

RGS PRIVACY POLICY

Effective: August 2, 2025

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1. INTRODUCTION

RAS Custom Construction Specialties Ltd., in conjunction with its affiliates (collectively “Rascom GreenBuild Services” and hereinafter also defined as “RGS”, “we” or “us”), is committed to protecting the privacy and security of any of your personal information obtained by reason of your interaction with RGS, including through or in connection with our store(s) and our website(s) (including but not limited to www.rascomgreenbuild.ca, mobile applications, loyalty program, services such as chat, live support, or of similar functionality (“Chats”), and any other site or portal referring the user to this privacy policy, collectively, the “Sites”).

This privacy policy (the “Privacy Policy”) explains:

- the types of personal information we collect;
- when such collection occurs;
- how we use and share the personal information we collect;
- the steps we take to ensure your personal information is safeguarded appropriately; and
- how you can contact us regarding your personal information and this Privacy Policy.

This Privacy Policy has been put in place to comply with the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and provincial privacy statutes.

The terms and conditions of use of our Sites refer to and incorporate this Privacy Policy and by using said Sites, you consent to this Privacy Policy. From time to time, we may make changes to this Privacy Policy.

The Privacy Policy is current as of the date which appears at the top of this page. We encourage you to look for updates and changes to this Privacy Policy by checking its effective date from time to time. If the changes we make are significant, we will provide a more prominent notice and obtain consent when required by applicable laws. Continued use of the Sites after an update is posted will constitute consent to the new version of the Privacy Policy. If you do not agree to the changes in our Privacy Policy, it is your responsibility to stop using our services or purchasing our products. It is your obligation to ensure that you read, understand and agree to the latest version of the Privacy Policy.

Our Sites may contain links to websites which are owned and operated by third parties. Please note that this Privacy Policy does not apply to such other websites and services and we have no responsibility over their content or privacy policy.

2. DEFINITION OF PERSONAL INFORMATION

This Privacy Policy applies to any personal information we collect or receive about you, from you or any other source. “Personal information” as used in this Privacy Policy refers to any information that identifies, relates to, describes, or is reasonably capable of being associated with a particular individual and that is recorded in any form (such as your name, your phone number, your postal and email address and your payment information), as further defined in PIPEDA and applicable provincial legislation. It may also include technical information such as your IP address, browser settings and device ID, but only when this information can identify you as an individual. Please note that personal information excludes information that is anonymized as described in section 5 (ex: aggregate information which represents compiled data from a group of individuals who can no longer be individually identified).

Please note that we do not intend to collect information from a minor. If you believe we may have collected information about your minor, please contact us as indicated in the “Contact Us” section so that we can endeavour to delete it.

3. CATEGORIES OF PERSONAL INFORMATION COLLECTED

We limit the collection of personal information to what is reasonably required to fulfill the purposes for which it was collected. Depending on your interaction with us, we may collect:

- **Personal identifiers**, such as name, postal address, phone number, email address, account number, username, your appearance or Internet Protocol (IP) addresses, signatures;
- **Payment information**, such as credit or debit card number when you make purchases;
- **Professional or employment-related information and other information you submit to us when applying for an employment opportunity**, which may include some of the information described above, as well as letters of motivation, your resume, references and any additional information provided by you in an application;
- **Internet or other electronic network activity information (i.e. technical information when you visit our websites or use our mobile applications)**, including when you log in to use our products and services. This information is collected via automated means, such as cookies, authorized token, web beacons and similar technologies, and may include your IP address, device ID, browser type, data about the web pages you visited on our websites, time and duration of a visit, information about your location, your language preferences.

4. COLLECTION OF PERSONAL INFORMATION

We will generally collect personal information directly from you when you purchase a product, browse a Site or interact with us directly, as deemed necessary for the purposes defined in Section 5 below.

a. Directly from You

We may collect your personal information directly from you such as:

- when you purchase a product in stores or on our Sites or make inquiries regarding your purchases or products, we may collect information about the transaction, payment or shipment (including information about the recipient of such shipment, if applicable);
- when you contact us or send us questions, comments, suggestions or complaints, we may collect contact information and information about your inquiry that is necessary in order to address it or to respond to you;
- when you apply for a position, we may collect contact information and other information to process your application for employment;
- when you create or access an account on our Sites, we may collect information to identify you; when you use (and install, when applicable) our Sites, Chats and/or applications, we may collect information about how you use the Sites and where you are located, as further discussed below; and
- we may collect any other personal information you voluntarily provide to us in connection with any other matter.

