

CULLIGAN OF CANADA, LTD.

EXTERNAL PRIVACY POLICY

Culligan's Privacy Commitment

Culligan of Canada, Ltd. ("Culligan") is committed to maintaining the accuracy, security and privacy of Personal Information in accordance with applicable Canadian privacy laws. This privacy policy ("Privacy Policy") is a statement of principles and guidelines concerning the protection of Personal Information (as defined below) related to Culligan's customers, service providers and other individuals.

Your Consent

BY SUBMITTING PERSONAL INFORMATION TO CULLIGAN OR ITS AGENTS AND SERVICE PROVIDERS, YOU AGREE THAT CULLIGAN MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY APPLICABLE LAWS. Subject to legal and contractual requirements, and reasonable notice, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting Culligan's Chief Privacy Officer (as listed below). If you refuse or withdraw your consent, Culligan may not be able to provide you or continue to provide you with certain services or information which may be of value to you. If you provide us with the personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such individual to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

What is Personal Information?

Canadian privacy laws define personal information broadly as information about an identifiable individual or as information that allows an individual to be identified. For the purposes of this policy, personal information means information about an identifiable individual as defined from time to time in applicable privacy laws ("Personal Information"). Generally speaking, Personal Information does not include what is considered to be business contact information: your name, title or position, business address, telephone number, facsimile number, or e-mail address.

What Personal Information does Culligan Collect, Use and Disclose?

The types of Personal Information that Culligan may collect, use and disclose includes your name, home address, home telephone number and facsimile number, cellular telephone number, personal email address, date of birth, social insurance number, banking and credit information (including information related to past and current banking, annual income, present and past employers, occupation, landlord information, length of time at current residence, spouse and reference information, lines of credit, utilization, guarantees and loans, bank account numbers, credit card numbers and expiry dates), sales account information (including account numbers, facility information, outstanding balances, information related to past, current and projected volume of annual sales and the names and relevant personal information of sales contacts) and franchisee information.

Why does Culligan Collect your Personal Information?

Culligan limits the collection, use and disclosure of your Personal Information, both in the amount and type of Personal Information, to that which is necessary to fulfill the purposes identified within this Privacy Policy.

Culligan will identify the purposes for which your Personal Information is collected at or before the time your Personal Information is collected.

In general, Culligan collects, uses and discloses Personal Information in order to provide Culligan's customers with Culligan's products and services. More specifically, Culligan may collect, use and disclose your Personal Information for the following purposes:

- (a) to consider whether Culligan should establish or continue a commercial relationship with you, including without limitation, to extend credit and to evaluate credit standing, to match credit bureau or credit reporting agency information, to check references and to confer with banking institutions;
- (b) to establish and maintain commercial relations with customers, suppliers, financial institutions and affiliates, to provide ongoing products and services, administer accounts, make and receive payments, and fulfill contractual obligations;
- (c) to understand and respond to website visitors, customers and potential customers needs and preferences, including to communicate with website visitors, customers and potential customers;
- (d) to conduct surveys, contests, promotions, research and statistical analysis;
- (e) to facilitate account inquiries and other customer service assistance;
- (f) to distribute Culligan's newsletters, promotional information, coupons and other material to registrants that have voluntarily enrolled on Culligan's mailing list and/or e-mailing list, including via third party mailing houses;
- (g) to develop, enhance, market, sell, provide and inform you of Culligan's products and services;
- (h) to develop, enhance, market, sell, provide and inform you of products and services of third parties, including Culligan's affiliates and suppliers, with whom Culligan has a commercial relationship;
- (i) to update and verify Culligan's databases and information provided by third parties;
- (j) to monitor communications to ensure the consistency and quality of the products and services of Culligan, Culligan's suppliers, and other third parties with whom Culligan has a commercial relationship;
- (k) to develop and manage Culligan's knowledge-management precedent systems and databases;
- (l) to detect and protect Culligan and other third parties against error, negligence, breach of contract, fraud, theft and other illegal activity, and to audit compliance with Culligan policies and contractual obligations;
- (m) to engage in business transactions, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving Culligan;

- (n) as permitted by, and to comply with, any legal or regulatory requirements or provisions; and
- (o) for any other purpose to which you consent.

To Whom does Culligan Disclose Your Personal Information?

From time to time, Culligan may disclose your Personal Information to:

- (a) service providers, including an organization or individual retained by Culligan to perform functions on its behalf, such as marketing, data processing, document management and office services;
- (b) an organization or individual retained by Culligan to evaluate your creditworthiness or to collect debts outstanding on an account;
- (c) a financial institution, on a confidential basis and solely in connection with the assignment of a right to receive payment, the provision of security or other financing arrangements; or
- (d) a person who, in the reasonable judgment of Culligan, is providing or seeking the information as your agent;
- (e) any other third party or parties, where you consent to such disclosure or where disclosure is required or permitted by law.

