



EVEREADY INDUSTRIAL GROUP LTD.

POLICY

Date: January 1, 2004

Subject: “Personal Information Privacy Protection”

At EVEREADY, protecting the privacy and confidentiality of personal information in respect of our employees, sub-contractors (collectively our “employees”), and our customers is important to the way we wish to operate our business.

To comply with the multitude of legislative requirements that influence the way we manage our business we may be required to collect, maintain, use and disclose personal information for reasonable purposes on a routine basis.

To offer a better understanding in reference to how personal information is protected here at EVEREADY, we provide the following statement describing our practices and policies with respect to the privacy of employee information. In the event of employment discontinuation, we will continue to adhere to the policies and practices described in this notice.

Information We Collect

- ***Employee Information***

As a company, we collect, retain, use and disclose personal information about individual employees, as allowed by law, to manage our business. EVEREADY is committed to limiting the consent, use and disclosure of employee personal information for the purpose of administering and facilitating the employment relationship. Specifically, we collect and use information for identification purposes, for income tax purposes, for purposes relating to remuneration and employment benefits, to meet employment and other legislative and regulatory requirements, for insurance purposes, and to meet WCB requirements. Other purposes include the evaluation and assessment of employee performance, and the facilitation of contact with employees outside of the workplace. EVEREADY reserves the right to collect, use and disclose employee personal information for other reasonable purposes, provided that EVEREADY notifies its employees in advance of such new/other purposes.



EVEREADY INDUSTRIAL GROUP LTD. “Personal Information Privacy Protection” POLICY continued

We collect personal information from such sources as:

- Applications for Employment & Resumes;
- Documentation provided by employees post-hiring;
- Health & Wellness Medical History Information Forms where provided; and
- Employee acknowledgement release forms for obtaining Driver’s Abstract Information.

Employees’ personal information will be used and retained for as long as may be reasonably required for the purposes described above.

- ***Customer Information***

We are committed to collecting, using and disclosing customers’ personal information responsibly and only to the extent necessary to serve our customers and related business purposes. EVEREADY will collect, use and disclose only such personal information as is required to service our customers. In this regard, we collect personal information from sources such as financing applications. Customers’ personal information may be used to determine whether EVEREADY will enter into a professional relationship, as well as for client communication, service and administration. It may be used for financing purposes, for billing and account services as they relate to our products and services, as well as to comply with legal and regulatory requirements.

When EVEREADY receives personal information from customers that enables us to provide customers with our services, we imply that customers’ consent to allow us to deal with that personal information in a reasonable manner is given. Providing us with your personal information is always your choice. When you request services from us, we ask that you provide information that enables us to respond to your request. In doing so, we imply that you consent to our collection, use and disclosure to appropriate third parties of such personal information for these purposes. It is also implied that you authorize us to use and retain this personal information for as long as it may be required for the purposes described above. Your consent remains valid even after the termination of our relationship with you, unless you provide us with written notice that such consent is withdrawn. If for any reason it becomes necessary for EVEREADY to use personal information for different purposes than those indicated, we will make reasonable efforts to contact you, our customers, in advance and obtain your consent.



**EVEREADY INDUSTRIAL GROUP LTD.
“Personal Information Privacy Protection”
POLICY continued**

Information We Share – Who Receives Information and Why

- ***Employee Information***

EVEREADY does not disclose any personal information about its employees, or former employees, to anyone except as permitted by law. EVEREADY does not sell employees’ personal information to others. EVEREADY may disclose personal information about employees with our corporate affiliates and other nonaffiliated third parties under certain circumstances for employment purposes such as to facilitate payroll, health and wellness, and insurance services, and for other purposes as referred to above or as permitted or required by law.

For example, we may disclose employees’ personal information to a credit reporting agency, to a person or entity who may require it for workers’ compensation, and to various government agencies and private suppliers of payroll benefit programs to administer wage and benefit payments and deductions.

- ***Customer Information***

EVEREADY will not sell customer lists or personal information to others. In providing our services, we may need to disclose the personal information we collect to other service providers or agents who perform various functions for us, provided such parties agree to keep all personal information confidential and secure. In certain circumstances, we may be required to provide personal information to third parties for legal or regulatory purposes.

Our service providers and agents, as part of their contracts with EVEREADY, are bound to maintain privacy consistent with the privacy legislation and may not use employees’ or customers’ personal information for any unauthorized purpose.

How We Protect Personal Information

EVEREADY understands that the protection of employees’ and customers’ personal information is of the utmost importance. EVEREADY maintains physical, electronic and procedural safeguards and policies to protect the privacy of personal information against unauthorized access and use. All safety and security measures vary and are appropriate to the sensitivity level of the information collected. We restrict access to personal information to only those who have reasonable purposes to know such information, and we educate our employees about the importance of confidentiality and privacy.



**EVEREADY INDUSTRIAL GROUP LTD.
“Personal Information Privacy Protection”
POLICY continued**

Employee and Customer Rights & Responsibilities

With some exceptions, EVEREADY’s employees and customers have the right to access, verify and amend the personal information which EVEREADY has about them. Employees and customers can help us keep personal information up-to-date by notifying EVEREADY about any inaccurate or outdated information that needs to be corrected.

Requests for information must be made to employees’ division manager or EVEREADY’s Privacy Officer – John Stevens, Chief Financial Officer.

Rod Marlin
President