Policy on Privacy of Customer Personal Information

HDC Inc. ("HDC") is committed to protecting the privacy and security of your personal information obtained by way of your customer relationship with us. This policy explains the types of customer personal information we collect, how it is used, and the steps we take to ensure your personal information is handled appropriately and securely.

Our policies and practices are established to assist us in complying with the Personal Information Protection and Electronic Documents Act (PIPEDA) which applies to provincially regulated companies effective January 1, 2004. Our principles for protecting your personal information are based on the Canadian Standards Association's model, now a statutory standard under the federal Personal Information Protection and Electronics Documents Act.

We may record calls for purposes of accuracy, performance reviews and training.

HDC may disclose personal information to another entity purchasing the assets of HDC, provided that entity abides by this or a similar privacy policy.

What is personal information?

Personal information is information that refers to an individual specifically and is recorded in any manner or form, such as hard copy file or as part of a database. Personal information includes such things as name, address, telephone number, Social Insurance Number, credit records and banking information.

Our Commitment to your Privacy

HDC is governed by the following ten (10) privacy principles as outlined in the Personal Information Protection and Electronic Documents Act:

1. Accountability to You
HDC is responsible for all personal information under its control, including any personal information that is transferred to a third party for processing, storage or other purposes. Our employees are accountable for compliance with these privacy and security principles. Moreover, HDC has appointed a Privacy Officer to oversee compliance with the stated principles as well as deal with any issues that may rise.

2. Identifying the Purposes for Personal Information
HDC has identified the purposes for which your personal information is collected. Requested information is referenced against these identified purposes to ensure consistency of application at or before the time the information is collected.
- Name, address and telephone number
- Banking information, credit rating and payment records and
- Identification numbers (including social insurance number)

As part of our relationship with you, we may collect, use and retain your personal information to:
- Identify you
- Understand your needs
- Provide you with ongoing service
- Establish and maintain communication
- Respond to your inquiries
- Investigate and settle any issues you may have
- Offer you additional products and services, as well as providing information that may be of assistance to you
- Meet regulatory and legal requirements

3. Consent
HDC obtains your express consent (written or electronic agreement) to collect, use or disclose personal information. The method of obtaining consent is appropriate to the type of personal information being collected, used or disclosed:

- HDC will obtain your express consent (verbal, written or electronic agreement) to collect, use or disclose sensitive personal information such as personal financial information.

- HDC will use implied consent to collect, use or disclose your personal information where one or more of the following apply
  - a customer relationship already exists
  - express consent has previously been given
  - where the purpose of using the personal information would be reasonably apparent to you

However, should the identified purposes for collecting and using your personal information change, we will notify you and obtain your express consent.

You can change your consent preferences at any time by contacting customer service at HDC who can help direct the call to the appropriate source. To change your preferences, refer to the “How to contact us” section below.

You may choose to withdraw or refuse your consent and decide that you do not
want your personal information collected or used. If this is the case, you may refuse to offer personal information, or you may withdraw or refuse your consent to your personal information being used.

If you decide to refuse to offer personal information, or you wish to withdraw or refuse your consent to your personal information being used, then you should be aware that we may not be able to process your requests for products and services.

4. Limiting Collection of Personal Information
HDC collects only the information required to provide products and services to you. If the personal information we require is collected for a reason other than to provide products and services, your consent will be obtained before or at the time the information is collected. HDC will collect personal information only by clear, fair and lawful means.
Some web sites use a standard technology called “cookies” to collect information about a user’s previous visit to a site or to save and remember preferences that may have been set while the user was on that particular web site. Cookies are small amounts of data that are sent to your browser and stored on your computer’s hard drive. However, HDC does not retain this information.

Examples of why we collect personal information include:
- to identify you as a customer;
- to understand your needs;
- to provide you with ongoing products and services, establish and maintain communication, and respond to your inquiries;
- to investigate and settle issues you may have;
- to offer you additional products and services, and provide information that may be of interest to you; and
- to comply with legal and regulatory requirements.

Any collection of personal information will be done by fair and lawful means.

5. Limiting Use, Disclosure, and Retention
HDC uses and discloses your personal information only for the purposes it was collected. HDC does not sell or rent personal information to any organization or person for any reason. HDC will not share your personal information with a third party without prior notification to you and obtaining your consent.
HDC retains your personal information only as long as it is required for our business relationship or as required by federal and provincial laws.

6. Accuracy
HDC keeps your personal information up to date, accurate and relevant for its intended use. You may request access to the personal information we have on record in order to review and amend the information, as required. In circumstances where your personal information has been provided by a third party, we will refer you to that party (e.g. credit bureaus). To access your personal information, refer to the "How to contact us" section below.

7. Safeguards
HDC takes several steps to safeguard your personal information, appropriate to
the sensitivity of the information and regardless of the format in which it is held. These steps include:

- physical security measures such as a restricted access facility and locked filing cabinets;
- electronic security measures for computerized personal information such as password protection, database encryption and personal identification;
- organizational processes such as limiting access to your personal information only to those that require access; and
- disposal of personal information no longer required by means of a shredding service.

We require our employees to keep all personal information confidential and comply with our various security measures.

8. Openness
HDC is committed to providing you with clear, understandable and easily available information about its policy and practices related to management of your personal information. To contact us, refer to the “How to contact us” section below.

9. Individual Access
You have the right to request access to your personal information stored by HDC. To contact us, refer to the “How to contact us” section below. Upon receiving such a request, HDC will:

- Inform you about what type of personal information we have on record or in our control, how it is used and to whom it may have been disclosed, if anyone;
- Provide you with access to your information so you can review and verify the accuracy and completeness and request changes to the information; and
- Make any necessary updates to your personal information.

10. Responsibility to Respond to Your Questions, Concerns and Complaints about Privacy
HDC will respond in a timely manner to your questions, concerns and complaints about the privacy of your personal information and our privacy policies and procedures.
How to contact us:

- by contacting HDC’s Privacy Officer at 1-800-265-5190
- by mail to HDC Inc., Attention: Privacy Officer, P O Box 219, Hensall, ON N0M 1X0
- by email to: privacy@hdc.on.ca

As a valued customer of HDC, your privacy is important to us. Any changes or revisions to this policy will be posted on our website: www.hdc.on.ca so please check periodically.