

WEBSITE PRIVACY POLICY

This web site is the responsibility of St. Marys Cement Inc. (Canada), its affiliates and related subsidiaries ("VCNA"). VCNA can be contacted: (a) by mail at 55 Industrial Street, Toronto, Ontario, M4G 3W9; (b) by telephone Toll Free at (800) 268-6148 [Call: (800) 268-6148]; or (c) by email to legaldepartment@vcimentos.com.

1. Purposes of VCNA's Collection, Use and Disclosure of Personal Information

VCNA collects, uses, stores and discloses personal information of VCNA's web site visitors, potential customers and customers only as necessary to operate VCNA, and to provide goods and services to VCNA's customers. Operation of VCNA and providing goods and services to customers can include, but is not limited to, the following activities: verifying credit worthiness of potential customers, opening an account with customers, enabling customers to make online payments, providing information to customers about goods, services or new developments, processing orders and deliveries to customers, marketing VCNA, and compiling statistics for analytical and marketing purposes.

2. What Sources and Types of Personal Information Does VCNA Gather?

In collecting personal information, VCNA continuously strives to be in full compliance with applicable privacy legislation and otherwise conduct VCNA's information collection with utmost care and concern for privacy. VCNA may collect personal information directly from an individual when the individual purchases one of VCNA's products or services, applies for credit, makes an online payment or provides personal information to VCNA in the course of VCNA's dealings with the individual. We also collect contact and other information that visitors voluntarily provide when they communicate with VCNA via email or through VCNA's web site (for example, when they fill out a form).

Sometimes VCNA may also obtain information about an individual from other sources, for example:

- financial institutions, trade references and other third parties for the purposes of an application for credit;
- credit bureaus as part of a credit check;
- government agencies or registries; and other individuals or organizations that an individual has given consent for VCNA to contact.

VCNA may also collect personal information through the telephone, Internet, web site use, email, or paper based forms.

The kind of personal information VCNA may collect includes an individual's name, company name, e-mail address, phone number, fax number, address, type of business, payment card information, as well as such other personal information that is needed to fulfill the purposes identified in this Privacy Policy.

VCNA may automatically collect and/or track: (1) the home server domain names, email addresses, type of client computer, and type of web browser of visitors to VCNA's web site; and (2) user-specific information on what pages visitors access.

The VCNA website uses the following cookies:

- Google Analytics: this cookie is sent to Google servers to track an individual session's activities. This includes the visitor's IP address and which pages (s)he visited.
- SharePoint: this is a variable used by SharePoint to help display the page.

The VCNA Customer Portal uses the following cookies:

- Email ("Remember me"): this remembers the users' email so they don't have to enter it every time
- Authentication / Session Variables: these help prevent unauthorized access to secured data on the Portal
- Google Analytics: this cookie is sent to Google servers to track an individual session's activities. This includes the visitor's IP address and which pages (s)he visited.

Other information is collected by VCNA by way of the website when you fill out the Request for Quote forms or when you provide any requested information on the Customer Portal.

The above internet cookies are stored on the visitor's hard drive and are not stored, in any form, by VCNA. Visitors may decline the Internet cookie by using the appropriate feature of their web client software, if available.

When an individual applies for credit, VCNA may ask for financial and other information that VCNA considers to be relevant, which may include but is not limited to:

- trade references;
- bank account, credit card, and contact information; and copies of recent balance sheets, income statements and other financial statements.

Individuals should know that most applications for credit have an impact on the individual's credit rating as reported by a credit bureau and by applying for credit, the individual expressly consents to the collection, use and disclosure of personal information to third party credit bureaus and/or industry or trade associations.

3. Disclosure

Consent for the collection, use and/or disclosure of personal information may be obtained orally or in writing and may be expressly given or implied. By using the web site you are consenting to VCNA's internal use of collected information for the purposes of operating VCNA, and providing goods and services to VCNA's customers, as set forth in Section 1. In determining how VCNA obtains consent for disclosure to other parties, VCNA will take into account the sensitivity or the personal information about the individual that VCNA is collecting, using and/or disclosing.

From time to time, VCNA may disclose personal information or supply third parties with non-personal or aggregated data only if consent is given by the relevant individual or in the following circumstances:

1. to businesses that assist VCNA in operating VCNA and in providing services to VCNA's customers (for example to a payment processor or shipping company);
2. when permitted or required by law, such as in response to a subpoena or other legal process;
3. to a purchaser(s) of all or part of VCNA's assets, property, business and/or undertaking;
4. to meet legal obligations such as tax and regulatory reporting; or to third parties for: (i) market research and promotion to better tailor and improve the features of products and services and/or (ii) determining a credit rating.

4. Protecting Personal Information

VCNA protects confidential information of all types, including personal information, with organizational, physical, mechanical and electronic safeguards appropriate to the sensitivity of the information.

You acknowledge that the transmission of information over the internet is inherently insecure, and VCNA cannot guarantee the security of data sent over the internet.

5. Retaining Personal Information

VCNA will retain personal information only as long as reasonably necessary to fulfill the identified purpose or legal or business purpose. With respect to an application for credit, VCNA will retain an individual's personal information for so long as reasonably necessary to complete VCNA's dealings with the individual, or as may be required by law, whichever is longer.

6. Collection of Personal Data from Children

VCNA's web site is not intended for or marketed to persons under the age of 18 years. VCNA does not knowingly collect or post information from children under the age of 13 years. No information should be submitted to this site by guests under 13 years of age.

7. VCNA's Right to Contact User

VCNA reserves the right to contact site visitors regarding its privacy policy, or any other policies or agreements relevant to site visitors.

8. VCNA's Right to Change Privacy Policy

VCNA reserves the right to change this policy at any time by posting and distributing the then current policy. Changes will be effective immediately upon posting.

9. Accountability

VCNA has designated a Privacy Officer to handle privacy matters and enquiries regarding personal information.

10. Access, Questions and Concerns

If an individual has any questions, wishes to request access to personal information, correct personal information, or make a complaint, please write to VCNA's Compliance Department at:

Compliance Department
55 Industrial Street, Toronto, Ontario, M4G 3W9
Email: legaldepartment@vcimentos.com
Telephone: 1-800-268-6148

If you are not satisfied with a response, the Office of the Privacy Commissioner of Canada can be reached at 30 Victoria Street, Gatineau, Quebec, K1A 1H3 1-800-282-1376.