



KAMSEL LEASING INC. PRIVACY POLICY

The collection and use of personal information is an essential component of our operations, in order to provide products and services that meet our customers' needs. At Kamsel Leasing Inc., we are committed to protecting and maintaining the privacy of the information collected, used or disclosed. Therefore, we have adopted this privacy policy.

The privacy policy explains how we collect, use, disclose and safeguard the personal information provided to us either directly by you or by a third party.

By providing personal information to us, or authorizing a third party to provide your personal information to us, you signify your consent to our collection, use and disclosure of your personal information in accordance with this privacy policy.

For purposes of this privacy policy, "personal information" shall mean any information that can identify an individual directly or through other reasonably available means. Personal information will not include an individual's business address or business telephone number.

As part of our commitment to treat your personal information with respect, we operate in accordance with the following ten principles:

Principle 1 - Accountability

Principle 2 – Identifying Purposes

Principle 3 - Consent

Principle 4 – Limiting Collection

Principle 5 – Limiting Use, Disclosure and Retention

Principle 6 - Accuracy

Principle 7 – Safeguarding Customer Information

Principle 8 - Openness

Principle 9 – Individual Access

Principle 10 – Handling Customer Complaints and Suggestions

Principle 1 – Accountability

We are responsible for personal information under our control and have designated the Corporate Controller as the Privacy Officer who is accountable for our compliance with the principles.

Principle 2 – Identifying Purposes

We will identify the purposes for which personal information is collected before we collect the information.

Principle 3 – Consent

Except where required or permitted by law, your informed consent is required for our collection, use or disclosure of your personal information.

Principle 4 – Limiting Collection

We will limit the collection of personal information to that which is necessary for the purposes we identify.

Principle 5 – Limiting Use, Disclosure and Retention

We will only use or disclose your personal information in accordance with the purposes for which it was collected, except with the consent of the individual or as required or permitted by law. We will retain personal information only as long as is required to fulfill the purpose for which it was collected or as required by law.

Principle 6 – Accuracy

We make every reasonable effort to ensure that personal information is maintained in an accurate, complete and up-to-date form. We rely on the individual to keep certain personal information, such as address information, accurate, complete and up-to-date.

Principle 7 – Safeguarding Customer Information

Security safeguards appropriate to the sensitivity of the information are used to protect personal information.

Principle 8 – Openness

Copies of this privacy policy will be made available and questions pertaining to the policy will be addressed within a reasonable length of time.

Principle 9 – Individual Access

Upon request, or within a reasonable length of time, we shall inform you of the type of personal information we have collected, how we have used your personal information in the past, and how we may in the future, and whether or not we have disclosed your personal information to any third parties. Individuals may verify the accuracy and completeness of the information and may request that it be amended as appropriate.

In order to respond to the request for information or to correct the information, we may require additional details to verify your identity.

Principle 10 – Handling Customer Complaints and Suggestions

Individuals may question or enquire of our compliance with respect to the principles by contacting us by email or by writing to the following address:

Privacy Officer
Kamsel Leasing Inc.
1720 Howard Avenue, Suite #468
Windsor, Ontario
N8X 5A6

Phone: (519) 258-2525
Fax: (519) 258-7390
privacy@kamsel.com

Why We Gather Personal Information

At Kamsel Leasing Inc., we gather and use personal information for credit assessment, statistics, collection of accounts receivable, confirmation of insurance coverage, ensuring Kamsel Leasing Inc. is designated as loss payee on the policy and reporting to various credit reporting agencies such as credit bureaus.

We also use the personal information you have provided to us to communicate with you. This might include important notices, and responding to special needs or enquiries you may have. We may also provide information about other products and services we believe may be of benefit to you.

We only use personal information for the purposes that we have disclosed to you. If for any reason your information is required to fulfill a different purpose, we will obtain your consent before we proceed.

Types of Information We Collect

The type of personal information we ask for depends on and is related to the reason (or purpose) such personal information was provided to us. The following is a description of the type of personal information that we may ask for:

- Name and address
- Date of birth
- Social insurance number
- Contact information such as telephone and fax numbers, email address
- Bank information including bank name, transit and account number
- Employment information
- Annual income
- Personal references
- Credit history

Provision of your social insurance number is entirely optional. However, you should be aware that most credit reporting agencies use this number as a unique identifier to ensure proper identification when conducting credit reviews and preparing credit reports. If you do not wish to provide this number, our ability to obtain a timely and accurate report may be affected.

