

Epak | HomeGuard | Privacy Policy

We at EPAK Inc. and its parents, subsidiaries, divisions and affiliates (“us”, “we”, “our”, or “EPAK”) understand that you are entrusting us with your information when you buy our products and use our services. We take your privacy concerns seriously.

This Privacy Policy (“Policy”) is meant to help you understand (i) what information we collect from you or that you may be asked to provide when you visit our websites, use our mobile application, visit one of our branches, call, email or send other communications with us, or request other products or services from us (collectively, the “Services”), (ii) why we collect it, and (iii) how you can update, manage, and delete your information. By using the Services, you consent to the practices described in this Policy, unless further consent is required by applicable law.

Please read this Policy together with any service-specific or location-specific privacy notices that we may provide. Those notices supplement this Policy, and to the extent they differ from this Policy, the notices shall govern. For example, if you are a California resident, please see the [CCPA Privacy Notice](#) that we have adopted pursuant to the California Consumer Privacy Act of 2018.

Updated: September 14, 2021.

Personal Information We Collect

We collect information to provide better products and services to all of our customers and vendors — from determining out what type of drywall is best suited for your project to where and when to deliver materials for your project. The information we collect, and how that information is used, depends on which Services you request from us.

Generally speaking, your “personal information” includes your unique identifiers (for example, full name, phone number, or email address); and information about your characteristics, conditions or behavior that is associated with one of your identifiers or could otherwise reasonably be linked to you. “Non-personal information,” on the other hand, is information that has been anonymized or de-identified such that it cannot reasonably be linked to an individual.

The personal information that we may collect includes:

Information You Provide to Us.

We may ask you for some or all of the types of information listed below when you open an account with us; request a quote from us; fill out our credit applications; subscribe to our newsletters; search, shop for, or purchase our products and services online or at one of our branches; return a product or request a rebate; request or submit payments to or from us; directly contact us with questions or feedback; submit information via our websites, mobile websites or applications; or apply or inquire about employment:

Contact information.

We may collect the names of our customers and vendors. Additionally, we may collect your username, billing and shipping addresses, phone numbers, email addresses, government-issued

identification number, and other digital contact information. We may also collect information that you provide us about your contractors and your projects.

Commercial Information.

When you purchase our products or services (such as when you make a purchase for suspended ceiling systems to be delivered in two days), we collect information about the purchase or transaction, including project or job information, general contractor name and contact, materials required for the project and when delivery needs to be made, browsing history, search history, purchase history, and information about your interaction with our websites, applications, electronic communications, or advertisements. For government or prevailing wage jobs, we may obtain government certifications, bond information, contractor licenses, and LCP tracker account numbers.

Payment information.

We may collect payment information from our customers such as your credit or debit card number and other card information; federal taxpayer number; other account and authentication information; and billing, shipping and contact details. When you apply for credit, we might collect information related to your application.

When we purchase products or services or lease properties from you, we collect payment information to be made to you, including bank name, bank address, bank account, and bank routing number.

Demographic information.

We may collect information about products or services you prefer or which branches you make your purchases from.

Location information.

If you purchase our products for delivery, we may collect location data of your jobs. If you use our websites, we may collect location data obtained from your IP address.

Video recordings.

When you visit our branches or when our trucks deliver your products, we may collect in-store CCTV and other video recordings.

Property information.

We may collect property information of our landlords, including real property measurements, lot size, square footage, public record information, ownership information, property value, and property tax.

Job Application Information.

Information you submit in connection with a job application, including the types of information described above, plus other examples such as employment status; employment history; education information; references; resume; immigration status and ability to work legally in the US; personal or family employment affiliation with EPAK; criminal record; and — on a voluntary

basis, for our Equal Employment Opportunity compliance purposes for jobs located in the US — gender, race and ethnic background.

If you decline to provide requested information, we may not be able to provide one or more Services to you.

Information Logged Automatically. When you access and use our websites and mobile application, computer servers may automatically log certain information about you or your device, including:

- internet protocol (IP) address
- device ID, operating system, browser type
- browsing history
- location data

Some of this information is recorded through the use of “cookies” and similar technologies. Please review our Cookie Notice for more information about how our websites use cookies and similar technologies.

Information We Collect by Automated Means Offline. We use video monitoring and recording at EPAK’s branches to enhance security and protect against theft and other crimes.

Information Received From Other Sources. We may obtain information about you from other sources, including our service providers. Examples of third parties may include shipping companies, social media platforms, public record resources, payment processing companies, manufacturers, and supplier of product information. We combine such information with information we may have collected about you. To the extent the information, alone or in combination, constitutes personal information, we will treat it as personal information as described in this Policy. We are not responsible for the accuracy of any information provided by third parties.

How We Use Personal Information

We may use your personal information for a variety of business purposes, including to:

- process and deliver your orders and returns;
- customer care;
- process your requests to receive information about our products;
- determine eligibility and grant of credit;
- process your invoice or payment;
- establish and service your account with us;
- provide any other services you have requested;
- customize your experience on our website and other online Services;
- respond to your inquiries;

- communicate with you;
- contact you about products or services we think may be of interest to you and personalize your digital content;
- deliver marketing communications and advertising;
- improve our products and services and learn about customer trends and interests;
- contact you with surveys, legal notices or other information that may be relevant to your use of the Services;
- identify the devices you use to access digital content;
- detect, investigate or prevent activities that may violate our policies, threaten the security of our Services, or may be fraudulent or illegal;
- with respect to information, we collect through our job applications, evaluate your application for employment and contact you regarding possible employment;
- comply with our legal obligations; or
- as otherwise described to you at the point of collection or pursuant to your consent.

