information will be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

## 7 — Security Safeguards

Hela Spice Canada Inc. will protect your personal information by security safeguards appropriate to the sensitivity of the information.

## 8 — Openness Concerning Policies and Practices

Hela Spice Canada Inc. will make readily available to you specific information about our policies and practices relating to the management of personal information.

## 9 — Individual Access to Personal Information

Upon written request, subject to certain exceptions, Hela Spice Canada Inc. will inform you of the existence, use, and disclosure of your personal information and will give you access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

## 10 — Challenging Compliance

You have the right to address a challenge concerning compliance with this Privacy Policy to Hela Spice Canada Inc.'s Privacy Officer.

## **CHANGES TO OUR PRIVACY POLICY**

Hela Spice Canada Inc. will update this Privacy Policy occasionally. When we posts changes to this Privacy Policy, we will also revise the "Last Updated" date on the top of Hela Spice Canada Inc.'s Privacy Policy. If there are material changes to this Privacy Policy, Hela Spice Canada Inc. will notify you by email, or by means of a notice on our home page. We encourage you to review this Privacy Policy periodically to be informed of how Hela Spice Canada Inc. is protecting your information and to be aware of any changes to the Privacy Policy. Your continued use of the site after the posting of any amended Privacy Policy shall constitute your agreement to be bound by any such changes. This Privacy Policy is incorporated into any Terms and Conditions governing the various websites and any programs or services operated or managed on or behalf of Hela Spice Canada Inc. Any changes to this Privacy Policy are effective immediately after being posted by Hela Spice Canada Inc.