Where does Culligan Store Your Personal Information?

Your Personal Information is stored in secured locations and on servers controlled by Culligan, located either at Culligan's offices or at the offices of Culligan's service providers. Culligan retains your Personal Information only for as long as is necessary in order to fulfill the purposes identified within this Privacy Policy, or for as long as may be required to comply with applicable laws.

How do Culligan Protect your Personal Information?

To help protect the confidentiality and security of your Personal Information, Culligan employs administrative and technological safeguards appropriate to the sensitivity of your Personal Information. If your Personal Information is sent to a third party for processing, Culligan make sure, through Culligan's contracts with such third parties, that all of your Personal Information is kept secure. Culligan also operate secure data networks protected by industry standard firewall and password protection systems. Your Personal Information is kept as accurate, complete and up-to-date as is necessary to fulfill the purposes identified in this Privacy Policy. Culligan do not routinely update your Personal Information.

Privacy and Culligan's Website

- (a) **Cookies** - When an individual visitor accesses the Culligan website, Culligan may use a browser feature called a 'cookie' to collect information such as the type of Internet browser and operating system the visitor uses, the domain name of the website from which the visitor came, date and duration of the visit, number of visits, average time spent on Culligan's website, pages viewed and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies the visitor's browser, but not necessarily the visitor, to Culligan's computers each time Culligan's website is visited. Unless a visitor specifically informs us (e.g. by registering for an event or sending us correspondence from the website), Culligan will not know who the individual visitors are. In addition to the identified purposes described in Culligan's Privacy Policy, Culligan may use this website information and share it with other organizations with whom Culligan has a commercial relationship to measure the use of Culligan's website, to improve the functionality and content of the website and to facilitate usage by a visitor. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on Culligan's website.
- (b) **Online Communications** – In order to provide Culligan's website visitors with a service or information, visitors may voluntarily submit Personal Information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, participating in a seminar or other event, and participating in contests and surveys. If you are known to Culligan as a registered user of an online service, Culligan may combine and store Personal Information about your use of Culligan's website and the online information you have provided with certain other online and offline information Culligan may have collected.
- (c) **E-Mail Communications** - Occasionally, Culligan may send marketing or promotional e-mail communications to you with information that may be useful, including information about the services of Culligan and other third parties with whom Culligan have a relationship. Culligan will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future marketing or promotional e-mails from Culligan.
- (d) **Links** - Culligan's website may contain links to other websites which are provided as a convenience only. Visitors are advised that other third party websites may have different privacy policies and practices than Culligan, and Culligan has no responsibility for such third party websites.

How can you Obtain Access to Your Personal Information?

Upon your written request, and subject to certain exceptions, Culligan will inform you of the existence, use, and disclosure of your Personal Information and will give you access to that information. Access requests should be sent to Culligan's Chief Privacy Officer using the contact information outlined below.

If access to your personal information is denied, Culligan will notify you in writing, give reasons for the denial, and inform you of the recourses open to you. If access is granted, Culligan will give you a reasonable opportunity to review your Personal Information. Your Personal Information will be provided to you in an

understandable form within a reasonable time, generally within 30 days. Culligan may extend such 30 day period by up to an additional 30 days if meeting the time limit would unreasonably interfere with the activities of Culligan or the time required to undertake any consultations necessary to respond to your request would make the time limit impracticable to meet. You will be able to challenge the accuracy and completeness of your Personal Information and have it amended as appropriate.

Changes to Culligan's Privacy Policy

Culligan reserves the right to modify or supplement this Privacy Policy at any time. If Culligan make a change to this Privacy Policy, Culligan will post such changes on Culligan's website at www.culligan.ca and make such revised policy and changes available upon request to the Culligan Chief Privacy Officer. However, Culligan will obtain the necessary consents required under applicable privacy laws if it seeks to collect, use or disclose your Personal Information for purposes other than those for which your consent is obtained unless otherwise required or permitted by law.

How can you Obtain Further Information Regarding this Policy?

Culligan has appointed **Tracy Carnahan** as its Chief Privacy Officer to oversee compliance with this Privacy Policy and applicable privacy laws. For more information on Culligan's privacy practices, please visit Culligan's website or contact Culligan's Chief Privacy Officer at:

Culligan Chief Privacy Officer

**580 Park Street
Regina, SK
S4N 5A9
Tel: 306 761 3253
Fax: 306 761 3382
Email:**

Changes to this Privacy Policy will be noted here so that you can be fully informed about Culligan's privacy policies and practices.

Date last revised:

Description of Revision: