

Bolongo Surplus Ltd. Privacy Policy

Introduction

Bolongo Surplus Ltd. (“**Bolongo**”) is committed to respecting the privacy rights of all its current, past and prospective Members (“**Members**”). This Privacy Policy affirms our commitment to privacy. It describes how the Personal Information of Customers is collected, used and disclosed.

Personal information is defined as information about an identifiable individual as set out in the Personal Information Protection and Electronic Documents Act (“**PIPEDA**”). Personal information can include things such as a Member’s name, address, telephone number, email address, date of birth, transaction history, company and job title.

Scope

This Privacy Policy applies no matter how Members choose to interact with Bolongo, whether in person, online, by mail or over the telephone.

We may use:

- third-party analytics tools to help us measure traffic and usage by Members;
- cookies or similar technologies to collect information about how Members use the website;
- log file information that is reported by a Member’s browser each time you make a request to access our webpage;
- device identifiers which allow us to access, collect, monitor a mobile device; and
- metadata provided by Members.

The Ten Principles of Privacy

This Privacy Policy complies with the requirements as set out in PIPEDA. These are the Ten Principles of Privacy as follows:

1. Accountability

Bolongo is responsible for the Personal Information under its control and will designate Bolongo personnel to ensure organizational accountability for compliance with the Ten Principles of Privacy.

All Bolongo employees are accountable for the protection of Members’ Personal Information.

2. Identifying Purposes

Bolongo will identify the purposes for which Personal Information is collected at or before the time the information is collected.

3. Consent

Consent is required from Members for Bolongo's collection, use or disclosure of Personal Information, except where required or permitted by PIPEDA or other law. In addition, when Members use the services offered by Bolongo, consent is deemed to be granted.

Express consent may be obtained verbally, in writing, or through electronic means. Alternatively, consent may be implied through the actions of Members or continued use of services following Bolongo notification of changes.

4. Limiting Collection of Personal Information

Personal information collected will be limited to that which is necessary for the purposes identified by Bolongo.

5. Limiting use, disclosure and retention

Bolongo will not use or disclose Personal Information for purposes other than those for which the information was collected, except with the Members' consent or as required by law.

Bolongo will retain personal information only for as long as is necessary to fulfill the purposes for collecting such information and compliance with any legal requirements. Bolongo employs retention standards that meet these requirements. Bolongo will destroy Personal Information when it is no longer required.

6. Accuracy

Personal Information will be maintained by Bolongo in an accurate, complete and up-to-date format as is necessary for the purpose(s) for which the Personal Information was collected and is to be used.

7. Safeguards

Bolongo will protect Personal Information with security safeguards appropriate to the sensitivity of such information.

8. Openness

Bolongo will make readily available its policies and practices relating to the collection and management of Personal Information.

9. Member Access

Bolongo will inform Members of the existence, use and disclosure of their Personal Information and will provide access to their Personal Information, subject to any legal restrictions.

Bolongo may require written request for access to Personal Information and in most cases will respond within 30 days of receipt of such requests. Members may verify the accuracy and completeness of their Personal Information, and may request the Personal Information be corrected or updated, if appropriate.

10. Challenging Compliance

Customers are welcome to direct any questions or inquiries concerning Bolongo's compliance with the Privacy Policy to Info@bolongo.ca.

What Types of Personal Information May be Collected and Used

In providing services to Members, Bolongo may need to collect Personal Information. In most cases, consent to do so is granted by the Member when registering as a Member on www.bolongo.ca.

The following information may be collected from any source (this is not an exhaustive list):

- contact information such as your name, address and telephone number; and
- information about authorized persons when dealing with a legal entity such as a corporation.

Bolongo may monitor and record telephone calls or other communications between you and our representatives to ensure service quality and security and to confirm our discussions with you.

Why Bolongo Collects Personal Information

Bolongo may review and analyze information which is provided by or collected about Members for the following purposes:

- Verify Member identity;

- Understand Member needs;
- Determine the suitability and eligibility of Services to the Member;
- Send Members information about products and services;
- Set up and manage services;
- Provide Services on an ongoing basis;
- Meet legal and regulatory requirements;
- Manage and assess our risks and to prevent or detect fraud or criminal activity.

Disclosure of Members Personal Information

While providing Services, Bolongo may:

- Contract certain service providers approved by Bolongo and allow them to access personal information. All third parties who may have access to personal information are bound by strict contractual obligations designed to protect the privacy and security of your personal information.
- Share personal information with any of Bolongo's affiliates who may use such personal information as permitted by law and their privacy policies.
- Disclose personal information as required by statute or by court order, or as may be permitted by PIPEDA.

Your personal information is used for proper purposes only

Bolongo will safeguard your personal information and use it only for the purpose(s) it was collected or as permitted under applicable laws and this privacy policy. Bolongo will not sell, lease or give away your personal information.

Refusing or Withdrawing Consent

Subject to some restrictions, Members can at anytime refuse to consent, or continue to consent to the collection, use or disclosure of their Personal Information by notifying Bolongo.

Withdrawal of consent may impact Bolongo's ability to provide or continue to provide Services. Members cannot refuse collection, use and disclosure of their Personal Information if such Personal Information is required to:

- Fulfill the terms of any contractual agreement made by the Member;
- Be collected, used or disclosed as required by any law; or
- Be collected, used or disclosed as required by any regulators, including self regulatory organizations.

Questions, complaints and access

If you need to update or correct your address, phone number or payment information please contact Bolongo at info@bolongo.ca.

If you wish to make an access to information request to view your Personal Information, or if you have questions, concerns, or complaints, please contact the following in writing:

If the above steps fail to resolve your concern you may also contact the Office of the Privacy Commissioner of Canada:

Place de Ville
112 Kent Street, 3rd Floor
Ottawa, ON
K1A 1H2
Call toll free at 1.800.282.1376
www.privcom.gc.ca

Fees

Bolongo may charge, in accordance with applicable laws, a reasonable fee for access to Personal Information and for providing copies of Personal Information requested.

Amendments

You acknowledge that we may amend this agreement from time to time to take into consideration changes in legislation or other issues that may arise. We will post the revised agreement at www.bolongo.ca and may make printed copies available.