

# Privacy Policy

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## 1. INTRODUCTION

This policy applies to Sparton of Canada Limited, dba as Stealth / Stealth.com / Stealth Computer.

In this Policy “we” or “us” refers to Stealth and our affiliates. All services mentioned are services and interactions provided by Stealth. “You” refers to anyone who visits our website(s) (stealthcomputer.com, our “Website”), our customers, clients, and any individual who purchases a product from us and engages with our services.

For the purposes of this Policy, “personal information” means information that can identify an individual directly or is information about an identifiable individual. This does not include business contact information that is used for the purpose of communicating or facilitating communication with an individual in relation to their employment, business, or profession or in relation to information about Stealth employees in their employment capacity.

Stealth wants You to understand how we use the information You provide to us. We take data protection seriously and safeguarding the privacy of customers’ and Website visitors’ is important to us. This policy (Privacy Policy or Policy) sets out the basis on which any personal information we may collect from you, or You provide to us, will be processed and used by us. It also describes how we use cookies and how You can manage them.

We regularly review our policies and any changes will be posted on our Website.

Providing personal information or authorizing a third party to disclose personal information to us after the terms of this Policy have been brought to your attention signifies your consent to our collection, use and disclosure of personal information in accordance with this Policy.

You have the right to withdraw your consent from us collecting and using your personal information, but this may limit our ability to provide You with some of our products or services.

## 2. INFORMATION WE MAY COLLECT ABOUT YOU AND WHY

Personal information may be collected in a number of ways, including: our Website, in person, over the phone, by mail, by fax, by email, our applications or other software, social media, and from third parties whom You have authorized to disclose personal information to us.

If You provide information about a third party or authorize a third party to do so, we will assume You have taken proper measures to obtain informed consent. We will not process more information about You than is reasonably necessary to achieve the purposes we have set out herein. We may process the following data about you:

- your name and contact details, such as your address, telephone number and email address
- employment details such as the name of the company You work for, your work contact details (address, email, phone number) and job title

- account details such as any products and services You have purchased and how they are used, contractual agreements, transactional and financial details and passwords
- any information provided when You report a problem with our Website
- your communications with us (including email, live chat and phone conversations)
- your responses to any surveys You may complete
- details of your visits to our Website including, but not limited to, cookie data, traffic data, location data, weblogs, analytical data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that You access
- computer information including device type, device identifier, IP address, MAC address, browser type, operating system, duration of use, user behavior, length of time spent on our Website, frequency of landing on our Website
- information used to verify your identity such as photographic ID or data obtained via a credit reference check (which is done in certain circumstances when financing, lending or payment plans are entered into). other information You voluntarily provide to us, our employees, our contractors, or our affiliates

The provision of some data is a business requirement or a requirement necessary to enter into a contract. You are not obliged to provide this data, but if You do not, we may be unable to enter into a contract with You or fully perform the transaction we have entered into with you. In some cases, it may lead to the termination of your business with us.

We will collect this information directly from You and in limited instances from third-party partners such as Google as they provide Google analytics, LinkedIn, PayPal in relation to credit card payments made to us, and credit monitoring companies for purposes set out herein.

### **3. USES MADE OF THE INFORMATION**

We may use information held about You in the following ways:

- to provide You with information, products or services that You request from us or which we feel may be of interest to you, where You have consented to be contacted for such purposes
- to ensure that content from our Website is presented in the most effective manner for You and for your computer
- to maintain and improve our products and services and otherwise running and maintaining our business in the ordinary course
- to provide newsletters or other communications to which You have subscribed or may be interested
- to administer surveys, contests, draws, raffles, and other promotional materials

- to assist You when You contact customer support services, including to direct your questions to appropriate individuals, and to investigate and address any of your concerns
- to audit the usage of our Website
- to carry out our obligations arising from any business entered into between You and us
- for training purposes, quality assurance or to record details about the products and services You order from us
- to satisfy and meet our legal and regulatory requirements
- to allow You to participate in interactive features of our services, when You choose to do so
- to notify You about changes to our products and services
- to carry out credit and fraud prevention checks, when financing, lender or payment plans are entered into
- to carry out market research
- to defend or bring claims

#### **4. RETENTION AND ACCURACY OF PERSONAL INFORMATION**

We will only retain your personal data for as long as is reasonably necessary and otherwise in accordance with this Policy. The retention period will vary depending on the type of personal data concerned. In order to determine the retention period, we consider the nature of the personal data, the purpose(s) for processing it, your relationship with us, any legal and regulatory requirements and any industry standards and guidelines. If You have previously held an account with us and return, we may link your data to your previous account, which will also affect the retention period.

We make every reasonable effort to keep your personal information as accurate, complete and up-to-date as necessary. If desired, you may verify the accuracy and completeness of your personal information in our records. Despite our efforts, errors sometimes do occur. Should You identify any incorrect or out-of-date information in your file, let us know and we will remedy any such errors on a timely basis, if appropriate.

