



U2 Fasteners – Privacy Program & Handbook (Canada + U.S., Law 25 Aligned)

Effective date: ???

Owner / Privacy Officer: Swen Ruhmann (CEO)

Applies to: All U2 Fasteners staff, contractors, and independent sales reps who handle personal information.

1) Purpose

U2 Fasteners ("U2") respects privacy and is committed to protecting personal information handled in the course of business. This handbook sets out U2's privacy governance, rules, and procedures so we comply with: (a) Quebec's Act respecting the protection of personal information in the private sector, as modernized by Law 25, for information about individuals located in Quebec; (b) Canada's federal Personal Information Protection and Electronic Documents Act (PIPEDA) and substantially similar provincial private-sector laws for the rest of Canada; and (c) applicable U.S. federal and state privacy/marketing laws when we handle personal information of U.S. individuals. U2 is headquartered in Ontario and carries on business across Canada, including Quebec, and in the United States.

2) Privacy Officer

Under Law 25 and PIPEDA, U2 must have a person in charge of personal information. At U2, the Privacy Officer is the CEO.

Privacy Officer: Swen Ruhmann (CEO)

Email: privacy@u2fasteners.com

Phone: 1-855-895-7096

Mail: INFO@U2FASTENERS.COM

Responsibilities include approving privacy policies and procedures, ensuring compliance and training, approving privacy impact assessments, overseeing breach response and incident logging, and responding to privacy rights requests.

3) Scope and Definitions

3.1 Personal information (PI) means information about an identifiable individual. At U2, PI commonly includes names, direct work emails, direct work phone numbers, shipping addresses for sample requests, and role-related notes of people we do business with, even in a B2B context.

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3.2 Sensitive PI is information that could cause serious harm if misused or disclosed. At U2 this may include banking details, tax identifiers, or credit-card data during payment processing.

3.3 A confidentiality incident (breach) is any loss of PI or unauthorized access, use, or disclosure, including mis-sent emails, lost devices, paper file loss, or cyber incidents.

4) What U2 Collects (Data Inventory)

U2 collects only PI required for legitimate business purposes:

4.1 Business customers / suppliers (B2B contacts)

- Name, job title, company name
- Business email, business phone
- Business address / shipping location
- Ordering, quoting, service and support history
- Relationship notes relevant to business operations
- For U.S. business customers, Federal Business ID / EIN (or equivalent tax identifier) when required for U.S. Homeland Security / customs compliance for shipping.
- For third-party small-parcel shipping (e.g., UPS, FedEx), a business contact phone number and email address when required by the carrier for shipment processing, delivery, and tracking notifications.

4.2 Trade shows / social media / sample requests (individual contacts)

- Name and contact details provided by the individual
- Shipping address for sending requested samples
- Context of the request (show visited, message thread, product requested)

This information is used only to fulfill the request and manage follow-up related to that request.

4.3 Independent sales representatives

- Name and business contact details
- Territory / region assignment
- Sales activity and commission records
- Banking details for payment
- Tax identifiers only when legally required for reporting

4.4 Payment information (credit cards)

U2 may process credit-card transactions for certain customers. Credit-card numbers or security codes are not retained after payment is authorized. Any temporary records are securely destroyed immediately after successful processing.

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4.5 Retail locator listings

U2 may display a retailer locator on its website. Listings default to retailer business information only (store name, address, main store phone, store website, and generic store email). Publishing any information that identifies an individual (e.g., a named contact person, direct email/phone, or photo) requires documented explicit consent from that individual.

Retail locator listing files and updates are stored in U2's Google Drive environment. Access is limited to authorized staff on a need-to-know basis, and any exports/downloads must follow this handbook's safeguard and retention rules.

4.6

We do not intentionally collect health data, biometrics, demographic data, home addresses, or unrelated personal details unless legally required for a specific purpose.

5) Purposes for Collection and Use

U2 uses PI only for clear, specific business purposes:

- Account setup and customer/supplier management
- Order processing, delivery, returns, warranties
- Providing quotes, product support, and logistics coordination
- Business communications
- Sending requested product samples and related follow-up
- Administering rep agreements and paying commissions
- Meeting legal, tax, and audit obligations
- Improving operations and service quality
- Meeting carrier, customs, border-security, and U.S. Homeland Security requirements for shipping to or within the United States.
- Sending product/news/promotional updates to customers and business contacts where lawful consent exists.

PI is not used for unrelated secondary purposes without appropriate consent.

6) Consent Rules

Consent must be meaningful and tied to specific purposes. In most B2B situations, consent is implied by the relationship (e.g., placing orders, requesting quotes). For trade-show or social-media sample requests, consent is implied by the individual's request and provision of shipping/contact details for that purpose. If U2 uses PI for a new purpose, we will obtain fresh consent unless a legal exception applies. Sensitive PI (banking, tax identifiers, or any similar data) requires explicit consent where applicable.

Where shipping law or carrier rules require extra identifiers (e.g., EIN/Federal Business ID, phone, email), collection is considered necessary to provide the requested delivery service.

