



CUSTOMER PRIVACY NOTICE

This Privacy Notice informs customers of how Greymane Contracting uses their personal information (inclusive of any sensitive personal information). It is a live document and will be consistently under review and updated, as needed, to comply with Bermuda law and any new guidance from the Privacy Commissioner or the Government of Bermuda.

Who are Greymane Contracting Ltd.?

Greymane Contracting Ltd. is a B2B construction warehouse specializing in interior drywall fit-out and exterior coatings, sealants and roofing products that are available to both contractors and prosumers alike.

Legal Status of this Notice

From January 1st 2025, PIPA (Personal Information Protection Act 2016) places all individuals, private entities and public authorities using personal information in the jurisdiction of Bermuda under legal obligation to protect said information. A requirement of those obligations is the provision of a Privacy Notice to individuals by the time their personal information is collected, or as soon as possible thereafter.

Greymane Contracting Ltd. has prepared this Customer Privacy Notice for circulation to provide information to individuals and entities alike who are or may become customers of their rights under PIPA legislation and Greymane Contracting Ltd.'s obligations in using personal information.

Key Definitions

PIPA establishes the following statutory terms as referred to in this Customer Privacy Notice.

- **Personal Information** means any information about an identifiable or identified individual.
- **Privacy** is the right of an individual to be left alone and in control of information about oneself.
- **Use or Using** of personal information is a defined term in PIPA that means “carrying out any operation on personal information, including collecting, obtaining, recording, holding, storing, organizing, adapting, alerting, retrieving, transferring, consulting, disclosing, disseminating or otherwise making available, combining, blocking, erasing or destroying it”.
- **Sensitive Personal Information** is a defined term in PIPA that includes information relating to such aspects as place of origin, race, color, sex, sexual life, health, disabilities, religious beliefs, and biometric and genetic information.



Our Privacy Officer

Greymane Contracting Ltd. has appointed a Privacy Officer who will have primary responsibility for communicating with the Privacy Commissioner and/or members of the public to contact if they have any questions or concerns regarding how we use personal information. The Privacy Officer's name and contact information is:

Richard Lines
rlines@buildersdepot.bm
Privacy Officer
Forte Group
12 Bakery Lane
Hamilton
Pembroke, HM 07

We aim to meet the highest standards when using both personal and sensitive personal information of our customers. We encourage our customers to bring queries and concerns about PIPA-related issues to the attention of our Privacy Officer.

Personal Information used by Greymane Contracting Ltd.

Builders Depot Ltd. keeps records of our customers' purchasing and payment history, company structure for credit reference confirmation and/or submission to the Bermuda Credit Association along with billing contact information. Information on company structure, inclusive of directors and ownership details, is requested only in the event the account is not in good standing and subsequently submitted to the Bermuda Credit Association for debt recovery proceedings.

Video is recorded and stored on site, covering the sales floor, warehouse, parking lot, staff parking lot, office/showroom and hallway outside of Greymane Contracting Ltd.'s office door. Video evidence will be used for cases of suspected shoplifting, confirmation of materials being loaded onto or into customer vehicles, driving accidents that occur on our property involving customer(s) of Greymane Contracting Ltd., and/or other businesses who also utilize the parking area and/or Greymane Contracting Ltd. and Forte Group employees.

Personal information we will ask for or obtain:

- Name
- Date of Birth
- Business Address
- Personal Address(es) of all Directors
- Contact information inclusive of telephone numbers for all named billing contacts and company directors, and/or owners.



- Evidence of customer consent(s) to use of Personal Information
- Video evidence of your person and/or vehicle (inclusive of license plate, make, model and color of said vehicle(s)) using the customer parking lot, sales floor, warehouse or office.