#### **5. DISCLOSURE OF YOUR INFORMATION**

We may disclose and share your personal information within our company Sparton of Canada, Limited dba Stealth for purposes of administrative support.

We may also share information with third parties in order to assist with the services and products we are providing to You, such as business partners, contractors and affiliates, network operators, customer service providers, credit and fraud protection agencies, payment transaction services, storage companies, transportation companies, cloud storage providers, data analytics providers, and payment processors. As You can imagine, some of these parties are located in, or otherwise process information in, jurisdictions outside Canada such as the

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United States. Please see our section below on “**Disclosures Outside of Canada**” for further information in this regard.

Personal information provided to our payment processors may be stored outside of your jurisdiction of residence.

In the event that the business is being sold, merged, reorganized or similar, we may disclose your data to prospective buyers.

Where we share your personal data with other organizations, we will take all reasonable measures to ensure it is properly protected.

We may also disclose your personal information to third parties if we are under a duty to disclose your personal information in order to comply with any legal or regulatory obligation; in order to enforce or apply our terms and conditions and other agreements; or to protect the rights, property, or safety of our customers or others.

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.

## **6. DISCLOSURE OUTSIDE CANADA**

When personal information is stored or otherwise processed outside Canada, as set forth herein, your personal information may be subject to the laws of those jurisdictions, including laws that permit the disclosure of personal information in response to valid demands or requests from government authorities, courts, or law enforcement in other countries.

## **7. IP ADDRESSES AND COOKIES**

### **7.1 IP addresses**

We may collect information about your computer including, where available, your IP address, operating system and browser type for system administration. This is statistical data about our users’ browsing actions and patterns and does not personally identify any individual.

### **7.2 Cookies**

Cookies are small pieces of information in the form of text files that are sent to your browser from our web server and are stored on your device.

We do not store any personal information in the cookie; they are designed only to collect information of an anonymous nature. We will not combine such anonymous information with your personal details.

Our Website uses cookies to recognize your device and store information about your preferences or past actions, which help make your future Website visits to us more

efficient. Save for the use of cookies, we do not automatically log data or collect data. You can set your computer browser to reject cookies, but this may preclude your use of certain parts of our Website.

Some cookies are essential to using the Website and others improve user experience of the Website. Below are some examples of how we use cookies to do this:

- to gather information which allows us to identify your platform and record enquiries so we may improve customer experience and identify issues on the Website
- to help ensure You are provided with correct and useful information during your visit to our Website
- to collect data which allows us to improve our services based on your purchases and Website usage

### 7.3 Cookies in Use

The cookies we use on our Website may include both direct and third-party cookies. Some cookie examples may include but not limited to your Account/Login information, Live Chat, Social Media, Google Advertising and Analytics and Caching (website speed performance). For more information about cookies please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### 7.4 How to Reject and Manage Cookies

You can choose not to allow cookies in your browser settings. How You do this will depend upon the browser You are using. More information on cookies, their use and how to accept or reject them can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

As our cookies are largely aimed at improving the user experience on the Website, You may find that if You block certain cookies You may experience deterioration in the service You receive.

## 8. PROTECTING YOUR CREDIT CARD INFORMATION

Credit card information provided by You to Stealth will be handled in a secure and confidential manner. Our employees may handle such information only when there is an appropriate business reason to do so, such as taking an order by phone or when a refund must be issued back to the credit card.

## 9. DATA SECURITY

Stealth will maintain security procedures that contain administrative, technical, and physical safeguards appropriate to the complexity, nature, and scope of its activities. Stealth's security procedures shall be designed to protect the security and confidentiality of User Data against unlawful or accidental access to, or unauthorized processing, disclosure, destruction, damage or loss of User Data.

We maintain physical, electronic and procedural safeguards to protect your information, and our employees are required to follow these privacy standards. At a minimum, Stealth's security procedures shall include:

- a) limiting access of User Data to authorized persons
- b) Implementing network, application, database, and platform security
- c) Means for securing information transmission, storage, and disposal within Stealth's possession or control
- d) Means for encrypting User Data stored on media within Stealth's possession or control by using modern acceptable cyphers and key lengths, including backup media
- e) Means for encrypting User Data transmitted by Stealth over public or wireless networks by using modern acceptable cyphers and key lengths, and
- f) Means for keeping firewalls, routers, servers, personal computers, and all other resources current with appropriate security-specific system patches

Stealth shall ensure that its security measures are regularly reviewed and revised to address evolving threats and vulnerabilities.

On our Website your payment and credit card information are always safe. Our Website uses Secure Sockets Layer (SSL) software as default for all pages which provides a safe environment for securing commercial transactions. SSL used on our Website encrypts all of your personal information, including credit card number, name, and address so that it cannot be read over the internet. For more information about SSL please visit <http://info.ssl.com/article.aspx?id=10241>.