Safeguarding your Personal Information

We have reasonable and appropriate physical, electronic, and administrative measures in place to safeguard the security of your personal information. However, when you communicate with customer service via email or Chat on our Sites, these communications may not be encrypted. For that reason, we ask that you do not share sensitive information via these communication channels. You may not impersonate or attempt to gain information regarding another individual via Chat.

b. Through our Website or other Technologies

We or our service providers, that help us maintain and operate our Sites and mobile applications, may also automatically collect the following information relating to your access to and use of our website and applications through cookies (small data files stored on your device used to access and use our Sites), Web beacons (small transparent images used to track Sites visits and effectiveness of advertising) and other similar technologies: your domain name; your browser type and operating system; your type of computer or mobile device; pages you view; links you click; your IP address; the length of time you visit or use the service, and how you use the service. However, please note that cookies and beacons might be necessary to access or use certain features of our Sites.

We may also collect information you share regarding RGS on social media such as Facebook and Twitter. We may also be collecting information about your approximate physical location when you use a mobile device to access our Sites. If you do not want us to collect such information, please adjust or modify the settings of your mobile device accordingly.

c. Cameras

Please be aware that we may use cameras in certain of our stores to protect our rights, property and safety and those of our employees, customers and the public and in order to look for ways to improve our customers' experiences. For example, through surveillance cameras or automated technology used at our self-service checkouts to help you scan your items efficiently and to prevent fraud. We do not use these cameras to identify people except when reasonably necessary for these purposes or as required by law. Where this is applicable, signs will be posted to indicate that cameras are in use. Please note that we do not share video footage unless required by law or if the formal request comes from a law enforcement officer and is accompanied by a production order. Any request must be submitted to info@rascomgreenbuild.ca.

5. USAGE OF PERSONAL INFORMATION

We will generally use your personal information as part of our normal business operations in order to provide you with our products and services, in our stores or through our Sites, and to support our business, for research and development purposes, for marketing purposes or otherwise, with your consent or as permitted or required by law as described in more detail below. We may also anonymize your personal information so that it, irreversibly, can no longer be used to identify you directly or indirectly, in accordance with generally accepted best practices (e.g. industry standards), applicable laws and regulations, and our internal policies and practices. This anonymized information is no longer considered personal information. We anonymize personal information to protect your privacy and the security of your personal information, and we use and share anonymized information for the purposes described below.

a. General business purpose

More specifically, we may use your personal information for the following business purposes:

- to process your purchases and related transactions;
- to provide customer service and to respond to your inquiries or requests;
- to elaborate and improve our product offerings and our services;
- to manage and improve our customers' experiences and our Sites;
- to monitor, analyze and assess the access and use of our Sites, including the registration and authentication of your account, if applicable;
- to customize the content of our Sites and advertising;

- to help you locate nearby stores;
- to protect our rights, property and safety and those of our employees, customers and the public;
- to detect and prevent fraud;
- to maintain appropriate records for internal administrative purposes, including for staffing and management of personnel; and
- to comply with legal requirements.

b. Research and Development Purposes

We may use personal information to understand and assess your interests and changing needs with a view to improving our products and services and developing new ones, as well as to evaluate potential improvements or other modifications to the functionality of our websites. For instance, we may use third-party web analytics services, such as Google Analytics, to help us analyze how visitors use our websites. When required by law, we will use anonymized information for these purposes.

c. Marketing Purposes

We may use your personal information to provide you with personalized content and services, such as tailoring our products and services, our digital experience and offerings. We may also use your personal information to communicate with you in a variety of ways (for example, by email, telephone, text message, direct mail or through our online support services) about our programs, products, services, special offers, promotions, contests or events that may be of interest to you. If you no longer wish to receive our commercial electronic messages, please follow the unsubscribe procedure included in each of these messages. For more information on this topic, see the **“Your Privacy Rights”** section.

