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**St. Marys Cement Inc. (Canada)
VCNA External (Website) Privacy Policy**

This web site is the responsibility of St. Marys Cement Inc. (Canada), its affiliates and related subsidiaries ("VCNA").

This Privacy Policy describes the manner in which VCNA collects, uses and discloses personal information through our web sites located at www.votorantimcimentos.com or www.stmaryscement.com and through other interactions with us, including visitors such as job applicants, potential customers, and customers.

For inquiries related to this policy, the VCNA Privacy Officer can be contacted: (a) by mail at 55 Industrial Street, Toronto, Ontario, M4G 3W9; (b) by telephone locally at (416) 696-4411 or Toll Free at (800) 268-6148; or (c) by email to privacy.officer@vcimentos.com

1. How do we collect personal information?


In general, we collect personal information that you provide to us directly through our web sites or through other means, such as through our online Customer Portal, by email, telephone or paper-based forms. We also collect information automatically when you visit our web sites as described under Section 4. In certain circumstances, such as when we obtain consent to conduct a credit check, we will obtain your consent to collect your personal information from third party sources such as credit bureaus. We may also collect personal information from financial institutions, government agencies or registries, and other individuals or organizations that you have provided us with consent to contact.

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

VCNA collects, uses, stores and discloses personal information as necessary to operate VCNA, and to provide goods and services to VCNA's customers. We may collect and use personal information in connection with the following activities:

- opening an account with customers,
- processing orders and deliveries to customers,
- enabling customers to make online (or other) payments,
- verifying credit worthiness of potential customers,
- providing information to customers about goods, services or new developments,
- sending marketing communications about VCNA,
- processing and responding to job applications, and
- visiting our web sites, including compiling statistics for analytical and marketing purposes.

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3. What Personal Information Does VCNA Collect and Use?

Accounts, Orders and Payments: VCNA collects personal information in order to create and administer customer accounts, process orders, deliveries and payment for orders. The information we collect includes your name, company name, email address, phone number, fax number, address, type of business, payment card information, signature.

Applying for Credit: If you apply for credit for your business, we will ask you to complete a credit application that will collect information about your company and owner, including name and contact information for the company and principal owner, type of business, taxpayer ID, annual sales, and company bank account number, in order to help us assess your application and eligibility for credit. We may also collect trade references for the purposes of obtaining a reference on the company and owner.

Credit Checks: We also obtain your consent to conduct a credit check in order to assess your loan application, verify your current creditworthiness and to manage and assess our risks. The information we collect from credit bureaus may include the types and amounts of credit advanced to you, payment histories, negative banking items, collection actions, legal proceedings, previous bankruptcies and other information reported by your creditors. Individuals should know that most applications for credit have an impact on the individual's credit rating as reported by a credit bureau. You do not have to provide your social insurance number, however, if you are a sole proprietor and choose to provide it we will share it with the credit bureau for matching purposes and to ensure that we obtain accurate information.


Request a Quote or other Information: 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 Request for a Quote or other form) or otherwise request information about our products and services. We use this information promptly answer your question or respond to your request. We may retain this information to assist you in the future and to improve our customer service and service offerings.

Marketing: If you sign-up to receive information about our products and services, we collect your name and email address. You can unsubscribe at any time by clicking the "unsubscribe" link included at the bottom of each email. Alternatively, you can opt-out of receiving email marketing communications by contacting us at the contact information provided in the "Contact Us" section below. Please note that you may continue to receive transactional or account-related communications from us.

Surveys: From time to time, we may offer you the opportunity to participate in one of our surveys. The information obtained through most of our surveys is used in an aggregated, de-identified form. We use this information to help us understand our customers and improve our products and services.

Job Applications: If you contact us to apply for a job at VCNA, you may provide us with certain personal information about yourself, such as information contained in a resume, cover letter, or similar employment-related materials. We use this information for the purpose of processing, assessing and

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responding to your application for current and future career opportunities. We may also obtain your consent to conduct background verifications or reference checks, appropriate to the job in question.

Visiting our Web sites: You do not have to register to visit or use our web sites. However, we do collect some personal information when you visit our web sites. Please see "Information about our web sites," below, for detailed information regarding the personal information we collect when you visit and use our web sites, and the choices you have with regards to that collection.

4. Information about our Web Sites

Visiting our web sites: In general, you can visit our web sites without telling us who you are or actively submitting any personal information. However, we collect the IP (Internet protocol) addresses of all visitors to our web sites and other related information such as home server domain name, page requests, browser type, operating system and average time spent on our web sites. We use this information (and other information that may be associated with you, your browser, or your IP address that is described in the "Cookies" and "Analytics" sections below) to help us understand our web sites activity and to monitor and improve our web sites.

