

RUGBY ARCHITECTURAL BUILDING PRODUCTS PRIVACY POLICY

Your privacy and personal information are very important to us. The personal information that **RUGBY ARCHITECTURAL BUILDING PRODUCTS**. ("**Rugby**", "**Us**", "**us**", "**our**", "**Our**", "**We**" and "**we**") collects about you ("**You**", "**you**", "**Your**", "**your**", or the "**User**") is managed in accordance with this Privacy Policy ("**Policy**" or "**Privacy Policy**"). Rugby makes available certain websites to its customers, including an ecommerce website for customers to complete purchases and make payments. This Privacy Policy applies to the collection, use and disclosure of your personal information, including personal information relating to and collected in connection with your use of any Rugby website that you access (collectively, the "**Websites**" and individually a "**Website**").

BY SIGNING UP TO USE A WEBSITE, BY CREATING OR LOGGING INTO AN ACCOUNT ON A WEBSITE, OR BY MAKING ANY OTHER USE OF THE WEBSITES, YOU AGREE AND CONSENT TO THE PRACTICES AND POLICIES DESCRIBED IN THIS POLICY. IF YOU DO NOT AGREE TO THE PRACTICES AND POLICIES DESCRIBED IN THIS POLICY, DO NOT USE THE WEBSITES, CREATE AN ACCOUNT ON THE WEBSITES, PLACE ORDERS OR MAKE PAYMENTS THROUGH THE WEBSITES, OR OTHERWISE USE THE WEBSITES.

The Websites are available only to, and may only be used by persons who can enter into legally binding contracts under applicable law. Without limiting the foregoing, the Websites are not available to minors. If you are under the age of majority in your jurisdiction, please do not use the Websites.

1. PRIVACY COMMITMENT AND PERSONAL INFORMATION

We collect, use, and disclose personal information to operate our business and as required by law. Personal information is information about an identifiable individual, or any information that identifies you as an individual, as defined in the *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c.5 ("PIPEDA") and in any applicable state legislation as amended from time to time. It includes information that you provide to Rugby or that Rugby collects from any third party.

2. CHANGES TO PRIVACY POLICY

This Policy describes our current privacy practices. We update this Policy on an ongoing basis to ensure consumers, customers and service providers, are aware of updates to our privacy practices, to streamline those practices and to comply with applicable laws. Please visit the Websites regularly for updates.

Rugby may, at any time and from time to time at its sole discretion, update, revise, supplement, replace, and/or otherwise modify this Policy and/or impose new or additional rules, policies, terms, or conditions on You. Such updates, revisions, supplements, replacements, modifications, and additional rules, policies,

terms, and conditions (collectively referred to as "**Revised Terms**") will be effective immediately upon the Revised Terms being posted to a Website or by Rugby otherwise making them available to You (as the case may be). Any continued use of a website following such posting of the Revised Terms to this Policy or by Rugby otherwise making them available to You (as the case may be), will be deemed to constitute acceptance of and consent to the Revised Terms.

3. INFORMATION WE COLLECT, AND LIMITING COLLECTION

Except where information is required to fulfill an identified purpose, you get to decide what information you want to share with us.

Through the Websites, Rugby collects information about identifiable individuals ("**Personal Information**") relating to use of the Websites and any related services by users, which may include but may not be limited to the following information:

- a) contact and biographical information that you provide to us, including your first and last name, your email address, your phone number, and your address, in connection with creating and maintaining an account registered with Rugby or otherwise in connection with your use of features of the Websites and any related services;
- b) information you provide directly to us when you request that we conduct a specific task on your behalf using the Websites, or other information you provide when you communicate with us.
- c) usage information, including the information created from your use of the Websites and related services, including automatically collected online identifiers such as general geographic location, IP address, and details regarding your use of the Websites.
- d) information that you provide to us for the purpose of obtaining or receiving updates about new services, and/or obtaining or receiving notifications; and
- e) information about your online activity; for example, information about your web browser, Internet Protocol (IP) address, use of the Websites, and history. Cookies (small computer files that a website's server places on your computer) collect information about your online behavior. You can set your browser to reject cookies, but this may impair our ability to customize and test your experience, like remembering your preferred language or present location-specific information to you. By using and browsing a website, you consent to cookies being used in accordance with this Privacy Policy. If you do not consent, you must disable cookies or refrain from using the Websites. Cookies do not typically contain Personal Information, but Personal Information that we store about you may be linked to the information stored in and obtained from cookies.