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6.1 Promotional email blasts (marketing communications)

U2 may send promotional or informational email blasts to customers and business contacts about products, services, programs, or company updates. In Canada, such messages are commercial electronic messages (CEMs) under CASL and may be sent only where U2 has express consent or valid implied consent (e.g., an existing business relationship such as a purchase or quote within the CASL time window). Every promotional email must clearly identify U2 as the sender (including contact information and mailing address), use truthful subject lines and content, and include a working, no-cost unsubscribe mechanism that is honored promptly. U2 maintains records of marketing consent (express or implied) and unsubscribe status. Individuals who unsubscribe will be removed from future blasts except where messages are strictly transactional or required by law.

7) Storage, Access, and Transfers

7.1 In-house systems

U2 stores and processes PI on in-house systems located in Ontario. Retail locator business-listing files are an operational exception and are maintained in U2's Google Drive environment for website updates. Aside from that exception, U2 does not use cloud vendors or external processing providers.

7.2 Transfers outside Quebec

Storing/processing PI about Quebec residents on Ontario in-house systems is a communication outside Quebec under Law 25. U2 maintains a documented PIA confirming adequate protection.

7.3 Access controls and safeguards

- Role-based access ("need-to-know")
- Unique user accounts; no shared logins
- Strong password standards and MFA where feasible
- Encrypted backups
- Physical security for servers and offices
- Monitoring/logging of system access
- Secure disposal of paper/electronic records
- Staff confidentiality commitments and training

8) Data Minimization and Accuracy

U2 collects the minimum PI necessary for stated purposes and keeps PI accurate and up to date. Employees must not record irrelevant personal details in notes fields or keep side spreadsheets of contacts unless authorized and controlled. Corrections requested by individuals will be made promptly where appropriate.

9) Retention and Secure Destruction

U2 keeps PI only as long as necessary for business purposes or as required by law.

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Typical retention:

- Customer/supplier account and order records: retained to satisfy warranty, accounting, and legal requirements.
- Sample-request records: retained only as long as needed to fulfill and follow up on the request.
- Commission/payment & tax records: retained for legally required tax/audit periods.
- Credit-card data: not retained after authorization.
- Retail locator contact consents (if any): retained while listing is active and for audit purposes after removal.

Secure destruction methods include shredding paper files and permanently deleting electronic records from production systems and backups when feasible.

10) Confidentiality Incidents (Breach Response)

10.1 Immediate actions (all staff)

- 1) Stop and contain the incident (e.g., recall an email, secure files, disconnect a device).
- 2) Report within 24 hours to the Privacy Officer at privacy@u2fasteners.com.
- 3) Do not attempt to hide or resolve alone.

10.2 Privacy Officer actions

The Privacy Officer will assess risk, mitigate harm, determine whether notification is required to affected individuals and/or regulators (Commission d'accès à l'information in Quebec; Office of the Privacy Commissioner of Canada; and relevant U.S. authorities where applicable), and record every incident in the Incident Register.

10.3 Incident Register

U2 maintains an internal log of all confidentiality incidents, including minor ones.

11) Individual Rights Requests

Individuals may request access to and correction of their PI, withdraw consent where applicable, and Quebec residents may request data portability for computerized PI. Requests must be sent to privacy@u2fasteners.com. The Privacy Officer verifies identity and responds within legal timelines.

12) Employee & Rep Responsibilities

All staff and reps who handle PI must:

- Follow this handbook and any related procedures.
- Access PI only for assigned duties.
- Keep PI confidential in and out of the workplace.
- Use only approved systems for PI.

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- Report incidents promptly.
- Complete privacy training as assigned.

Prohibited actions include exporting PI to personal devices, emailing PI to non-U2 accounts, sharing PI with unauthorized people, or leaving PI unsecured.

13) Training & Annual Review

New staff receive privacy onboarding. Annual refresher training is provided. The Privacy Officer reviews and updates this program at least once per year or after a major incident or business change.

14) Disciplinary Measures

Violations of this handbook may result in removal of system access, formal discipline up to termination of employment or contract, and legal action where appropriate.

15) Contact & Escalation

Privacy Officer: Swen Ruhmann

Email: privacy@u2fasteners.com

Phone: 1-855-895-7096

Quebec residents who remain unsatisfied may contact the Commission d'accès à l'information (CAI). Other Canadian residents may contact the Office of the Privacy Commissioner of Canada (OPC).

16) U.S. Addendum (Applicability and Key Rules)

U2 handles PI of individuals located in the United States (e.g., tradeshow contacts, sample requests, or U.S. purchasing contacts). The U.S. has no single national privacy law; compliance is based on federal sector rules plus state consumer-privacy laws.

16.1 State comprehensive privacy laws

States such as California (CCPA/CPRA), Virginia, Colorado, Connecticut, Utah and others regulate consumer PI when company size/volume thresholds are met. U2 does not currently believe it meets those thresholds, but we follow equivalent protections as a baseline.