Cookies: Our web sites use a technology called "cookies". A cookie is a tiny element of data that our web sites sends to a user's browser, which may then be stored on the user's hard drive so that we can recognize the user's computer or device when they return. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our web sites, you may not be able to take advantage of all of the web sites features.


In addition, 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 to prevent unauthorized access to secured data on the Portal.

Analytics: We may use a third party such as Google Analytics to help us gather and analyze information about the areas visited on the web sites and Customer Portal (such as the pages most read, time spent, search terms and other engagement data) in order to evaluate and improve the user experience and the web sites. These third parties may use cookies and other tracking technologies. For more information about Google Analytics or to prevent the storage and processing of this data (including your IP address) by Google, you can download and install the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>, and then only visit our site from the browsers in which you installed that plugin. You can also obtain additional information on Google Analytics' data privacy and security at the following links:

- <https://policies.google.com/technologies/partner-sites>; and

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- <https://support.google.com/analytics/topic/2919631>

Third Party Links: Our web sites may contain links to other web sites that VCNA does not own or operate. We provide links to third party web sites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked web sites. The linked web sites have separate and independent privacy policies, notices and terms of use. We do not have any control over such web sites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked web sites may collect, use or disclose, secure and otherwise treat personal information. We encourage you to read the privacy policy of every web sites you visit.

5. Sharing of Personal Information

From time to time, VCNA may share or disclose personal information in the following circumstances:


Service Providers: Your personal information will be transferred (or otherwise made available) to certain third parties (including our parent company) that provide services to us or on our behalf. We use service providers to provide services such as hosting the Website and customer data, processing payments, delivering shipments, and providing advertising and marketing services. Our service providers may be located outside of the jurisdictions in which we operate (including Quebec), and may have access to, store or otherwise process personal information in the U.S., Brazil, Canada or other foreign jurisdictions.

Legal and Compliance: We and our Canadian, Brazil, US and other foreign service providers may provide your personal information in response to a search warrant to other legally valid inquiry or order, or to another organization for the purposes of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud. We may also disclose your personal information to meet our legal obligations such as tax and regulatory reporting and or as otherwise may be required or permitted by applicable Canadian, U.S. or other law or legal process, which may include lawful access by US or foreign courts, law enforcement or other government authorities. Your personal information may also be disclosed where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.

Sale of Business: We may transfer any information we have about you as an asset in connection with a proposed or completed merger, acquisition or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of VCNA or as part of a corporate reorganization or change in corporate control.

Credit Bureaus: With your consent, we will share your name, date of birth and, if you are a sole proprietor, your social insurance number (if provided on an optional basis) with credit bureaus to obtain a credit report, as described above.

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6. Safeguarding Personal Information

VCNA takes steps to protect confidential information of all types, including personal information, from unauthorized access, use and disclosure. Depending on the specific context, these steps may include various organizational, physical, technical and electronic safeguards for the information.

7. Retention of Personal Information

We have record retention processes designed to retain personal information only as long as reasonably necessary to fulfill the identified purpose or to otherwise meet a legal or business purpose.

8. Changes to Our Privacy Policy


VCNA may change this policy at any time to reflect changes in our personal information practices. We will post or otherwise distribute the then current policy. We encourage you to periodically review this page to ensure you are familiar with those changes. We will indicate at the top of this privacy policy when it was most recently updated.

9. Your Rights

Subject to applicable law, and depending on your country of residence, you have the right to access, update and correct inaccuracies in your personal information in our custody or control. You may request access, updating and corrections of inaccuracies in your personal information in our custody or control by emailing or writing to us at the contact information set out below. We may request certain personal information for the purpose of verifying the identity of the individual seeking access to his or her personal information records.

Subject to applicable law, and depending on your country of residence, if we have obtained your consent to process your personal information, you can withdraw your consent any time by contact us as set out below. Please note that we may need to retain certain information to meet our legal, regulatory or contractual obligations.

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10. Accountability

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

If you have any questions or complaints about our privacy practices, or wish to request access to or correction of personal information, please write to VCNA's Chief Privacy Officer at:

Chief Privacy Officer
c/o Legal Department
St. Marys Cement Inc. (Canada)
55 Industrial Street, Toronto, Ontario, M4G 3W9
Email: privacy.officer@vcimentos.com
Telephone: (416) 696-4411 or Toll Free at 1-800-268-6148

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