With respect to the Personal Information of any third parties that you may provide to Rugby in connection with your use of the Websites, you are responsible for ensuring that you have any such third party's consent to the collection, use, and disclosure of their Personal Information in accordance with the terms of this Privacy Policy, and by providing such Personal Information to Rugby, you represent and warrant that you have such consent.

4. IDENTIFYING PURPOSES AND USE OF PERSONAL INFORMATION

We will clearly identify the purposes for which Personal Information is collected, used or disclosed prior to, or at the time of, collection. Personal Information submitted to us, whether through the Websites or otherwise, may be used by us for the purposes specified in this Privacy Policy or as specified in connection with Website and/or any related services, and you hereby consent to same. By registering to create an account with Rugby or otherwise using the Websites, you consent to the use of your Personal Information as indicated in this Privacy Policy.

Rugby may use your Personal Information to (and you hereby consent to each of the following uses):

- a) set up an account with us or otherwise register you to use the Websites and any related services.
- b) provide, update, maintain, administer and operate the Websites and deliver and enable your use of the Websites, including the development of new product and service offerings.
- c) understand how you and our other users use the Websites in order to improve the Websites and our marketing efforts, and to assess trends in use of the Websites, and other services and products offered by Rugby.
- d) inform you of other products, promotions or services available from Rugby and its partners and affiliates.
- e) confirm your identity.
- f) deal with inquiries, complaints, submissions and feedback relating to the Websites, and to investigate and settle any dispute or claim which relates to the Websites; and
- g) manage, administer, maintain, service, and enforce our Privacy Policy and verify compliance with agreements between you and us relating to your use of the Websites, or to otherwise comply with applicable laws and regulations.

Rugby may also anonymize, aggregate or otherwise strip any Personal Information we collect of all personally identifying characteristics.

We may use your Personal Information to contact you. Your Personal Information allows us to contact you by various methods, including mail, email, and telephone at the contact points you have provided to us. We will contact you to respond to your questions, provide you with information about our products, inform you about the Website and any related services and to update you on changes to our websites. When you communicate online or by email, you should be aware that sending information over the internet is inherently insecure, as it can be intercepted or manipulated and retransmitted.

5. DISCLOSURE OF PERSONAL INFORMATION

Any Personal Information provided by you, or that is derived automatically by or through the Websites, is not sold, rented, or shared by us with any third party without your consent, except in the circumstances described in this Privacy Policy. We may disclose your Personal Information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors, to the extent that such disclosure is reasonably necessary for the purposes set out in this Privacy Policy.

You acknowledge and agree that We may use and/or disclose your Personal Information, without notice, if legally permitted to do so according to the relevant provisions of PIPEDA and PIPA, and/or any other relevant privacy enactment (collectively, the "**Privacy Acts**"). The Privacy Acts may permit the use and/or disclosure of Personal Information without notice if, for example: (a) the Personal Information could be useful in the investigation of a contravention of the laws of Canada, a province or a foreign jurisdiction; (b) the Personal Information is used or disclosed for the purpose of acting in respect of an emergency that threatens the life, health or security of an individual; and (c) the Personal Information is disclosed to comply with the edicts of the law, or to comply with a subpoena or warrant issued or an order made by a court. In any event, Rugby may release Personal Information when it believes in good faith that such release is necessary to: (i) comply with any law, order, rule, or regulation; (ii) enforce or apply this Privacy Policy or any other contract or policy of Rugby; and (iii) protect the rights (including intellectual property rights), property, or safety of Rugby, its shareholders, directors, employees, contractors, or others.

We may disclose your Personal Information if Rugby or substantially all its assets are acquired by a third party, in which case Personal Information held by it about its customers will be one of the transferred assets, in accordance with applicable law.

You also acknowledge and agree that we may engage other companies and individuals ("**Third Party Service Providers**") to perform some of the foregoing on our behalf. We may disclose your Personal Information to one or more Third Party Service Providers who provide services for us or perform Services on our behalf. We make commercially reasonable efforts to ensure any company with which we may share Personal Information protects that Personal Information and data in a manner similar to this Privacy Policy and limits the use of such Personal Information to the performance of the services being provided to Rugby.