Threshold summary (one paragraph): In practice, most U.S. state privacy laws apply only to larger companies that meet specific scale triggers. California covers businesses that (a) have about \$26.6M+ in annual gross revenue (2025 inflation-adjusted), or (b) buy/sell/share PI of 100,000+ consumers/households, or (c) earn 50%+ of revenue from selling/sharing PI. Colorado and Virginia generally apply when a company controls/processes PI of 100,000+ state consumers per year, or 25,000+ consumers plus meaningful revenue from selling PI. Connecticut has passed SB 1295 amendments that broaden scope and modify applicability

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starting 2026, potentially lowering some thresholds and tightening rules, so coverage will be easier to trigger over time.

16.2 Rights we support where applicable

Where required, U2 will honor rights to access, correct, delete, port, and opt out of any PI sales/sharing or targeted advertising. U2 does not sell PI.

16.3 Marketing (CAN-SPAM / TCPA)

Promotional emails to U.S. recipients comply with the CAN-SPAM Act. Emails must include accurate header/from information, non-misleading subject lines, U2's physical mailing address, and a clear unsubscribe method that is processed within required timelines. U2 does not send marketing texts/calls without appropriate prior express consent and respects opt-out and Do-Not-Call requests.

16.4 FTC Act

U2 does not make misleading statements about privacy or security and maintains reasonable safeguards to protect PI.

Appendix A — External Privacy Notice (English)

U2 Fasteners collects personal information primarily related to business contacts at our wholesalers, retailers, suppliers, and independent sales representatives. We also collect limited personal information from individuals who request product samples at trade shows or through social media. We use this information to manage accounts, process orders, provide support, send requested samples, administer sales representation agreements, pay commissions, and meet legal obligations.

Our website may display a retailer locator containing store business information. We do not publish personal contact details of individuals unless we have their consent.

Where you have provided consent (express or implied), we may send you promotional emails, and you can unsubscribe at any time.

Personal information about Quebec residents is stored and processed on U2's in-house systems located in Ontario. U2 evaluates privacy risks related to this communication outside Quebec and applies safeguards to ensure adequate protection.

Individuals may access or correct their personal information, withdraw consent where applicable, and Quebec residents may request data portability for computerized information. To exercise these rights or ask questions, contact our Privacy Officer at privacy@u2fasteners.com.

Appendix A — Avis de confidentialité (Français)

U2 Fasteners recueille des renseignements personnels principalement liés aux contacts d'affaires de nos grossistes, détaillants, fournisseurs et représentants commerciaux indépendants. Nous recueillons également des renseignements personnels limités auprès *U2 fasteners™ – 100 Main Street, Keefer Terminal, Suite 500. Thunder Bay, Ontario, CANADA*

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de personnes qui demandent des échantillons de produits lors de salons professionnels ou par l'entremise des médias sociaux. Nous utilisons ces renseignements pour gérer les comptes, traiter les commandes, offrir du soutien, envoyer les échantillons demandés, administrer les ententes de représentation commerciale, payer les commissions et respecter nos obligations légales.

Notre site Web peut afficher un localisateur de détaillants contenant des renseignements d'affaires sur les magasins. Nous ne publions pas les coordonnées personnelles d'une personne identifiée à moins d'avoir obtenu son consentement.

Lorsque vous avez donné un consentement (exprès ou implicite), nous pouvons vous envoyer des courriels promotionnels; vous pouvez vous désabonner en tout temps.

Les renseignements personnels concernant des résidents du Québec sont conservés et traités sur les systèmes internes de U2 situés en Ontario. U2 évalue les risques liés à cette communication à l'extérieur du Québec et applique des mesures de protection afin d'assurer une protection adéquate.

Les personnes peuvent demander l'accès à leurs renseignements personnels, les faire corriger, retirer leur consentement lorsque applicable, et les résidents du Québec peuvent demander la portabilité des renseignements personnels informatisés. Pour exercer ces droits ou pour toute question, veuillez communiquer avec notre responsable de la protection des renseignements personnels à privacy@u2fasteners.com.

Appendix B — Quick PIA Record (Quebec → Ontario in-house processing)

System/Process: In-house ERP/CRM/Accounting used for Quebec customer contacts, sample requests, and rep commissions

PI involved: Named B2B contacts; sample-request shipping details; rep payment/commission data

Transfer: From Quebec individuals to Ontario in-house systems (outside Quebec)

Assessment summary:

- Purposes are specific and legitimate.
- Collection is minimal.
- Access is role-based and logged.
- Data is stored securely with physical and technical safeguards.
- Retention/destruction rules exist.

Decision: Adequate protection confirmed; transfer permitted.

Approved by: Swen Ruhmann, Privacy Officer

Date: December 8, 2025

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Appendix C — U.S. Privacy Notice (short form)

If you are located in the United States, U2 Fasteners collects limited personal information you provide, such as name, contact details, and shipping address, primarily to fulfill business requests and send requested product samples. We do not sell your personal information or use it for targeted advertising. Where U.S. state privacy laws apply, you may request access, correction, deletion, or portability of your personal information, and may opt out of any data sales/sharing. To exercise your rights, contact privacy@u2fasteners.com.

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