

TOPCO OILSITE PRODUCTS LTD.

External Privacy Policy

At Topco Oilsite Products Ltd. ("**Topco**", "**we**", "**us**" "**our**"), we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that Topco collects from or about you and how we use and to whom we may disclose that information.

Topco has developed a series of documents in order to address the specific privacy concerns of certain groupings of individuals. This Privacy Policy applies to the personal information of all individuals, unless the personal information is related to the employment of an individual who seeks to be, is or was employed by Topco.

If you are unsure if this Privacy Policy applies to you, please contact our Privacy Officer (using the contact information set out below) for more information.

Privacy Policy Effective for Canada

It is Topco's policy to comply with the privacy legislation in force in each jurisdiction in which we operate. Sometimes the privacy legislation or an individual's right to privacy (or both) are different from one jurisdiction to another. This Privacy Policy covers only those activities that are subject to the privacy laws in force in Canada (whether federal or provincial/territorial), as applicable.

This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Policy applies to you, please contact our Privacy Officer (using the contact information set out below) for more information.

What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications.

What Personal Information do we Collect?

We collect and maintain different types of personal information in respect of the individuals with whom we interact. This includes:

- contact and identification information, such as your name, address, telephone number and e-mail address;
- product and service related information concerning the products and services that we provide to, or receive from, you;
- credit and financial information (to enable us to obtain and verify your credit related information);
- business relationship information, including information related to your agreements, preferences, advisors and decision-makers, feed-back and information requested by or provided to you.

We may also collect market-related information (which may include personal information) concerning market trends and activities affecting our business. This information may include contract terms, financial information and other information for the purpose of market analysis and strategic planning. We may also collect information related to any media, investor and public relations activities undertaken by us.

As a general rule, Topco collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).

From time to time, we may utilize the services of third parties in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

Privacy and our Website

You can visit our website without telling us who you are or revealing any information about yourself, including your e-mail address. Our web server may collect information related to your visit to our website, including the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page that is viewed by that IP address and what country you are from. We use this information to monitor our website's performance (such as number of visits, average time spent, page views) and for our business purposes such as working to continually upgrade our website.

In addition, we collect the personal information that you submit to our website, such as your name, address and any other contact or other information that you choose to provide by:

- using the "contact Topco" portion of this website;
- applying for a position with Topco through our website; or
- by corresponding with a representative of Topco via e-mail using the hyperlinks created for that purpose.

As well we may collect personal information that we receive from you via affiliate or referral partners, digital marketing, tradeshows, or interaction at physical locations.

Where you request information from us, we may use the e-mail address that you provide to send you information about offers on products and services that we believe may be of interest to you. If you have asked us to put you on an e-mail mailing list and provide you with certain information on a regular basis, or if we send you information about our offers on products and services by e-mail, you may ask us to remove you from the list at any time (using the unsubscribe instructions provided with each e-mail and on the site where you signed up).

Our Websites and Portals

We use websites to share and collect information and may provide specialized web based portals to provide information, programs, training or to facilitate transactions. We also collect certain information when you visit our website or portals. You can visit our website without telling us who you are or revealing any information about yourself, including your e-mail address. Our web server may collect information related to your visit to our website, including the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page that is viewed by that IP address and what country you are from. We use this information to monitor our website's or social media performance (such as number of visits, average time spent, page views) and for our business purposes such as working to continually upgrade our website and social media.

To visit our portals, as applicable from time to time, we collect personal information in order to verify your authority to use the portal, and to manage the information available to you, and to protect the security of the portal.

How Do We Use Cookies?

When you visit the website, the website might place a "cookie" on the memory of your computer or other smart device to track your visit. A cookie is a small data file that is transferred to your memory through your web browser that can only be read by the website that placed the cookie on your memory. The cookie acts as an identification card and allows our website to identify your device and to record your preferences.

We may choose to enable cookies in a password protected portal on the Topco website. In such cases, if applicable, a cookie allows us to track your visit to the website so that we can better understand your use of our website so that we can customize and tailor the website to better meet your needs.

Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (1) notify you prior to a website placing a cookie on your memory so that you can decide whether or not to accept the cookie; or (2) to automatically prevent the placing of a cookie on your memory.

Google Analytics

Google Analytics is installed on our website in order to provide information on visits to our website. We have not enabled the advertising feature in that program. We understand that the program will place Google cookies on the memory of your computer or other smart device and will record, location information. To provide website visitors the ability to prevent their data from being used by Google Analytics, Google have developed the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js). If you want to opt out, download and install the add-on for your web browser. The Google Analytics opt-out add-on is designed to be compatible with Chrome, Internet Explorer 11, Safari, Firefox and Opera. In order to function, the opt-out add-on must be able to load and execute properly on your browser. For Internet Explorer, 3rd-party cookies must be enabled. You may be able to locate an add-on for your browser by searching for your browser type and the term “Google Analytics opt-out browser add-on”.