We may disclose your Personal Information to other Third-Party Service Providers, namely Third-Party Service Providers who:

- host and administer our websites, process and store data, and fulfill similar technology-related functions on our behalf or carry out any other purpose described in this Privacy Policy;
- provide us with other computing and IT services and may access and use your Personal Information while performing their services; and/or
- provide analytics services to help us understand how our websites are used.

We make commercially reasonable efforts to ensure that all Third-Party Service Providers acting on our behalf are obligated to provide a comparable level of protection for your Personal Information to the level of protection that we provide.

6. CONSENT

If you apply for registration of an account on the Websites or otherwise provide Personal Information through the Websites or provide your Personal Information to us in any other way, you acknowledge your consent to the collection, use and disclosure of your Personal Information as set out in this Policy and applicable laws. If we want to use your Personal Information for a purpose that was not disclosed at the time of initial consent, consent will be sought at the time of this new purpose.

Withdrawal of consent. You may withdraw your consent to the collection, use, and disclosure of your Personal Information as set out in this Privacy Policy at any time. Withdrawal of your consent to the collection, use, and/or disclosure of your Personal Information as set out in this Privacy Policy may result in all or part of the Websites and/or related services being unavailable to you. If you withdraw your consent to the collection, use, and/or disclosure of your Personal Information as set out in this Privacy Policy, Rugby reserves the right to limit your access or prevent you from accessing the Websites and/or any related services.

Updating consent. Subject to legal and contractual restrictions, you can, with reasonable notice to us, update your consent or withdraw your consent to the collection, use, and disclosure of your Personal Information for specific purposes, other than the collection, use, and disclosure which is required for us to maintain your account with us and to provide services that you sign up for and for which you were approved.

7. ACCURACY

We take steps to ensure that your Personal Information is as accurate, complete and up to date as is necessary for the purposes for which it is to be used. If you believe that the Personal Information, we have about you is not accurate or is incomplete, please contact us by email at info@adentragroup.com.

8. SAFEGUARDS

We use a variety of procedures and practices appropriate to the sensitivity of Personal Information to protect against loss, theft and unauthorized access. Access to your Personal Information is restricted to those individuals and parties who require access for the purposes set out in this Policy. For example, Rugby may secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When Personal Information is transmitted to other websites or third parties for the purposes specified above, we may also, or in the alternative, protect it through the use of encryption, such as by way of the Secure Socket Layer (SSL) protocol.

Personal Information may be accessed by persons within our organization, or our Third Party Service Providers, who require such access to carry out the purposes described in this Privacy Policy or otherwise permitted or required by applicable law.

Even though we have taken steps to help protect the Personal Information in our control, you should know that we cannot fully eliminate security risks associated with Personal Information. No security measures can provide absolute protection. We cannot ensure or warrant the security of any Personal Information you provide to us. While we take all reasonable measures to protect data, there is always inherent risk when providing Personal Information. The transmission of Personal Information and data over the Internet is inherently insecure, and there are no security systems that are completely safe or fool-proof against hacking or tampering.

You are solely responsible for controlling access to your account(s) associated with the Websites and maintaining the confidentiality and security of your accounts and related password information. You are entirely responsible for all activities that occur on or through your account(s), and Rugby shall not be responsible for any losses arising out of the unauthorized use of any of your account(s) associated with the Websites.

9. STORAGE

We may store your Personal Information in any jurisdiction where we operate, including in Canada. When we share your Personal Information with our Third-Party Service Providers, they may store some of your Personal Information in their databases in Canada, the United States, or elsewhere in the world. If you are downloading, installing, or using our websites from jurisdictions outside Canada, please be advised that by transmitting or sending Personal Information to us, you are transferring your Personal Information to us in Canada, where data protection and privacy laws may be less stringent than the laws of your country.

10. RETENTION

We will retain your Personal Information for as long as needed to provide you with services through our websites, for our valid business purposes, and as necessary to comply with our legal obligations, resolve

disputes, defend our legal rights, and enforce our agreements. You can request that we delete Personal Information about you in our possession. If you would like us to delete some or all of your Personal Information, or delete your account (if applicable), please contact us by email at info@adentrargroup.com.

