
PRIVACY AND PROTECTION OF PERSONAL INFORMATION POLICY

1. GENERAL INFORMATION

1.1. Introduction

Privacy is important to ADF Group Inc. (hereinafter "**Entity**", "**We**", "**Us**", "**Our**"). For this reason, We have implemented safeguards and sound management practices for your Personal Information in accordance with applicable laws in Quebec and Canada.

This privacy policy (the "**Policy**") describes our practices with respect to the collection, use, processing, disclosure and retention of Personal Information of our customers, visitors and users.

Your use of Our website <https://www.adfgroup.com/> (the "**Website**") or any of our Services, means that you agree that We may collect, use, process, disclose and retain your Personal Information in accordance with the terms described herein. If you do not agree to abide by and be bound by this Policy, you are not permitted to visit, access or use Our Website or Services, or share your Personal Information with Us.

This Policy does not apply to the Personal Information of the Entity's employees, representatives and consultants, or to any other person affiliated with the Entity, as well as to any information that does not constitute Personal Information as defined by the laws applicable in Quebec and Canada.

1.2. Privacy Officer

Questions, comments or complaints regarding the Entity's Privacy Policy and practices may be directed to our Privacy Officer at:

Phone : 450-965-0131, poste 2912
Email : patrik.gamache@adfgroup.com
Address : 300 Henry-Bessemer, Terrebonne, Quebec, Canada J6Y 1T3

2. DEFINITIONS

The following words and phrases, when they appear with the first letter in capital letters in this Policy, shall have the meanings ascribed to them below, unless otherwise implied or explicitly stated in the text:

- "**Service Provider**" means any natural or legal person who processes Personal Information on behalf of the Entity. These are third-party companies or individuals retained by the Entity to facilitate the Services, provide the Services on behalf of the Entity, perform services related to the Services, or assist the Entity in analyzing the use of the Services.
- "**Personal information**" means any information that relates to a natural person and allows that person to be identified, e.g.. that directly or indirectly reveals something about the identity, characteristics (e.g., skills, preferences, psychological tendencies, predispositions, mental capacities, character and behaviour of the person concerned) or that person's activities, regardless of the nature of the medium and whatever form in which the information is accessible (written, graphic, audio, visual, computerized or otherwise).
- "**Privacy Officer**" means the person who is responsible for the application of this Policy and whose contact information is identified in section 1 of this Policy.
- "**Services**": Services refers to Our Website and social media pages.

3. HANDLING OF PERSONAL INFORMATION

3.1. Collection of Personal Information

In the course of Our business, We may process different types of Personal Information including the following information:

- contact information, such as your first name and surname, address, email address and telephone number;
- the information you choose to provide or share with Us, for example, when you complete a form, apply for a job, answer surveys or contact one of Our staff members or representatives;
- information automatically collected when you use Our Website and Services, including:
 - login information and other information about your activities on Our Website, such as your IP address, the pages you have visited, the time and date of your visits, the number of connections, the type of browser you are using, your device's operating system and other hardware and software information, etc.;
 - Demographic and geolocation data, such as your IP address, a precise or approximate location determined from your IP address, or your mobile device's GPS (depending on your device settings).

In each case, Personal information is processed in accordance with legal and necessary purposes listed in section 3.2 below.

3.2. Use of Personal Information

We may use your Personal information for the following legitimate purposes:

- operate, maintain, supervise, develop, improve and offer all features of Our Website;
- present and/or provide Services to you;
- developing, improving, and offering new Services;
- send you messages, updates, security alerts;
- for marketing and business development purposes, if you have previously consented to the processing of your Personal Information for such purposes;
- respond to your questions and provide you with assistance as needed;
- collect reviews and feedback in connection with our Services;
- detect and prevent fraud, errors, spam, abuse, security incidents, and other harmful activities;
- provide you with communications as required by law;
- for any other purpose permitted or required by law.

3.3. Disclosure of Personal Information

We may share your Personal information to our employees (namely the Sales and Estimating Department), contractors, consultants, agents, Service providers, and other trusted third parties (collectively, "**Service Providers**"), who need the information to assist Us in operating Our Website, conducting our business activities or providing you services, provided that such Service Providers have prior written commitments to ensure the privacy of your Personal Information in accordance with applicable laws and Our information governance program.

We do not sell, trade, or otherwise share your Personal Information to third parties.

3.3.1. Service Providers and Other Third Parties

Although We try to avoid sharing your Personal Information with third parties, We may use Service Providers to perform various services on Our behalf, such as IT management and security, marketing, and data analytics, hosting, and storage. We have defined below the cases in which such sharing may take place:

We use:

- *Google Analytics* to analyse the Website's audience, compile statistics and talk with customers and prospects. Read their [privacy policy](#) ;
- the services of *Jobilico* and *Indeed* to recruit our employees. Read their respective privacy policies;
- the *Meta Group's Facebook* and *Instagram* social media services to communicate about our Services and products. Review Meta's privacy policy;
- the services of the social network *LinkedIn* to communicate about our Services and products. Review their privacy policy;
- *YouTube* to showcase our products and Services. Read Google Privacy Policy;
- *Futé Marketing's* services for the hosting of Our Website;
- *Metatracer* to ensure Our compliance with the privacy laws that apply to Us. Review their privacy policy.

Before disclosing your Personal Information with Service Providers outside the province of Quebec or depending on the nature of the Personal Information disclosed, We conduct a privacy impact assessment. When We disclose your Personal Information to Service Providers, We enter into written contracts with them before your Personal Information is disclosed to them and provide them with only the Personal Information necessary to carry out their mandate. As part of these contracts with our Service Providers, We are committed to adhering to the principles set out in this Policy, and these Service Providers are required to use Personal Information confidentially, as directed by Us, and only for the purposes for which it was provided. We provide sufficient assurances that adequate safeguards are in place that are commensurate with the sensitivity of the Personal Information processed or shared. When our Service Providers no longer need your Personal Information, We require them to destroy that data appropriately.

3.3.2. **Complying with Legislation, Answer Legal Requests, Preventing Harm, and Protecting Our Rights**

We may disclose your Personal Information where We believe such disclosure is authorized, necessary or appropriate, including:

- to respond to requests from public and government authorities, including public and government authorities outside your country of residence;
- to protect Our business;
- to comply with legal process;
- to protect Our rights, privacy, safety, property, yours or those of others;
- to allow Us to pursue available recourses or limit the damages We may sustain; and
- in accordance with applicable laws in force, including laws outside your country of residence.

3.3.3. **Business Transaction**

We may share, transfer or disclose, in strict accordance with this Policy and the provisions of the *Act respecting the protection of personal information in the private sector*, CQLR c P-39.1 (the "**Private Sector Act**") and *the Act to modernize legislative provisions as regards the protection of personal information*, S.Q. 2021, c 25 (the "**Bill 25**") (passed on September 22, 2021), your Personal Information in the event of a sale, transfer or assignment, in whole or in part, of the Entity or Our assets (e.g., as a result of a merger, consolidation, change of control, reorganization, bankruptcy, liquidation or other business transaction, including in connection with the negotiation of such transactions). In this case, We will notify you before your Personal Information is transferred and is governed by a different privacy policy.

3.4. **Consent to Personal Information**

As far as possible, the Entity will directly obtain consent from the individual to collect, use and disclose their personal information. However, if you provide Us with other individuals' Personal information, you must ensure that you have given them due notice that you are providing Us their information in addition to obtaining their consent to such disclosure.

We will obtain your express, manifest, free, and informed consent given for specific purposes before using or disclosing your Personal Information for purposes other than those set out herein. We will also seek your explicit consent whenever sensitive Personal Information is concerned in any of the Entity's processing activities. We will ask for your consent for each of the specific purposes in plain and clear terms, distinct from any other information that will be disclosed to you.

BY USING OUR WEBSITE, BY SUBMITTING YOUR PERSONAL INFORMATION BY EMAIL, YOU CONSENT TO THIS PRIVACY POLICY AND TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE PRIVACY POLICY.

If you do not consent, please stop using Our Website. Except where otherwise required by law, you may withdraw your consent at any time upon reasonable notice. Please note that if you choose to withdraw your consent to the collection, use or disclosure of your Personal Information, certain features of Our Website may no longer be available to you or We may not be able to offer you some of our services.

3.5. **Retention of Personal Information**

Subject to applicable laws, We retain your Personal Information only for as long as necessary to fulfill the purposes for which it was collected, unless you consent to your Personal Information being used or processed for another purpose. For information purposes only, the duration of certain information may extend up to seven (7) years following the end of the Services rendered to you by the Entity. In addition, Our retention periods may be changed on a timely basis due to legitimate interests (e.g., to ensure the security of Personal Information, to prevent abuse and breaches, or to prosecute criminals).

For more information regarding periods for which your Personal Information is retained, please contact Our Privacy Officer using the contact information provided in Section 1.1 of this Policy.

4. YOUR RIGHTS

As the person concerned, you may exercise the rights set out below by contacting Our Privacy Officer in writing at the contact information provided in Section 1.1 of this Policy. Please note that We may ask you to verify your identity before answering any of these requests.

You have the right to:

- be informed of the Personal information We hold about you, its use, disclosure, retention and destruction, subject to the exceptions provided by applicable law;
- access your Personal information, request a copy, including hard copy copies of the documents containing your Personal information, subject to exceptions provided by applicable law and obtain, where appropriate, additional information on how We use, disclose, retain and destroy it;
- ask that We correct, modify and update the Personal information We have about you, if it is incomplete ambiguous, out of date or inaccurate;
- withdraw or modify your consent for the Entity to collect, use, disclose or retain your Personal information at any time, subject to applicable legal and contractual restrictions;
- ask Us to stop disseminating your Personal information and to de-index any link to your name that provides access to that information if such disclosure would contravene the law or a court order;
- request that your Personal information be disclosed to you or transferred to another organization in a structured and commonly used technological format;
- to be notified of a privacy incident involving your Personal information that may cause you serious harm. To this end, we keep a register of all privacy incidents and assess the harm they may cause;
- to file a complaint with the *Commission d'accès à l'information*, subject to the conditions set out in applicable law.

In order to comply with your request, you may be asked to provide appropriate identification or otherwise identify yourself.

5. COOKIES AND OTHER TRACKING TECHNOLOGIES

We use cookies and other similar tracking technologies (collectively "**Cookies**") to help Us operate, protect and optimize Our Website and the Services We offer. "Cookies" are small text files that are stored on your device or browser. They collect certain information when you visit Our Website, including your language preference, browser type and version, the type of device you are using, and your device's unique identifier. If some of the "Cookies" we use are deleted after your browser session has ended, other cookies are stored on your device or browser in order to allow us to recognise your browser the next time you visit Our Website. The Personal Information collected through these "Cookies" is not intended to identify you. In particular, they make it possible to ensure the functioning of Our Website, to improve the browsing experience of users and to provide certain data that allows Us to better understand the traffic and interactions that take place on Our Website as well as to detect certain types of fraud. « Cookies » do not cause any damage to your device and cannot be used to extract Personal information. We collect your IP address, data related to your device and operating or browsing system, your browsing history on Our Website as well as your queries, your browsing preferences (languages used), etc. You may set your browser so that you are informed of the setting of "Cookies" when you visit Our Website, so that you can decide, in each case, to accept or refuse the use of some or all of the "Cookies". Please note that disabling "Cookies" on your browser may adversely affect your browsing experience on Our Website and prevent you from using some of its features.

6. SECURITY MEASURES

The Entity has implemented physical technological and organizational security measures aiming to adequately protect the privacy and security of your Personal information against the loss, theft or any unauthorized access, disclosure, copying, sharing, use, modification. These measures include, but are not limited to:

On the administrative side, the adoption of a series of policies and procedures as part of the implementation of Our information governance program, including:

- govern the access, communication, retention, de-identification, including anonymization and/or, where applicable, destruction of Personal information;
- determine the roles and responsibilities of our employees during the life cycle of Personal information and records;
- establish response procedures, and response in case of confidentiality incidents;
- govern the process of queries and complaints relating to the protection and handling of Personal information.

On the technical side, recourse to several measures, such as:

- the use of a secure server. All sensitive or credit data provided is transmitted via Secure Socket Layer (SSL)" technology and then encrypted in Our payment gateway provider database only for access by authorized persons with special access rights to such systems, and are required to keep the information confidential;
- the use of backup systems, network monitoring software, etc.;
- the use of encryption and separation of tasks, access controls and internal audits.

We have not exhaustively listed the set of measures we are putting in place given the public nature of this Policy.

Despite the measures hereinabove listed, we cannot guarantee the absolute security of your Personal information. If you have reason to believe that your Personal information is not longer protected, please immediately contact our Privacy Officer using the contact information provided in Section 1.1 of this Policy.

7. CHANGES TO THE PRESENT PRIVACY POLICY

We reserve the right to modify the present Policy at any time in accordance with the applicable law. If We make any changes, We will publish the revised Privacy Policy and the update date in the footer of the Privacy Policy. We will also inform you by email at least 30 days prior to the effective date of the revised version of Our Policy.

If you do not agree the new terms of the Privacy Policy, please do not use Our Website and Services. If you continue using Our Website or Services pursuant new version of Our Policy comes into effect, your use of Our Website and Services will then be govern by this new version of the Policy.

8. LINKS TO THIRD PARTY WEBSITES

From time to time that We may include on Our Website references or links to our Facebook page, third-party websites, products, or services ("**Third-Party Services**"). These Third-Party Services, which are not operated nor controlled by the Entity, are govern by privacy policies that are entirely separate and independent from ours. We therefore assume no responsibility for the content and activities of these sites. This Policy applies only to Our Website and the Services We offer. The Policy does not extend to Third-Party Services such as our Facebook and YouTube pages.

9. INVISIBLE RECAPTCHA

The invisible reCAPTCHA analyzes activity on a web page function (e.g., mouse movements and typing patterns) to determine if a user is a robot.

The invisible reCAPTCHA service may collect information from your device. The information collected by the reCAPTCHA is kept in accordance with its Privacy Policy.

10. INFORMATION ABOUT YOUR PRIVACY RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)

For the purposes of this Privacy Policy, We act as the controller of your Personal information. If you are from the European Economic Area (EEA), Our legal basis for collecting and using your Personal information, as described in this Privacy Policy, depends on the information We collect and the specific context in which We collect it. We may process your Personal information because:

- We need to conclude a contract with you, like when you are using Our Services;
- You have granted Us permission to do so;
- The processing is in Our legitimate interests and does not supersede your rights;
- To comply with the law.

If you reside in the EEA, you have certain rights to protect your Personal information. Under certain circumstances, you have the following protection rights:

- The right to access, update or delete the Personal Information We have about you;
- The right to correction;
- The right to objection;
- The right to restriction;
- The right to transferability;
- The right to withdraw your consent from the data.

Please note that We may ask you to verify your identity before answering to such requests.

You have the right to file a complaint with the Privacy Authority about Our collection and use of your Personal information. For more information, please contact your local data protection authority in the EEA.

11. INDIVIDUALS UNDER THE AGE OF 14

We do not knowingly collect and use Personal information from anyone under the age of 14. If you are under the age of 14, you should not provide Us with your Personal information without the consent of your parent or guardian. If you are a parent or guardian and you become aware that your child under the age of 14 has provided Personal information to Us without consent, please contact Us using the contact information provided in Section 1.1 of this Policy to request that We delete that child's Personal information from Our systems.

12. APPLICABLE LAWS

The laws in Canada and the Province of Quebec, excluding its conflict of law rules, will govern this Policy and your use of Our Website. Your use of Our Website may also be subject to other local, provincial, national or international laws.

On behalf of ADF Group Inc. Senior Management,

Chief Financial Officer

/ Signed /

Jean-François Boursier, CPA