Online Publications

Topco subscribes to some online publications that share with Topco certain analytics on user visits to the publication. This allows Topco to gather information on how users respond to Topco’s advertisements and information. The publisher allows Topco to see how many users have looked at Topco’s page or ad, how long users stayed on the page and if users clicked on Topco’s links.

What about Links to other Websites?

Our website may contain links to other websites, which may be subject to less stringent privacy standards. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. Topco is not responsible for the collection, use or disclosure of your personal information by such third parties. You should review the privacy policies of these websites before providing them with personal information.

Why Do We Collect Personal Information?

Topco collects personal information to enable us to provide products and services to you and to manage, maintain, and develop our business and operations, including:

- to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested;
- to establish, maintain and manage the provision of services involving the inspection and recertification of high pressure iron, high pressure pumping components and overhead sucker rod handling equipment;
- to establish, maintain and manage the provision of services involving the inspection and repair of high horsepower pumps;
- where you have requested credit, as necessary for the collection of payment and protection of our business;
- to be able to review the products and services that we provide to you, so that we may understand your requirements for our products and services and work to improve our products and services;

- to be able to review the products and services that we obtain from you, so that we may work with you and so that you may understand our requirements for such products and services;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to protect us against error, fraud, theft and damage to our goods and property, including verifying your identity;
- to enable us to comply with applicable law or regulatory requirements; and
- any other reasonable purpose to which you consent.

How Do We Use and Disclose Your Personal Information?

We may use or disclose your personal information:

- for the purposes described in this Privacy Policy; or
- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

We may disclose your personal information to our trusted service providers who provide data processing and storage services to us. Topco and its trusted service providers to whom we disclose personal information under this policy may perform activities outside of Canada (such as in the United States of America or in Europe). As a result, your personal information may be securely used, stored or accessed in other countries and may be subject to the laws of those countries. For example, information may be disclosed in response to lawful demands or requests from government authorities, courts, or law enforcement agencies in those countries.

We may use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

When do we Disclose Your Personal Information?

We may share your personal information with our employees, contractors, consultants and others who require such information to assist us with managing our relationship with you, including third parties that assist Topco in the provision of services to you and third parties whose services we use to conduct our business. Third parties may include related parties who process and store your personal information for us.

For example, as noted above, our trusted service providers may provide certain information technology and data processing services to us from time to time so that we may operate our business, and as result, your personal information may be collected, used, processed, stored or disclosed in the United States of America or elsewhere.

Where you have requested credit, we may share your personal information with credit bureaus, credit reporting agencies and financial institutions (in connection with the provision of services to you and for the protection of our business).

In addition, personal information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of Topco or the grant of a security interest covering all or a part of the assets of Topco or its affiliates through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such other party is bound by a confidentiality agreement or similar agreement or obligation, and is required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- in order to administer or service your credit with us;
- to protect the rights and property of Topco;
- during emergency situations or where necessary to protect the safety of a person or group;
- where the personal information is publicly available; or
- with your consent.

Your Consent is Important to Us

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection, but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

As we have described above, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

Choice/Opt-Out

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Privacy Officer (using the contact information set out below). All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

In certain circumstances, the withdrawal of consent may render us unable to continue to provide products or services to you (where the collection, use or disclosure of your personal information is necessary to provide the product or service).

We assume that, unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

How is Your Personal Information Protected?

Topco endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

The security of your personal information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please inform our Privacy Officer of this change (using the contact information set out below).

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

Access to Your Personal Information

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Privacy Officer (using the contact information set out below). Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Privacy Officer (using the contact information set out below).

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, all or a portion of your personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

Inquiries or Concerns?

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Privacy Officer by telephone, in writing or by e-mail (using the contact information set out below). We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you remain dissatisfied with the response of our Privacy Officer, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

Privacy Officer

We have appointed a Privacy Officer to oversee compliance with this Privacy Policy. The contact information for our Privacy Officer is as follows:

By Email to:
privacy@topcooilsite.com

By Mail to:
Privacy Officer
Topco Oilsite Products Ltd.
Bay 5
3401 - 19th Street NE
Calgary, AB T2E 6S8
Attention: Privacy Officer

Revisions to this Privacy Policy

Topco from time to time, may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this Privacy Policy on our website www.topcooilsite.com and we encourage you to refer back to it on a regular basis.

This Privacy Policy was last updated on May 31, 2019.

Interpretation of this Privacy Policy

Any required interpretation of this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples, but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'.

This Privacy Policy does not create or confer upon any individual any rights, or impose upon Topco any obligations outside of, or in addition to, obligations imposed by privacy laws in force in Canada (whether federal or provincial/territorial), as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and privacy laws in force in Canada (whether federal or provincial/territorial), as applicable, this Privacy Policy will be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.