

Website Privacy Policy

We at Clifton Capital (the "Company") are committed to maintaining the privacy and security of the Personal Information of all our employees, customers as well as visitors to our Company website. As a part of that commitment, the Company has implemented this Privacy Policy to apply to our Company website owned and operated by the Company, so that you know what information about you we collect, why we collect it, how we use that information, the choices we offer, including how to access and update information. Your privacy matters to us, so please do take the time to get to know our practices – and if you have any questions, contact us at info@clifftoncapital.com.

Information We Collect

The Company collects personal information about you when you voluntarily provide it or through the use of Cookies. Personal information may include, but is not limited to, any information that is about you or could be used to identify you, such as your name, email address, mailing address, telephone number, and any optional personal information that you supply to us through the website.

Purposes for Collecting Your Personal Information

We collect your personal information to provide better services to all of our website users – from providing, maintaining, protecting and improving our website, to providing you with information you have requested, product information, product support **[and promotions]**.

Consent

Whenever you voluntarily provide information through your access to or use of this website, or by contacting the Company through other means, you consent to the collection, use and disclosure of that information in accordance with the provisions of this Privacy Policy.

How We Collect Your Personal Information

When you visit our website and complete the Contact Us section, or submit a completed form such as a Web Application to receive information, design boards or tools, you will be asked to provide personal information (such as name, email address, telephone number, mailing address and details about your home and renovation project) for the purpose of administering your request and contacting you. When you provide your contact information, we may also ask you to provide optional personal information such as demographic information (e.g. age) and profile information (e.g. purchasing preferences, experience in home renovations). It is not necessary to provide this optional personal information in order to receive a response to your request.

In addition, at the time you provide your personal information you may be given the opportunity to opt-in to receiving updates and notifications regarding special promotions, new products and other information about our company, which may interest you ("Promotional Mailings"). If you authorize us to send you Promotional Mailings, we may do so by using either the e-mail or the mailing address you provided. If you no longer wish to receive Promotional Mailings, send us an email at info@clifftoncapital.com indicating you no longer wish to receive such mailings from us.

Finally, the Company may collect information voluntarily provided by you, via the website or otherwise, for the purposes of recruitment opportunities.

Changes

The Company reserves the right to change this Privacy Policy at any time without notice. Your use of or access to the website indicates your acknowledgement of this Privacy Policy and consent to the collection, use and disclosure of your personal information in accordance with this Privacy Policy. The Privacy Policy posted at any time shall be deemed to be the Privacy Policy then in effect. This Privacy Policy was last updated in november 16, 2023.

Cookies

Cookies are small data files that are sent to your browser and stored on your computer's hard- drive when you visit certain websites, thereby "tracking" your use of the website. Our cookies do not contain any personally identifying information other than your IP address and server location. We use cookies to analyze web traffic and allow you to access certain areas of our website and to give you maps and locations of contractors if you request. Most browsers automatically accept cookies, but you can set your browser to refuse cookies or to alert you when cookies are being sent.

Use of Information

The Company uses personal information of visitors to our website in order to respond to your request or, if you checked the opt-in box, to send you Promotional Mailings.

The Company may also use your personal information to create aggregated information that does not allow you to be personally identified or contacted. Rather than showing individual activity, aggregated information shows user behaviour as a whole (for example, information might be compiled in order to calculate the number of customers living in certain geographic areas). Aggregated information is used to evaluate the use of our website for development of the website, new products and services and marketing initiatives. The Company may disclose aggregated information to its affiliates and to agents appointed by it for purposes of administration or operation of the website.

When We Disclose Your Personal Information

Except as provided in this Privacy Policy, the Company does not disclose, give, rent or sell your personal information collected through the website to any third party. Access to your personal information is restricted to selected Company employees, representatives, contractors, dealers, suppliers or agents ("Agents").

Agents appointed by the Company to assist with or operate the website, administer your requests, provide the information you are seeking or administer the Company's marketing programs will have access to your personal information for these purposes. Such Agents are required by the Company to comply with the provisions of this Privacy Policy and are prohibited from disclosing personal information to third parties except as required by law.

The Company reserves the right to cooperate fully with local, provincial and federal officials in any investigation relating to any personal information (including private electronic communications

transmitted on the Company website) or any purported unlawful activities.

The Company reserves the right to disclose and/or transfer personal information to a third party in the event of a proposed or actual sale, merger or other transfer of the assets or shares of the Company, an affiliate or division thereof, provided that the third party agrees to adhere to the principles expressed in this Privacy Policy and the personal information does not constitute all or substantially all of the assets being transferred.

How We Protect Your Personal Information

The Company makes all commercially reasonable efforts to ensure that personal information collected from you is protected against loss and unauthorized access. Personal information is collected and stored in a secure manner as required by the Company.

Retention and Destruction of Personal Information

Documents regarding your personal information will be retained only for the period required by law or as operationally necessary and then destroyed/erased in a confidential manner.

Links to Third Party Website

The website managed by Clifton Capital may offer links to other websites. You should be aware that operators of linked websites might also collect your personal information (including information generated through the use of cookies) when you link to their websites. The Company is not responsible for how such third parties collect, use or disclose your personal information, so it is important to familiarize yourself with their privacy policies before providing them with your personal information.

Contacting Us

If you have any questions about this Privacy Policy or if you have reason to believe that the Company has failed to adhere to this Privacy Policy, please contact 514-274-2000 or by email, info@clifftoncapital.com.

Employees wishing to request access to their own personal information should contact , the Human Resources Manager at 514-274-2000. You may request that your personal information be modified or deleted from our databases, or those of our agents, by sending a request to info@clifftoncapital.com.