



GROUPE NUTRI

PRIVACY POLICY

JANUARY 2024

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*The use of the masculine gender includes the feminine, and the singular includes the plural and vice versa.
This presentation is intended to make the text easier to read.*

I. POLICY OBJECTIVES

This policy applies to Groupe Nutri Inc. and its business units, hereinafter referred to as **Groupe Nutri**.

In the course of our activities, we may collect, process and use various types of personal information. This privacy policy describes our practices and the means we use to protect the confidentiality of personal information collected through a technological means, including a website, application or connected objects. By browsing our site, you acknowledge and accept these terms of use.

We recognize the importance of respecting your privacy and protecting the personal information we hold. We take all necessary measures to comply with all requirements of Quebec's *Act Respecting the Protection of Personal Information in the Private Sector* and any other applicable legislation.

II. PERSONAL INFORMATION

Personal information is information about a natural person that directly or indirectly allows that person to be identified. This may include, for example, your name, e-mail address, contact information and any similar information provided to Groupe Nutri. Such information is confidential. With certain exceptions, it may not be disclosed without your consent.

Collection of personal information

We collect only the personal information required to perform our duties and provide our services.

Sources of personal information

We collect personal information about you from :

You: in the following circumstances:

- When you provide us with this information directly, for example via a contact form or an order form;

- When you visit our Web site or participate in a contest, promotion or survey, we may also ask you to voluntarily provide us with certain personal information (such as your name, e-mail address, mailing address and telephone number) so that we can more easily communicate with you and offer you the services you require;
- When personal information about you is automatically collected as part of your use of our services or website. This includes the following data: IP address, location, hardware and software details as well as the content, links and pages the user visits on our website;
- In addition, when a user completes an online application for a position posted on the Career page of our website, the user will be asked to provide the following additional personal information:
 - A curriculum vitae (which may include mailing address, work experience, education and other personal information), and;
 - A cover letter (which may include mailing address, work experience, education, diplomas, personal interests, opinions and other personal information).

Third parties: when they provide us with personal information about you. Third parties who share your personal information with us include:

- Service providers. For example, we may use service providers to analyze how you interact and engage with our website or services, or third parties may help us provide you with customer support.

Use of personal information

Groupe Nutri uses personal information only for the purposes for which it was collected and provided.

Groupe Nutri only collects or uses personal information about its users that is necessary for :

1. To adapt the information, activities, services and products available to users and to manage their quality, in particular by taking into account the opinions written by users, and to measure the demographic variables and interests of users in relation to specific Groupe Nutri activities or services;
2. Recruit new employees via the Careers page of our website;
3. To inform users of news, updates and offers concerning our activities and products insofar as the user has consented to such communications and in accordance with the law;
4. Provide quality customer service and support (for example, when a user asks a question via the "Contact Us" page, Nutri Group may record the question and the answer given to the user for internal quality control purposes);
5. Communicate with a user about Groupe Nutri's activities and products;
6. Operate, maintain, supervise, develop, improve and offer all the functionalities of our website;
7. Develop new services or products or improve our services and products;
8. For marketing and business development purposes, if you have previously consented to the processing of your personal information for these purposes;
9. Administer a contest, promotion, survey or other feature of the website or our services and products;
10. Gather opinions and comments on our services and products;
11. Conduct research and analysis related to our company, services and products;
12. Detect and prevent fraud, errors, spam, abuse, security incidents and other harmful activities;
13. Cooperate in the investigation of a breach of the law or to protect or defend a legal interest;
14. Comply with a court order, subpoena or investigation by competent authorities;
15. Exercise its rights and remedies under any contract or other obligation binding it to a user; and
16. Where permitted or required by applicable law.

Non-Disclosure to Third Parties

Groupe Nutri will not disclose your personal information to third parties unless required to do so by a legal obligation or court order, or in the performance of a contract with a third party. When we retain the services of an outside supplier, we use all appropriate means to ensure that your personal information is protected in accordance with the law and is collected, used, stored and destroyed in a manner consistent with this policy.

