


Data Privacy Policy		
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J2 Management Corp., inclusive of A.G. Simpson Automotive Inc., A.G. Simpson, (USA) Inc., Tiercon Corp., Coplas Inc., and all other subsidiaries (collectively referred to as the “Company” or “J2” in this Policy).

1. Purpose

This Policy explains how the Company collects, uses, discloses, and safeguards personal information collected including but not limited to information the Company collects through its website and other on-line and digital platforms. This Policy is intended to be read in conjunction with the Company Employee Privacy Policy.

2. Scope

This Policy applies to all stakeholders, including the Company’s customers, employees, suppliers, and contractors.

3. Type of Information Collected by the Company

The Company only records and collects personal data necessary for its respective purpose (principle of data minimization). Additional information may be given voluntarily. Unless required by law, there is no obligation to provide personal data. However, when requested information is withheld, the Company has the discretion to deny access to the contents and services on its website. Below is a list of the type of personal data the Company collects.

i) Customer Information

The Company collects names, email addresses, postal addresses, telephone numbers, job functions, and transaction details for customers or representatives of its customers.

ii) Supplier Information


For suppliers or service providers or employees or representatives of its suppliers or service providers, the Company collects names, email addresses, postal addresses, telephone numbers, job functions, and the details of the transactions it conducts.

ii) Recruitment Information

For job applicants, the Company collects the name, contact details (including address, phone number and email address), identification details, job title, employment history and education details, names and contact details of referees, or other personal data if required by applicable law.

iv) Personal Information Collected by Visitors on its Website

For visitors to its website, the Company web server temporarily saves, by default, the connection data of the inquiring computer, the date and duration of the visit, the identification data of the browser and operating system type used, and the website that visited the Company website. Personal data beyond this, such as name, address, phone number, or email address, will only be collected if this information has been voluntarily provided.

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Personal data provided voluntarily by completing forms on the Company website.

Personal data contained in messages when posted voluntarily on the Company's social media accounts.

Personal data in communications, such as reporting concerns or comments through the Company website.

v) Personal data from third parties. Examples of such data includes but is not limited to:

- recruiters and employment agencies;
- results of reference check results, including background checks;
- referees have who have provided support of a job application.

4. Purpose and Use of Data Collected


The Company uses personal information as follows:

- For the completion of a contract or purchase order;
- To provide and respond to requests for information from customers and suppliers about products and services;
- To conduct internal business and management processes, for example, accounting or auditing purposes;
- For employment purposes, where necessary for the decision on the establishment of an employment relationship, the fulfillment of the employment or termination, or to comply with legal requirements;
- For inquiries and dealing with complaints
- For the technical administration of websites; to keep the Company website safe and secure and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- To fulfill legal obligations or regulatory requirements.

5. Disclosure of Personal Data

The Company does not disclose, sell, or transfer personal data to third parties for any reason and for any purpose unless necessary to perform a contract, fulfill legal obligations, or with written consent. The Company does not share personal data collected with any third parties for marketing or promotional purposes.

Where personal data must be transferred to an external service provider to perform a service or answer an inquiry, the Company will take all technical and organizational measures necessary to ensure that the legal requirements for data privacy are observed.

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Furthermore, the Company is committed to legal data privacy regulations, to the confidential handling of personal data, and to the deletion of this data when it is no longer needed.

The Company may share personal information internally for business and operational purposes.

6. Security and Storing of Personal Information

The Company uses administrative, technical, and physical security measures to help protect personal information. While the Company will take reasonable steps to secure the personal information, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse.

7. Policy for Children

The Company does not knowingly solicit information from or market to children under the age of 13. If the Company becomes aware that it has collected personal information from a child under age 13 without verification of parental consent, the Company will immediately delete that information as quickly as possible.

8. Changes to This Privacy Policy

The Company may update this Policy from time to time to reflect, for example, changes to its practices or for other operational, legal, or regulatory reasons.

9. Social Media Platforms

Communication, engagement and actions taken through external social media platforms in which the Company participates is subject to the terms and conditions as well as the privacy policies of those social media platforms.

Dated: August 13, 2024	
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