6. RETENTION OF PERSONAL INFORMATION

Please note that we will only keep your personal information for as long as reasonably necessary for the above purposes or as required by law. Once no longer required, your personal information will be securely destroyed or anonymized, in compliance with applicable laws. We keep personal information for various legal and business purposes. For instance, this may include managing our operations, providing you with the products or services that you requested, assessing risk, preventing, detecting and investigating fraud or other criminal activities, and complying with our legal obligations. As such, we keep personal information only for as long as required to fulfill our legitimate legal and business purposes. To this end, we keep your personal information in accordance with our data retention schedule, which takes into account our legal, regulatory and contractual obligations to you and others. When your information is no longer required for these purposes, we securely destroy, erase or anonymize the information in as described in section 5. Please note that while you may be entitled to withdraw your consent to the collection, use or disclosure of personal information, subject to certain legal or contractual restrictions, depending on the circumstances, this may affect our ability to continue providing you with these services or features. In any event, and as permitted under applicable laws, we may be entitled to keep your personal

information for a certain period of time after you withdraw your consent in order to fulfill our legal and business purposes.

7. SHARING OF PERSONAL INFORMATION

We shall not disclose or share your personal information without your consent to any company or person other than as authorized by law or as follows:

- to those entities affiliated to RGS for the purposes detailed in this Privacy Policy;
- with service providers who are assisting us with respect to any of the purposes stated in Section 5 above (including payment solution providers,) require such information to perform their services for us, it being understood that they will only be permitted to use the information as part of the performance of their work for us or when the disclosure of your information is required by law and that such third parties will have appropriate privacy standards in place. For example, if you are purchasing a Gift Card, you will be required to consent to the disclosure of your personal information to RGS's third-party fraud prevention service provider. The personal information disclosed will include your name, address, email, order amount, and partial payment card information. The personal information will be incorporated into the fraud prevention services that will be provided to (a) RGS, (b) the service provider and its affiliates (c) and the service provider's other clients. The service provider and its affiliates will use the personal information to provide fraud prevention services and will not disclose the personal information to other clients. Exceptionally, blurred images taken from the automated technology used at our self-service checkouts may be shared with our third-party service provider for developments purposes. Personal information will be disclosed to the service provider in accordance with this Privacy Policy;
- if we believe that the disclosure of personal information is required by law;
- if we believe that the disclosure of personal information will help us protect our rights, our property and our safety and those of our employees, customers and the public;
- if we believe that the disclosure of personal information is necessary in the investigation of suspected or actual illegal activity or in response to a request by law enforcement authorities;
- if such disclosure would be in a way that it would not directly identify you, such as through aggregate information as mentioned in Section 1 above; and
- when required in the context of a prospective or completed business transaction, such as a transfer of assets or shares or merger, in accordance with applicable legal requirements. For example, we may make your personal information available to advisors or (potential) buyers of our business if necessary for concluding the transaction and continuing operating the business.

8. YOUR PRIVACY RIGHTS

Generally, provincial privacy legislation in Canada provides that if we notify you (for example, through the distribution of this Privacy Policy) of the purposes for which we intend to collect, use or disclose your personal information, and those purposes are reasonable, we will have your implied consent to act in accordance with the Privacy Policy. You have choices about the way RGS handles your personal information.

a. Changing your communication preferences

You can always choose not to receive marketing or promotional messages from RGS by email by clicking on “unsubscribe” in any email you receive. Please note that even if you have indicated your choice not to receive commercial messages from us, we may still communicate with you in connection with a service, in accordance with applicable law (for example, to send you important product information, service notification or recall). In addition, it may take up to ten (10) business days to register a change of preference across all our records.

b. Changing your browser settings on your device

We use technology to enhance your experience and present you with offers, including personalised advertising. Through technologies such as cookies, our websites recognize you when you use or return to them and can provide you with a seamless experience. You can remove or disable some of these technologies at any time through your browser. However, if you do so, you may not be able to use some of the features of our websites. Please refer to your browser instructions or help screen to learn how to block, delete and manage cookies on your computer or mobile device.

c. Withdrawal of consent

You may withdraw your consent to the collection, use and disclosure of personal information in accordance with this Privacy Policy at any time upon reasonable notice to RGS in writing, subject to legal or contractual restrictions. To do so, you may communicate with our customer service through the “Contact Us” link of our website.

The withdrawal of your consent may affect our ability to continue to provide you with the products and services that you have or would like to receive because the continued use and disclosure of your personal information is a necessary part of making the product or service available to you. In some circumstances, legal requirements may prevent you from withdrawing consent and/or we may be required to keep some of your personal information as detailed in section 6.