11. RIGHTS REGARDING PERSONAL INFORMATION

Different laws allow you to exercise rights relating to your Personal Information in our possession. Depending on where you are located, these rights can vary. Your rights usually include the right to:

- access copies of the Personal Information that we collect, use and disclose about you, as long as such data remain available in our databases; and
- ask for the deletion of your Personal Information in certain circumstances provided by applicable law.

Depending on where you are located and subject to applicable law, you may have additional rights with respect to your Personal Information in our possession, including:

- “Right to rectification” – the right to ask for the rectification of your Personal Information in case it is incorrect, incomplete, invalid or ambiguous;
- “Right to be forgotten” - the right to request that we erase your Personal Information in certain circumstances provided by applicable law;
- “Data portability” - the right to request that we send to another company, where technically feasible, your Personal Information;
- The right to request that we restrict the processing of your Personal Information in certain circumstances; for example, if you contest the accuracy of the Personal Information while we are verifying the accuracy thereof; and
- The right to object to processing of your Personal Information where it is processed on the grounds of legitimate business interests.

If you have any questions about your rights or if you want to exercise any of these rights, please contact us by email at info@adentrargroup.com. We will take reasonable steps to enable you to access your Personal Information, or to update or correct Personal Information in our possession that you have previously submitted.

If you request a transcription, reproduction, or transmission of your Personal Information, we may have to charge a reasonable fee to process your request, subject to applicable laws. In this case, we will contact you about these charges before addressing your request.

Additionally, in some cases, your ability to access or control your Personal Information will be limited, as required or permitted under the applicable laws. If your request is denied, we will notify you in writing, with the reasons for our refusal and information on how to appeal our decision.

12. NEVADA, CALIFORNIA, VIRGINIA RESIDENTS

Nevada, California and Virginia residents have the right to submit a verified request directing us not to sell your Personal Information. To submit such a request, please contact us by email at info@adentragroup.com.

13. THIRD PARTY POLICIES AND LINKS

The Websites may contain links to other third-party sites that are not governed by this Privacy Policy. Our Privacy Policy will no longer apply once you leave our Websites. Additionally, we are not responsible for the privacy practices employed by third-party websites. Therefore, we suggest you examine those sites' privacy statements to learn how your information may be collected, used, shared and disclosed. Rugby does not endorse, approve of, verify, attest to, or offer any representation or warranty with Rugby as to, the accuracy of the content of such websites that are linked or Internet resources that are linked from the Websites. If you decide to leave the Websites and access these third-party sites, you do so at your own risk.

Any links from our Websites to other websites, or references to products, services or publications other than those of Rugby, do not imply the endorsement or approval of such websites, products, services or publications by Rugby.

14. COOKIES

A cookie is a small computer file or piece of information that may be stored on your computer's hard drive when you visit our Websites. We may use cookies to improve our Websites' functionality and, in some cases, provide visitors with a customized online experience.

Cookies are widely used, and most web browsers are configured initially to accept cookies automatically. You may change your Internet browser settings to prevent your computer from accepting cookies or to notify you when you receive a cookie so that you may decline its acceptance. Please note, however, that if you disable cookies, you may not experience the optimal performance of the Websites.

If you do not wish to receive cookies, or want to be notified of when they are placed, you may set your web browser to do so, if your browser so permits. If you wish to delete cookies, you may set your web browser to do so, if your browser so permits. You acknowledge and agree that if cookies are turned off or deleted, you may not be able to view certain parts of the Websites or use certain services available through the Websites or certain features or functionalities thereof.

15. OPENNESS, INDIVIDUAL ACCESS AND CHALLENGING COMPLIANCE

You can write to Rugby to request access to the Personal Information we have on file for you. We will provide you with the Personal Information we have, subject to certain considerations specified by law. If you wish to request access to the Personal Information that we have on file for you, or request that such Personal Information be corrected, please contact Rugby' designated Privacy Officer at info@adentrargroup.com.

Rugby welcomes your comments regarding this Privacy Policy. If you would like more information on this Privacy Policy or Rugby' organizational privacy policies, or if you believe that Rugby has not adhered to the terms of this Privacy Policy, please contact Rugby' designated Privacy Officer at info@adentrargroup.com. We will use commercially reasonable efforts to promptly identify and remedy any failure by Rugby to adhere to the terms of this Privacy Policy.

[End of Rugby Privacy Policy]