

Privacy Compliance Policy - Law 25

Groupe Mayrand Alimentation | Ressources Humaines | Novembre 2023



TABLE OF CONTENTS

1.	Mayrand Group's commitment to personal information protection	. 3
2.	What is 'personal information'?	. 3
3.	Data protection officer (DPO)	. 3
4.	Consent	. 3
5.	How do we collect and process personal information?	. 3
6.	Access to your personal information	. 4
7.	Incidents and communication with the Commission d'accès à l'information ("CAI")	. 4
8.	Accuracy of personal information	. 5
9.	Automated decision-making	. 5
10.	Retention period	. 5
11.	Use of cookies and tracking technologies	. 5
12.	Informing individuals of technological collection	. 5
13.	Suspension of dissemination of personal information	. 5
14.	Who we disclose your personal information to and how	. 5

MAYRAND

1. Mayrand Group's commitment to personal information protection

This personal information protection policy (the "Policy") applies to Alimplus Inc. and Mayrand Food Service Group ("Mayrand Group"), as well as its divisions and subsidiaries, in accordance with Quebec Law 25 (the "Law").

Mayrand Group is committed to respecting and protecting the privacy of its website users, customers, suppliers, employees, and anyone who interacts with the Company.

We have taken, and will continue to take, measures to protect the personal information that we hold. This Policy provides details on:

- Why we collect personal information;
- What we do with this information;
- The measures we take to ensure access to this information is protected;
- Who to contact for questions or concerns about our policies or practices.

We reserve the right to modify the Policy at any time; however, changes or additions to the section regarding the purposes for which we use personal information will apply to you only if you consent to them (see Consent in section 4). You will be notified of any changes at the top of the Policy, where it will be indicated when the last update was made. We invite you to review the Policy to fully understand how the information you provide will be used or disclosed.

Minors: All personal information concerning a minor under the age of 14 is collected only with parental or guardian consent, except where it benefits the minor.

2. What is 'personal information'?

Personal information is defined as any information that makes it possible to identify a natural person. This information is confidential and, with certain exceptions, may not be communicated without the consent of the individual.

3. Data protection officer (DPO)

Mayrand Group has a data protection officer (DPO). If you have any questions about this policy or wish to report an incident, please email renseignementspersonnels@mayrand.ca.

4. Consent

Mayrand Group's consent process is as follows:

- Obtain separate valid consent for each specific purpose in clear and plain terms;
- Inform individuals when they are the subject of a decision based exclusively on automated processing;
- Inform individuals before using a technology that allows them to be identified, located or profiled, and of the means available to enable these functions.

5. How do we collect and process personal information?

Personal information is collected as follows:

- Directly from individuals;
- Through our service providers;



- Using cookies;
- Via tracking technologies.

Only the personal information necessary to provide the products and services to the individual is collected. The following personal information may be collected:

- Name and contact information, which may include email, home address and telephone number. For online purchases, IP addresses and, in some cases, payment card information, including the credit card number, expiration date and security code, may be collected.
- Credit application information, which may include if the company is a sole proprietorship, as well as the name, address, telephone number, email, banking information and driver's license number.
- Employment-related information, such as name, address, email and any other information provided in the CV, in initial discussions with a candidate, at the time of hiring and throughout the employee's tenure with the company.

6. Access to your personal information

Our customers have the right to consult any data that concerns them. Given the importance we place on the personal information of each of our customers, you may access your own data but not that of your spouse or other individuals. In certain circumstances, we may provide access to personal information we hold about others, but only to the extent required or permitted by law (e.g., a parent or guardian may, in some cases, be authorized to access the personal information of a child or an individual requiring decisions to be made on their behalf, in the event of death, if knowledge of the information would alleviate the grieving process, and if the deceased did not provide written notice of their refusal to grant access).

Our customers:

- Have the right to request access to their personal data, to which Mayrand Group will respond within one month;
- May request to correct inaccurate or incomplete personal data;
- May request the deletion of their personal data in circumstances of risk of significant harm;
- May request that computerized personal information be communicated in the form of a written and intelligible transcript;
- May object to the processing of their personal data for certain purposes;
- Have the right to make requests and lodge complaints concerning the management of personal information.

In very specific circumstances, we may be unable, for legal reasons, such as privileged communications between a professional and a client or pending legal proceedings, to provide you with personal data and health information. In each case, we will provide you with written reasons for refusing your access request.

7. Incidents and communication with the Commission d'accès à l'information ("CAI")

The CAI is informed of an incident in the following cases:

- Any incident involving a risk of significant harm (also communicated to the individuals)
- When verifying or confirming someone's identity using biometric characteristics or measurements



8. Accuracy of personal information

The Company is committed to keeping personal information accurate and up to date. To request a personal information modification, please email renseignementspersonnels@mayrand.ca.

9. Automated decision-making

Where decisions are taken solely by automated processes based on personal data, the Company is committed to informing individuals of the use of such automation. The latter have the right to contest automated decisions and request human intervention if necessary.

10. Retention period

Personal data is kept for the period necessary to achieve the purposes for which it was collected. The retention period may vary depending on the type of data and Mayrand Group's needs.

11. Use of cookies and tracking technologies

Cookies are used to collect information when individuals visit our website.

12. Informing individuals of technological collection

When personal information is collected by technological means, individuals are informed through notices or pop-ups on the organization's website.

13. Suspension of dissemination of personal information

Individuals affected by personal information may request that Mayrand Group stop disseminating such information or that it be removed or de-indexed from the database. This occurs when:

- The dissemination of this information breaches the law or a court order;
- The dissemination of the information may cause serious injury to the individual's reputation or privacy (injury that is clearly greater than the public interest in knowing the information or someone's right to self-expression);
- The requested removal, re-indexation or de-indexation is limited to what is necessary to prevent ongoing injury.

14. Who we disclose your personal information to and how

The personal information we hold about you may need to be transferred to third parties during our business. Any third party to whom personal information is transferred must ensure compliance with the following conditions as part of a prior agreement:

- Restricted access: Personal information may only be consulted by individuals who require it to perform their duties and who have signed a confidentiality agreement.
- Appropriate use: Personal information may only be used for the purposes specified in the detailed presentation of the research activities.

Personal information may not be disclosed, published or disseminated in such a way as to make it possible to identify individuals. No personal information collected from individuals will be disclosed to third parties, except in the following cases:

• Mayrand Group entities;

MAYRAND

- Service providers who perform certain services necessary for the operation of the company insofar as they require such personal information to perform their duties (service providers must comply with specific requirements regarding the protection of personal information);
- Third parties when the law requires or authorizes the communication of personal information.

Mayrand Group ensures that any transfer of personal information outside Quebec complies with the requirements of Law 25.