

# **PRIVACY POLICY**

**duBreton inc.**

Your privacy and the protection of your personal information are important to us. The purpose of this Privacy Policy is to inform you of our personal information practices. It applies to the collection, use and disclosure of your personal information as a customer or user of the website or any of our services or information tools such as our social media sites like Facebook, Twitter, Instagram, LinkedIn and YouTube.

## **1. SCOPE OF APPLICATION**

duBreton is a member of the duBreton Group family of affiliated companies. This policy applies to personal information in our possession or control, including information we have exchanged with other duBreton Group companies and information disclosed to third parties for storage or processing. However, this policy does not apply to third parties with whom you are invited to communicate, for example, through our Web site. This policy is designed to comply with privacy laws and to explain our privacy policy in plain language.

## **2. COLLECTION OF YOUR PERSONAL INFORMATION**

According to the law, personal information is any information that relates to a natural person and allows that person to be identified, regardless of the medium on which it is held or the form in which it is accessible. Information about a company or partnership is not personal information.

Generally speaking, an individual's business or professional contact information does not constitute personal information. Similarly, this policy does not apply to personal information that is public information by law.

Consent to the collection, use and disclosure of personal information must be manifest, free and informed. Consent must be given for specific purposes. Given the nature and sensitivity of personal information, consent may be express or implied. Generally, we will obtain your consent at the time of collection, except in the cases and conditions provided for by law.

Consent must be collected clearly, without coercion, in an informed manner and for a specific purpose. It is given by a declaration or a clear positive act. This may take the form of checkboxes, pop-ups on the website or any other device enabling the user to consent to the use of this data for a specific time and purpose.

You may withdraw your consent at any time subject to legal restrictions and reasonable notice. Please note that if you choose to withdraw your consent, we may no longer be able to provide you with certain products or services.

We only collect personal information that is necessary for our business relationship with you.

The personal information collected may include information about your identity, address, e-mail address, financial information such as credit card information, information about products and services you may choose to purchase, and job search and recruitment information.

Additional personal information may be requested when registering for a specific service that requires this information:

- 1) By signing up for a newsletter or survey;
- 2) By participating in contests or draws;
- 3) By creating a user profile and choosing a corresponding password;
- 4) By contacting us directly via a network form available on a website;
- 5) When you purchase products from one of our websites for yourself, your family or your friends;
- 6) When you share your online application for a job offer or opportunity;
- 7) Ask for a discount coupon on a product or service;
- 8) Stay in touch with you and offer you personalized service.

As a general rule, we collect personal information from you. However, we may also collect personal information about you from third parties with your consent or without your consent if permitted by law, for example, to validate the information provided or if the third party is authorized to disclose personal information about you.

The use of our Web site also enables us to gather statistics, analyze traffic, and carry out communications, marketing and sales strategies. Like other Web sites, cookies are small data files that are transferred to your computer's hard drive when you browse a Web site. Most Web sites use cookies to improve customer service. You can easily block cookies. However, without cookies, you won't have access to certain Web site functions and won't be able to take full advantage of them.

### **3. USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION**

The personal information collected is used only for the purposes specified in this policy or indicated on our website.

We may disclose personal information to any member of our organization, including our affiliates, in connection with the application of this policy. Unauthorized access or disclosure of personal information by an employee is strictly prohibited and may result in disciplinary action up to and including dismissal. Similarly, we may share your personal information without your consent with our suppliers or other persons to the extent necessary for the performance of their services. In such cases, a confidentiality agreement will be signed with the person in question to confirm that confidentiality will be respected.

At no time do we request or transfer personal information to third parties, except as specified below.

We may transfer personal information to third parties outside our group of companies for processing, but prohibit such third parties from using or disclosing the personal information other than for the purposes specified in this policy and impose security safeguards appropriate to the sensitivity of the information.

We reserve the right to disclose your personal information as required by law, in connection with legal proceedings, in response to a request from a law enforcement authority and, if necessary, to protect duBreton's property, interests and rights.

If personal information is to be disclosed outside Quebec, we will ensure that it is used only for the purposes set out in this policy.

#### **4. SAFETY MEASURES**

We have implemented reasonable physical, electronic and administrative measures to protect personal information against accidental loss, unauthorized access or misuse. We use security protocols to protect sensitive information as it travels through the website. We take all reasonable precautions to ensure that personal information is protected.

#### **5. CONSERVATION**

We retain personal information only as long as necessary for the fulfillment of the purposes for which it is collected. In certain circumstances, personal information may be made anonymously and cannot be associated with you. We reserve the right to use anonymous and de-identified data for legitimate business purposes without informing you or obtaining your consent.

#### **6. REQUEST FOR ACCESS, WITHDRAWAL AND RECTIFICATION**

You have the right to request access to or correction of the information we hold about you. If you no longer wish to receive promotional information or modifications, you may also request their removal by following the instructions on the Web site. In all other cases, you must send your request to the Privacy Officer, whose address is 1312, rue Saint-Georges, Saint-Bernard (QC) G0S 2G0 or by e-mail: [prprp@dubreton.com](mailto:prprp@dubreton.com).

Similarly, if you have any questions or concerns about how we process or update your personal information, please contact us at the above address.

In all cases, the person responsible for protecting personal information will contact you within 30 days of receiving your e-mail.

#### **7. POLICY MODIFICATION**

The Privacy Policy may be amended from time to time to maintain compliance with the law. We recommend that our users check the policy from time to time for updates. If necessary, we may notify users by e-mail of changes to this policy by contacting the Privacy Officer.