

# Privacy Policy

This privacy policy (this “Policy”) has been compiled to better serve those who are concerned with how their personal information is used by Neels Heating & Supplies Ltd (“Neels Heating & Cooling”, “us”, or “we”). Please read this Policy carefully to get a clear understanding of how we collect, use, and disclose personal information that you or a third party provide. Providing personal information or authorizing a third party to disclose personal information to us signifies your consent to Neels Heating collection, use and disclosure of your personal information in accordance with this Policy.

For the purposes of this Policy, “personal information” means information that can identify an individual directly or through other reasonably available means. The meaning of “personal information” shall be interpreted in a manner that conforms with the minimum requirements of applicable provincial and federal privacy legislation.

## **What personal information do we collect?**

We collect personal information by fair and lawful means and limit collection to that information which is necessary for the purposes identified in this Policy. The type of personal information that we may collect includes: your name, email address, address, phone number, type of house, year your house was built, the characteristics of your home (e.g. Sqft, Style; whether your home is dry in the winter, etc.), the characteristics of your family (e.g. whether anyone suffers from allergies or asthma; whether you have any pets), etc., billing information, credit score and other financial information, and other information that you provide to us, or our employees or independent contractors.

## **When do we collect information?**

Personal information may be collected in a number of ways, including: in person, over the phone, by mail, by fax, over the Internet, and from third parties who you have authorized to disclose personal information to us.

We collect information from you when you register on our site, place an order, subscribe to a newsletter or enter information on our site.

If you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party directly. If the third party does not sufficiently respond to your inquiries, please let us know immediately.

Your personal information will only be used or disclosed in accordance with the purposes for which it was collected, unless you have otherwise consented or except where required or permitted by law.

#### Purposes for Collecting, Using, and Disclosing Personal Information

We collect, use, and disclose personal information:

To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.

- To improve our website in order to better serve you.
- To allow us to better service you in responding to your customer service requests.
- To administer a contest, promotion, survey or other site feature.
- To process and complete your transactions.
- To ask for ratings and reviews of services or products.

To follow up with you after correspondence (live chat, email or phone inquiries).

To run and manage our business (including planning, quality improvement, processing payments, reporting, resource allocation, and processing, verifying, and delivering your orders).

To understand the demographics, interests, usage patterns, and other characteristics of our customers and potential customers.

To permit potential purchasers, auditors or advisors to evaluate Neels Heating on a confidential basis.

To determine suitability for advancing credit, loans and other payment plans available to you.

To provide information to our employees and the independent contractors that we retain in connection with the provision of services to you (including the delivery and installation of products that you ordered, as well as any repairs and maintenance following installation).

#### **How do we protect your information?**

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible. We use regular Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

### **Do we use ‘cookies’?**

Yes. Cookies are small files that a site or its service provider transfers to your device through your Web browser (if you allow) that enables the site’s or service provider’s systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We use cookies to:

- Help remember and process the items in the shopping cart.
- Understand and save user’s preferences for future visits.
- Keep track of advertisements.
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your device warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since every browser is a little different, we suggest that you look at your browser’s Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your site experience more efficient may not function properly.

### **Third-party disclosure**

We will only disclose your personal information to third parties if you have so consented or if required or permitted by law.

The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements. In some instances, such as a legal proceeding or court order, we may also be required to disclose your personal information to authorities. Only the information specifically

requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the disclosure request have legitimate grounds to do so.

Your personal information may be disclosed in situations where we are legally permitted to do so, such as in the course of employing reasonable and legal methods to enforce your rights, enforce our rights, or to investigate suspicion of unlawful activities. We may release certain personal information when we believe that such release is reasonably necessary to protect the rights, property and safety of ourselves and others.

You also understand and agree that we may use your personal information and disclose your personal information to third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of our business or assets (including accounts) for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples, permitting such parties to determine whether to proceed or continue with the transaction, fulfilling any reporting or audit requirements to such parties, and/or disclosing personal information as part of concluding a sale or transfer of assets. Our successors and assigns may collect, use and disclose your personal information for substantially the same purposes as those set out in this Policy. In the event the transaction does not go through, we will require, by contract, the other party or parties to the transaction not to use or disclose your personal information in any manner whatsoever for any purpose, and to return or destroy such personal information.

Your personal information may be provided to our employees and the independent contractors that we retain in connection with the provision of services to you (including the delivery and installation of products that you order, as well as any repairs and maintenance following installation). Your payment information will be provided to our third party payment processor in order to process your payment. Your personal information may be provided to Financeit or other financial institutions if you complete a credit application in connection with a proposed purchase of our products and services.

We may provide your information that is not personal information to third parties for marketing, advertising, or other uses.

### **Third-party links**

Our website is governed by the provisions and practices stated in this Policy. Our website may contain links to third party sites that are not governed by this Policy. Although we endeavour to only link to sites that share our commitment to your privacy, please be aware that this Policy will no longer apply

once you leave our website and that we are not responsible for the privacy practices of third party sites. We therefore suggest that you closely examine the respective privacy policies of third party websites to learn how they collect, use and disclose your personal information.

## **Google**

Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users can modify the preferences for how Google advertises to them by going to the Google Ad Settings page. Alternatively, users can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

We, along with third-party vendors such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.