Disclosure of Personal Information

Greymane Contracting will normally not consent to the disclosure of client personal information. There are times however, when we may make disclosures of customers' personal information without their express consent:

- Greymane Contracting Ltd. employees for the sole purpose of the performance of their duties in line with the reason for processing. Our employees are required to maintain the confidentiality of the information and are not permitted to use it for any purposes other than to perform the business functions assigned.
- Third-party agents, service providers or contractors engaged by us to perform services on our behalf, such as web-hosting companies, information technology providers (including, document management providers), analytics providers, marketing and communications services and event hosting services, or our own advisors, auditors and accountants, professional indemnity insurers and financial institutions with whom we or you transact (including where the information is required as part of that third party's own processes to satisfy their legal or regulatory obligations, such as anti-money laundering checks).
- A formal court order has been issued, or there is any other legal requirement to do so; such as to a Government Authority.
- Where a serious crime is being investigated or where it could be prevented.
- In the event of an accident, where Personal information required to identify a customer to emergency services so that appropriate care may be administered.
- Your company structure is that of a Sole Proprietor and your personal contact information is also your business contact information.

Access to Personal Information

To obtain access to, or make a request for a correction to, your personal information, or to exercise any other rights that you have under PIPA, please submit a written request to the Privacy Officer, which must include sufficient information to enable us, with reasonable effort, to identify the personal information that is relevant to your request. Your request must also include all necessary contact information for us to respond to your request. You will be contacted by one of our privacy administrators promptly to confirm our receipt of your request, but no more than two business days after we have received your request. Please note the following information associated with any request that we receive from you:

- We require your accurate and complete name and contact information.



- We will confirm receipt of your enquiry or instructions within 48 hours after we have received the same.
- We will take a reasonable amount of time to process your enquiry or instructions and initially respond to your request, but usually no more than 45 days (depending upon the nature and complexity of your request).

Greymane Contracting Ltd. reserves all of its rights and protections afforded to it under PIPA. Greymane Contracting Ltd. reserves the right to update and revise this Privacy Notice at any time, as we may determine to be prudent or necessary to reflect changes in our privacy practices or legal requirements.

Third Party Transfers

At Greymane Contracting Ltd., we sometimes share personal information with carefully selected third-party service providers who support our business operations. We are committed to protecting your personal information and ensuring that any such transfers comply with the Personal Information Protection Act 2016 (PIPA) of Bermuda.

Who We Share Information With

We only share personal information when it is necessary for operational or legal reasons. This may include:

- Fireminds Ltd. (Bermuda) provides our secure Virtual Desktop Infrastructure (VDI) environment, enabling our staff to access company systems and data remotely.
- Coins Global ERP System – provides our enterprise resource planning (ERP) platform used for project management, finance, and human resources functions.
- Secure Remote Servers in the United States – used for data hosting and backup to support our business continuity and IT operations.

These service providers act on our behalf and are required to protect your personal information to the same standard required under PIPA.

Safeguards and Contracts

Before sharing personal information, we:

- Conduct due diligence on each service provider's privacy and security practices
- Enter into written agreements that:
 - Limit their use of personal information to specific, authorized purposes
 - Require strict confidentiality and data security measures
 - Require prompt notification of any data breach or unauthorized access

All providers are contractually prohibited from using your personal information for their own purposes.

Cross-Border Data Transfers



Where personal information is stored or processed on servers outside of Bermuda (for example, in the United States), we ensure that:

- The destination offers a level of protection comparable to that required by PIPA, or
- We have implemented contractual safeguards approved by the Privacy Commissioner, or
- We obtain your consent before such transfers where appropriate

We maintain records of all cross-border transfers, and this information is available on request.

Security And Access Controls

All third-party systems that handle personal information are required to use:

- Encryption of data at rest and in transit
- Multi-factor authentication (MFA) and secure user access controls
- Monitoring and audit logging of all access to personal information

Access is granted only on a “need-to-know” basis to authorized personnel.

Breach Notification

If any third party experiences a breach of security involving your personal information, they must:

1. Notify us immediately, and
2. Cooperate fully with our investigation and containment measures

If we determine that there is a real risk of significant harm to you, we will notify you and the Privacy Commissioner of Bermuda as required by PIPA.

Retention and Disposal

Third-party providers may only retain your personal information for as long as is necessary to provide their services to us. When their services end, they must either:

- Securely return all personal information to us, or
- Securely destroy it and provide us with a certificate of destruction

Your Rights

You may request details about:

- Which third-party service providers hold your personal information
- Where your personal information is stored
- What safeguards are in place to protect it

You can make these requests by contacting our Privacy Officer at:

✉ rlines@buildersdepot.bm