The choice to provide us with your personal information, either directly or through a third party, is yours. However, your decision to withhold particular information may result in limiting our ability to provide you with the services or products requested.

How We Collect Such Personal Information

Personal information may be collected from you in person, by telephone, by mail correspondence, by facsimile, via the Internet or from third parties who have your authority to disclose such personal information to us.

We try to ensure that every third party who discloses personal information to us has your consent to do so, but if you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party. If they do not adequately respond to your inquiries, please contact us.

Website Visits

When you visit websites, web servers automatically collect anonymous/non-personal information regarding your website visit. Anonymous/non-personal information is information that cannot be associated with or traced back to a specific individual or business entity. The anonymous/non-personal information collected may be used for research or analytical purposes.

When you visit our website at www.kamsel.com, we do not collect information that could identify you personally unless you choose to provide it voluntarily. You may browse the website at any time anonymously without revealing any personal or financial information about yourself. However, should you choose to submit information on any of our forms, we cannot be held liable should this information be intercepted or otherwise illegally acquired by a third party. These forms are not within a secured environment, and therefore, the personal or company information that is transmitted is not encrypted with 128-bit cipher strength.

Our website may contain links to other third party sites that are not governed by this privacy policy. Although we endeavour to only link to sites with high privacy standards, our privacy policy will no longer apply once you leave our website. Additionally, we are not responsible for the privacy practices employed by other third party websites. Therefore, we recommend that you examine the privacy statements of those sites to learn how your information may be collected, used, shared and disclosed.

When Information May Be Disclosed to Outside Parties

Except as specifically provided for in this privacy policy, we do not disclose any personal information to third parties. The following are the limited instances where we may disclose your personal information to third parties:

- To investigate potentially fraudulent or questionable activities regarding the use of our services;
- To offer you related products and services that might benefit you;
- To verify delivery and acceptance of product or services;

- To provide information to our funding partners;
- In anticipation of and in the course of an actual or potential sale of our business or assets, or possible reorganizations, consolidations, mergers or amalgamations; and
- When required or permitted by law.
- To pursue collection of accounts owed to us by you.

The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements. In some instances such as legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested will be disclosed and we will take precautions to satisfy ourselves that the authorities that are making the request have legitimate grounds to do so.

There are some situations where we are legally permitted to disclose personal information such as employing reasonable and legal methods to enforce our rights or to investigate suspicion of illegal activities.

Our Employees and Your Personal Information

In the course of our daily operations, access to private, sensitive and confidential information is restricted to authorized employees who have a legitimate business purpose and reason for accessing it. For example, when you call us, our employees will access your information to verify who you are and to assist you in fulfilling your request.

As a condition of their employment, all employees are required to abide by the privacy standards we have established. Employees are informed about the importance of privacy. All employees are expected to maintain the confidentiality of personal information at all times and failing to do so will result in appropriate disciplinary measures.

How We Safeguard Your Information

We use industry standard technologies and maintain current security standards to ensure that your personal information is protected against unauthorized access, disclosure, inappropriate alteration or misuse. Access is restricted.

When you call our office for assistance, your identity will be verified through your provision of personally identifying information as well as your contact number.

Accessing and Amending Your Information

Decisions are often made based on the information we have and therefore, it is important that your personal and financial information is accurate and complete. As a customer, you have the right to access, verify and amend the information held in your file.

We encourage you to amend inaccuracies and make corrections as necessary. Despite our efforts, errors may occur. Should you identify any incorrect or out-of date

information in your file, we will make the proper changes. Where appropriate, we will communicate these changes to other parties who may have unintentionally received incorrect information from us.

You may access and verify your information by sending your request in writing.

Questions, Concerns and Complaints

If you have a question about the privacy policy, please contact us at (519) 258-2525 during normal business hours.

If you have a concern or complaint about privacy, confidentiality or the information handling practices of your account, please write to us:

Privacy Officer
Kamsel Leasing Inc.
1720 Howard Avenue, Suite #468
Windsor, Ontario
N8X 5A6
Phone: (519) 258-2525
Fax: (519) 258-7390
privacy@kamsel.com

Before we are able to provide you with any information or correct any inaccuracies, however, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will endeavour to respond within an appropriate timeframe.

Updating This Privacy Policy

Any changes to our privacy policy and information handling practices will be acknowledged in this policy in a timely manner. We may add, modify or remove portions of this policy when we feel it is appropriate to do so. You may determine when this policy was last updated by referring to the revision date at the bottom of this privacy policy.

Revised April 2004

Adopted April 2004