## 10. COPPA (CHILDREN ONLINE PRIVACY PROTECTION ACT)

When it comes to the collection of personal information from children under the age of 13 years, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces COPPA, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under the age of 13 years.

Customers purchasing goods or services on Stealth's Website must be at least 18 years of age.

## 11. CAN-SPAM ACT

The CAN-SPAM Act is a law of the United States that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out penalties for violations. We may collect your email address in order to:

- send information, respond to inquiries, and/or other requests or questions
- market to our mailing list or continue to send emails to our clients after the original transaction has occurred

If you wish to unsubscribe from future emails, You can do so by contacting us via email at [Newsletter@stealth.com](mailto:Newsletter@stealth.com), and putting "Unsubscribe" in the title and we will promptly remove you from our mailing list.

You can find out more about CAN-SPAM here: <https://www.ftc.gov/tips-advice/business-center/guidance/can-spam-act-compliance-guide-business>

## 12. CASL COMPLIANCE

Canada's Anti-Spam Legislation (CASL) is a Canadian law that, among other things, regulates the communication of commercial electronic messages (emails, DMs, texts etc.) ("CEMs"). Stealth is committed to reducing the harmful effects of spam and related threats to electronic commerce. Stealth is committed to complying with CASL. Stealth may communicate with You via electronic messaging for purposes of letting You know about new products, goods or services, provide You with newsletters, and otherwise to communicate about transactions and the relationship between You and Stealth.

Except in limited instances, You can unsubscribe from receiving CEMs from Stealth. If you wish to unsubscribe from future emails, You can do so by contacting us via email at [Newsletter@stealth.com](mailto:Newsletter@stealth.com), and putting "Unsubscribe" in the title and we will promptly remove you from our mailing list.

## 13. INDIVIDUAL RIGHTS.

Individuals have certain rights regarding their personal information and Stealth respects and honours those rights. Subject to certain exceptions:

- an individual may request that an organization delete all data on that individual without undue delay
- an individual may prohibit certain data uses by easily being able to opt-in and opt-out of activities
- an individual may ask to restrict or "block" the processing



- individuals have the right to rectification, wherein Individuals may request that incomplete data be completed, or that incorrect data be corrected
- individuals have the right to know what data about them is being processed and how
- in some jurisdictions (EU for example), individuals may request that personal data held by one organization be transported to another.

## **14. YOUR RIGHTS AND HOW TO CONTACT US**

Often, how we deal with privacy and data subject rights will be through our business as usual processes. There are some rights that we will always comply with, such as an objection to receiving direct marketing. However, we are not obliged to comply with all requests we receive. If there is a legitimate reason why we cannot comply with a request You make, for example a legal requirement to retain your data, even if You have requested that we delete it, we will let You know.

We aim to respond to You within one month (30 days) of receiving your request. However, we are permitted to extend this timeframe if necessary or required. If this is the case, we will let You know within a month (30 days) of receiving your request.

We will not charge You for exercising your rights, unless the request is manifestly unfounded or excessive, in which case we may charge a reasonable fee for our administrative costs or refuse to act on your request. We may also charge a reasonable fee for additional copies of data. We may require identification from You before we can consider your request. If identification or a fee is required, or we are refusing to act on your request, we will let You know without undue delay.

If You have any questions about this Policy, the practices, or your dealings with Stealth or if you would like to exercise any of your rights You can contact us at [privacy@Stealth.com](mailto:privacy@Stealth.com).

## **15. AMENDMENTS TO PRIVACY POLICY**

The date this Policy is effective is noted by the Effective Date at the beginning of this Policy. This Policy may be modified from time to time due to changes in legal or regulatory requirements or for other reasons. We reserve the right to make such changes. The effective date of any such material changes will be noted by the change in the Effective Date at the top of this Policy.

Any material changes will be posted on our Website, and we may also notify You by email or other means. Material changes to this Policy will be binding after such changes have been introduced and notice provided. We may assume that You have provided your consent from your continued patronage of our products or services.

## **16. LINKS TO THIRD PARTY SITES**

Any links from our Website to other websites are provided merely for your convenience and do not imply our endorsement of the content or the provider. If You follow a link to any of these

websites, You do so at your own risk, and we do not accept any responsibility or liability for the content of such websites. Our Website and any of our applications available from our Website or third-party platforms are governed by the provisions and practices stated in this Policy. Our website and such applications may contain links to third-party sites or applications that are not governed by this Policy. Although we endeavour to only link to sites or applications that share our commitment to your privacy, please be aware that this Policy will no longer apply once You leave our Website or such applications, and that we are not responsible for the privacy practices of third-party sites or applications. We therefore suggest that You closely examine the respective privacy policies of third-party sites and applications to learn how they collect, use and disclose your personal information.

## **17. GOVERNING LAW**

This Policy and any disputes arising from it shall be interpreted in accordance with the laws of the Province of Ontario and all applicable federal laws of Canada.