

At Barre West, we are committed to maintaining the accuracy, confidentiality and security of your personal information. We have developed this ***Privacy Policy*** to describe our specific privacy policies and practices (i) of how we collect, use and disclose the personal information of those individuals who visit our website and (ii) as applies more generally to the personal information of all individuals with whom we interact including customers, vendors of various goods and services, contractors, employees, and other individuals.

It is Barre West's policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and/or an individual's right to privacy are different from one jurisdiction to another. This *Privacy Policy* covers only those activities that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

### **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.

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

#### *Website*

You can visit our website 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 (e.g., number of visits, average time spent, page views, etc.) and for our business purposes such as upgrades to our website.

In addition, we collect the personal information that you submit to our website, such as your name, address and any other information that you choose to provide by:

- ◆ using the "Contact" portion of this website;
- ◆ using the "My Account" portion of this website; or
- ◆ by corresponding with a representative of Barre West via email using the hyperlinks created for that purpose.

Where you request information from us, we may use the email address that you provide to send you information about offers on products and services that we believe may be of interest to you. If you have asked us to put you on an email mailing list to provide you with certain information on a regular basis, or if we send you information about our offers on products and services by email, you may ask us to remove you from the list at any time (using the unsubscribe instructions provided with each email and on the site where you signed up).

#### *Generally*

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

- ◆ contact and identification information, such as your name, address, telephone number and email address;
- ◆ product-and-service related information concerning the products and services that we provide to, or receive from, you;
- ◆ credit and financial information, such as your credit and/or banking information; and
- ◆ business relationship information, including information related to your agreements and preferences, as well as any feedback and information requested by or provided to you.

We may also collect market-related information, which may include personal information, concerning market trends and activities impacting our business. This information may include contract terms, financial information and other information for the purpose of market analysis and strategic planning. We may also collect information related to our

media, marketing, community, investor and public relations activities and information related to our interactions with financial and other analysts and advisors.

As a general rule, Barre West collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information unless such permission is implied from your actions.

From time to time, we may utilize the services of third parties in our business and 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.

### **What About Links to Other Websites?**

Our website may contain links to websites of other businesses that may be subject to less stringent privacy standards. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. Barre West is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.

### **How Do We Use Cookies?**

When you visit the website, we place a “cookie” on the hard drive of your computer to track your visit. A cookie is a small data file that is transferred to your hard drive through your web browser that can only be read by the website that placed the cookie on your hard drive. The cookie acts as an identification card and allows our website to identify you and to record your passwords and preferences. The cookie allows us to track your visit to the website so that we can better understand your use of our website so that we can customize and tailor the website to better meet your needs.

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. Note that if cookies are not accepted, you will not be able to access a number of web pages found on the website.

### **Why Do We Collect, Use and Disclose Personal Information?**

The personal information collected is used and disclosed for our business purposes and for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

Collection, use and disclosure of your personal information enables us to manage, maintain and develop our business and operations, including:

- ◆ to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested (e.g. we will use your personal information to establish your identity and location to provide you with the products and services you have requested);
- ◆ to review the products and services we provide to you so we may understand your requirements and to improve our products and services;
- ◆ to review the products and services that we obtain from you so we may work with you and for you to understand our requirements for such products and services;
- ◆ to comply with your requests (e.g. 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 protect us against error, fraud, theft and damage to our goods and property;
- ◆ to protect you and your property against theft and damage;
- ◆ to enable us to undertake our environmental, health and safety activities;
- ◆ to enable us to comply with applicable law or regulatory requirements; and

- ◆ any other reasonable purpose to which you consent.

Your personal information may be used or disclosed to our employees, contractors, consultants, service providers, affiliates and other parties who require such information to assist us with establishing, maintaining and managing our relationship with you. We require any third party service provider with whom we share your personal information to protect such information in a manner consistent with this policy and to limit the collection, use and disclosure of such information to the performance of services for Barre West. In addition, personal information may be disclosed or transferred to another party in the event of a change in ownership of, or a grant of a security interest in, all or a part of Barre West.

Some or all of the personal information we collect may be stored or processed in jurisdictions outside of Canada, including the United States. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions.

Further, your personal information may be disclosed:

- ◆ as part of Barre West's regular reporting activities;
- ◆ to protect the rights and property of Barre West;
- ◆ during emergency situations or where necessary to protect the safety of a person or group of persons;
- ◆ where the personal information is publicly available; or
- ◆ where required by law, with your consent.

We do not sell or otherwise provide personal information to other companies for the marketing of their own products or services.

#### *Video Surveillance on Barre West Premises*

Barre West may use video surveillance on its premises for the purposes of security of people, property and Barre West assets. Any individual on the Barre West premises, including customers, employees, and vendors, may be recorded. If video surveillance is being used, you will see a notification, prior to entering the areas where there may be video surveillance, that your image and activities may be recorded. If you are a customer, your continued presence at the Barre West premises serves as consent to be recorded. If you do not wish to be recorded, you will have the opportunity to leave the premises prior to entry into the area of surveillance.

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

#### *Generally*

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be express, implied or deemed (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 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 attempt to advise you of that purpose before such use or disclosure. We may collect, 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.

#### *Website*

By using our website, you signify that you have consented to the collection, use and disclosure of your personal information as explained in this *Privacy Policy*. If you do not agree with any terms of this *Privacy Policy*, please do not use the website or submit any personal information to us.

You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Officer using the contact information below. In some circumstances, a change in or withdrawal of consent may severely limit our ability to provide products or services to, or acquire products or services from, you. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

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

Barre West endeavours 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.

Specifically, as relates to the website, unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while the website strives to protect your personal information, we cannot warrant the security of any information you transmit to us, and you do so at your own risk. Once this website receives your transmission, we make reasonable efforts to ensure its security on our systems.

### **Access to and/or Updating Your Personal Information**

You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information, please contact our Privacy Officer using the contact information set out below. Please note that any such communication must be in writing. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes. In certain cases, we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

### **Inquiries or Concerns?**

For more information about our *Privacy Policy*, please visit our website at <https://www.barrewest.com/>. If you have any questions or concerns about our *Privacy Policy*, please contact:

Pauline Chan, Privacy Officer  
Phone: (403) 474-5620  
Email: [hello@barrewest.com](mailto:hello@barrewest.com)

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

Barre West may 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 post any revised version of this *Privacy Policy* on our website and we encourage you to refer back to it on a regular basis. This *Privacy Policy* was last updated on July 17, 2020 and your continued use of the website after any such changes constitutes your acceptance of this *Privacy Policy*, as revised.

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

Any interpretation associated with this *Privacy Policy* will be made by our Privacy Officer. 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”.

## Barre West – Privacy Policy

This *Privacy Policy* does not create or confer upon any individual any rights, or impose upon Barre West any 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.