

Dempsey Corporation Data Privacy Policy

Effective Date: March 3, 2024

Prepared by: VP - IT

Version: Public Web Version

Our Commitment to Privacy

At Dempsey Corporation, we value and protect the personal information of our employees, customers, suppliers, and partners. This policy outlines how we collect, use, store, and protect personal information in compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA) and other applicable Canadian privacy laws.

This policy applies to all Dempsey business units and online services, including interactions through our website, client portals, and internal systems.

Scope of This Policy

This policy governs personal information collected during:

- Employment and HR management
- · Client and supplier interactions
- Website and online form submissions
- Marketing communications (with consent)

It applies to all Dempsey employees, contractors, and service providers handling personal information.

What Information We Collect

We may collect the following types of personal information, as appropriate to the interaction:

- Name, title, and business contact information
- · Email address and phone number
- Billing and shipping details
- Employment or application-related information
- Any other information voluntarily submitted via forms or communications

We do not knowingly collect sensitive personal data (e.g., race, religion, or medical history) unless legally required or explicitly authorized with consent.



Dempsey Corporation Data Privacy Policy

Why We Collect Personal Information

We only collect personal information for specified and legitimate purposes, including:

- · Providing and managing products and services
- Responding to inquiries or support requests
- Administering employment or recruitment processes
- Managing supplier or partner relationships
- Complying with legal, audit, or contractual requirements

Consent and Control

We will only collect, use, or disclose personal information with your knowledge and informed consent, except where otherwise permitted or required by law.

You have the right to:

- Refuse to provide certain personal information
- Withdraw your consent at any time (subject to legal or contractual limitations)
- Request access to your personal data or request corrections

How We Protect Your Information

Dempsey uses physical, administrative, and technical safeguards to protect personal information from unauthorized access, disclosure, or misuse. Measures include:

- Role-based access control
- Secure servers and encrypted data storage
- Employee training on privacy and cybersecurity
- Mandated use of Password generating and management software
- Secure destruction of outdated records

Access to personal information is limited to staff with a need-to-know basis, and third-party service providers are required to uphold equivalent security standards.



Dempsey Corporation Data Privacy Policy

Third-Party Disclosure

We do not sell or trade personal information. We may share limited information with:

- Trusted service providers who assist in business operations
- Legal authorities, when required to comply with the law
 All third parties must agree to protect personal information consistent with our standards.

Website Cookies and Analytics

Our website may use cookies or analytics tools to enhance user experience. These technologies collect anonymized data to understand website usage trends and improve performance. You may manage or disable cookies through your browser settings.

How to Contact Us

For questions or concerns regarding this policy or your personal information, contact:

VP - IT

Dempsey Corporation

sustainability@dempseycorporation.com