How We Share Personal Information

We do not sell personal information. We do not disclose your personal information to others except as follows:

- Corporate parents, affiliates and subsidiaries. We may share your information with our corporate parents, subsidiaries, and other affiliated entities for a variety of purposes, including business, operational and marketing purposes.
- Service providers. We may share your information with our third-party service providers that perform certain functions or services on our behalf, such as to fulfill and track orders, deliver products, facilitate payments, host our website, manage databases, perform analyses, conduct surveys, investigate fraudulent activity, provide customer service, or send communications and newsletters for us. Our agreements with those providers require them to limit their use of such personal information to the uses we have authorized and to comply with applicable laws regarding protection of personal information.
- Marketing partners. Consistent with applicable law, or with your consent, we may share your personal information with marketing partners to support our targeted advertising efforts on other websites and online services.
- Mandatory disclosures and legal proceedings. We may have a legal obligation to disclose personal information to government authorities or other third parties pursuant to a

valid regulatory request, subpoena, litigation demand or court order. We may also need to disclose and otherwise process your personal information in accordance with applicable law to defend our legitimate interests, for example, in civil or criminal legal proceedings.

- Mergers and Acquisitions. If we decide to sell, buy, merge or otherwise reorganize our businesses, this can involve us disclosing personal information to prospective or actual purchasers and their advisers, or receiving personal information from sellers and their advisers.
- Pursuant to your consent. We may share your personal information with others if we have your consent to do so.

One of the services we use is Google Analytics, which helps us evaluate the use of our Websites. We use Google's tools to gather non-personal information to help us improve our Services and user experiences. Google may use cookies and other technologies to perform their services, and they may combine the information they collect about you on our website with other information they have collected for their own purposes. This Policy does not cover such uses of data by Google or other third parties. For information about Google's privacy practices, please click here: www.google.com/policies/privacy/partners/.

Quality and Retention of Personal Information

We take reasonable steps to keep the personal information we possess accurate and to delete incorrect or unnecessary personal information. We retain personal information only as long as necessary to fulfill the purposes outlined in this Policy or otherwise communicated to you, unless a longer period is required by applicable law.

Data Security

In order to safeguard personal information against unauthorized access, removal, theft, or disclosure, we implement and maintain administrative, physical and technical security procedures and practices appropriate to the nature of the information and reasonable in light of industry standards and our particular operations, risks and resources. We regularly assess the performance and adequacy of those procedures and practices and will adjust them when new standards, operations or risks require it. Unfortunately, in our increasingly connected digital world, no one can guarantee perfect data security, and we cannot promise that our procedures and practices will always prevent a breach of personal information. Should we detect such a breach, we will promptly notify affected individuals, third parties and law enforcement agencies as required by applicable law.

While we use industry standard means to protect our websites and your information, the Internet is not 100% secure. The measures we use are appropriate for the type of information we collect. We cannot promise that your use of our websites or mobile applications will be completely safe. We encourage you to use caution when using the Internet. Online access to

your personal information is protected with a password you select. We strongly recommend that you do not share your password and that you use unique passwords for all of your online accounts.

We encourage you to help maximize security by applying your own personal security measures. For more information about what you can do to protect your data, please see the tips and resources offered by the U.S. Federal Trade Commission at <https://www.consumer.ftc.gov/topics/privacy-identity-online-security> and the California Attorney General at <https://www.oag.ca.gov/privacy/consumer-privacy-resources>.

“Do Not Track” Signals

The web browsers and applications that you use to visit our Website and Services may provide certain “Do Not Track” capabilities. Generally, browsers that have these features enabled send a signal to websites that inform the site operator that you do not wish for the site to track you. We do not respond to these signals because there is not yet a common understanding of how to process these signals or a consensus on what “tracking” means.

Links to Social Media and Other Third-Party Services

Our Services may contain links to third-party websites, products or services. For example, our websites contain links provided by Facebook, Twitter, Instagram and other social media platforms that you can use to post directly from our website. Information collected by those third parties is governed by their privacy policies, not ours. We encourage you to learn about the privacy practices of those third parties.

Protecting Children’s Privacy Online

Our Services are not intended for children (individuals under the age of 13). We do not knowingly collect, maintain, or process personal information from children without parental consent. Visit the Federal Trade Commission website for more information about protecting children’s online privacy: <https://www.ftc.gov/tips-advice/business-center/privacy-and-security/children%27s-privacy>.

Changes to This Statement

We will update this Policy at least once every 12 months to reflect changes in applicable law, our privacy practices, or our Services. We will notify you of material changes, and you should periodically review this Policy to remain aware of our current practices.

Contact Us

If you have any questions or concerns about this Policy or our practices, or wish to exercise your rights regarding your personal information under applicable law, please contact us directly at custserv@epak.ca.