9. SAFEGUARDS AND DATA GOVERNANCE

We have implemented physical, organizational, contractual and technological security measures in an effort to protect your personal information and reduce the risk of loss or theft, unauthorized access, disclosure, copying, misuse or modification of your personal information. These measures include restricting physical access to our offices and records, restricting access to your personal information to only those employees or agents who require

access to fulfill their responsibilities, and restricting unauthorized access, disclosure, use and misuse of your personal information in our custody and control. We also periodically update and review such security measures.

Our goal is to prevent unauthorized access, loss, misuse, sharing or alteration of personal information in our possession. We also use these safeguards when we dispose of or destroy your personal information.

We maintain policies and practices which ensure the protection of your personal information. Depending on the volume and sensitivity of the information, the purposes for which it is used and the format in which it is stored, we implement a combination of measures to protect your personal information, including:

- Internal policies and procedures that define the roles and responsibilities of our employees throughout the information life cycle and limits their access to such information on a “need-to-know” basis;
- If information is collected or stored in electronic format, technical safeguards such as encryption, firewalls, antivirus software and similar measures;
- A designated Privacy Officer to monitor RGS’s compliance with applicable personal information laws;
- Employee privacy and data security training;
- Procedures for receiving, investigating and responding to complaints or inquiries regarding RGS’s information handling practices, including any security incidents involving personal information;
- Framework governing the retention and destruction of personal information, as more fully described above in the “Retention of Personal Information” section of this Privacy Policy;
- Contractual protections and other measures to ensure that service providers with whom we share personal information maintain adequate privacy protections and standards. For example, we generally require our service providers to limit their use and retention of personal information to what is necessary to provide their services and to notify us in case of any actual or suspected security incident. We also try to monitor and audit their compliance with these requirements in various ways (e.g. on-site inspections (if feasible), surveys and interviews, proof of certification).

10. CROSS-BORDER TRANSFERS OF PERSONAL INFORMATION

Your personal information may be transferred, stored, accessed, or used in a jurisdiction outside your jurisdiction of residence (for example, outside your province or outside Canada) in connection with our use of third-party service providers engaged by us. We engage these third-party service providers to assist us in providing our services to you; for example, in order to process payment, fulfil product orders, provide e-commerce functions, or manage our communications with you. We use our best efforts to ensure that all of our third-party service providers take reasonable security measures to protect your personal information (this includes technical, administrative, and physical safeguards to protect your personal information). We use our best efforts to ensure

our service providers only use your personal information for authorized purposes we have made known to you or which are otherwise permitted by applicable law. Where personal information is located outside of your province of residence or outside Canada, it is subject to the laws of that jurisdiction which may differ from those in your jurisdiction and any personal information transferred to another jurisdiction will be subject to law enforcement, regulatory, and national security authorities in that jurisdiction. Subject to these laws, we will to the best of our abilities use contractual measures to maintain protections that are at least equivalent to those that apply in Canada.

11. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You may be entitled to access your personal information and request the rectification information that is inaccurate, incomplete or no longer up to date, subject to limited exceptions set out in applicable laws.

Depending on the law applicable in the jurisdiction where you reside and subject to legal or contractual restrictions, you may also be entitled to:

- request that we stop or restrict processing your personal information or to have it erased;
- request information on automated processing of your personal information. You can obtain information on the personal information used to render the decision (and request that this information be correct) and the reasons, principal factors and parameters that led to the decision;
- obtain a copy of the personal information we collected from you;
- request that we provide you with the personal information we have collected from you in a structured, commonly used technological format, or request that we provide it to a third party authorized to collect it; and
- obtain additional information about data processing, including the personal information collected and how it is processed by RGS. To submit a request, please contact us in writing using the relevant contact information listed in the Contact Us section below.

12. CONTACT US

You can contact our Privacy Officer at the address and email found below if you wish to ask questions, express concerns or submit a complaint regarding this Privacy Policy.

To ensure that your personal information is accurate, complete and up-to-date, you may contact us or log into your account (if applicable) if any changes or modifications are required. You may also send us a written request if you wish to access the personal information we have collected about you. Please be advised that in order for you to modify, access or review your personal information, we may ask you to provide us with sufficient identification.

In all cases, we will generally attempt to answer your request within thirty (30) days or we will advise you if we require a longer response time.

RGS Privacy Officer

Email Address: info@rascomgreenbuild.ca

Mailing Address: PO Box 87587 Thornhill Square, Thornhill ON L3T 5W0