Groupe Nutri does not rent, sell or trade personal information without your consent.

Retention and destruction of personal information

Groupe Nutri is committed to ensuring that the personal information we hold is up to date and accurate at the time we use it to make a decision about the individual concerned.

Groupe Nutri undertakes to take appropriate security measures to ensure the protection of personal information that is collected, used, disclosed, retained or destroyed, taking into account, in particular, the sensitivity of the information, the purpose for which it is used, its quantity, distribution and medium.

Once the purposes for which the personal information was collected have been fulfilled, the information is destroyed or made anonymous, subject to Groupe Nutri's retention policies and the law. However, Groupe Nutri reserves the right to retain, for a reasonable period of time, certain personal information in order to comply with the law, prevent fraud, collect its debts, resolve a claim or other related problems, or cooperate in an investigation.

Data security

Only those members of our staff who have a need to access and process your personal information will have access to it, in accordance with our policy governing the governance of personal information.

We have also implemented a cybersecurity policy and training program.

We use state-of-the-art security systems in the design, implementation and day-to-day operation of the website and our underlying servers and networks. We continue our efforts to detect and block intrusions on or to our website. We have put in place various means to ensure that your personal information is protected against loss and theft, as well as unauthorized access, disclosure, copying, use, modification or destruction.

However, no security measure is absolute or fully guaranteed. If you have reason to believe that your interaction with Groupe Nutri is no longer secure, or if you believe that the security of any information you have provided has been compromised, please contact us immediately at (Mr. Yannick Bonin, ybonin@nutrigroupe.ca).

Access to Your Personal Information and Right of Rectification

By law, you may request access to your personal information and obtain a copy. In addition, if your personal information is inaccurate, incomplete or equivocal, or if its collection, communication or retention is not authorized by law, you may request that it be corrected.

You also have the following rights:

- Withdraw your consent to the disclosure or use of personal information collected at any time;
- Request the erasure, destruction or removal of personal information in certain circumstances. There are certain exceptions under which Groupe Nutri may refuse a request for erasure or destruction, including where personal information is required to comply with the law or with a contractual agreement between the parties, or in connection with claims;
- Request that the processing of certain personal information be suspended, in particular in order to establish its accuracy or the reason for its processing;
- Request the transfer of certain personal information to another party.

Requests for access, rectification or any question relating to this policy should be addressed in writing to Mr. Sébastien Mercier, Privacy Officer, and sent by e-mail or regular mail to the following address:

6655, rue Picard, Saint-Hyacinthe, QC, J2S 1H3
smercier@nutrigroupe.ca

Cookies

Cookies may be used to facilitate and optimize your browsing on our website. They are downloaded and stored in the memory of the device you use to view web pages.

Most web browsers accept cookies by default. You can change your browser's privacy settings at any time to block cookies or delete those already stored. This will not prevent you from accessing the website, but may affect its performance.

Statistics

Groupe Nutri may use analytical tools to collect, analyze, measure and report data about visits to the site in order to understand and optimize web usage.

Groupe Nutri retains this type of information for accounting purposes, among others:

- Number of visitors;
- Most visited pages;
- The technology used by customers;
- Referral sites;
- Users' country of origin.

Links to other sites

Groupe Nutri's website may contain hyperlinks to websites owned and operated by third parties. Groupe Nutri makes these hyperlinks available to users of its website for convenience and exercises no form of control over the content of these sites.

When you follow these hyperlinks, you leave Groupe Nutri's site and the information exchanged is no longer subject to Groupe Nutri's privacy policy, but to that of the site visited. Groupe Nutri makes no representation or endorsement regarding, and accepts no responsibility for, the content or use of such sites. The information presented on these sites may not be available in English or French.

Minor

Nothing on Groupe Nutri's website specifically solicits information from minors or seeks to determine whether the visitor is a minor. Personal information submitted to the website by minors is treated in the same way as that submitted by adults.

Groupe Nutri firmly believes that parental supervision is an important factor in the use of the Web by minors. Therefore, we ask parents to guide their children when they are asked to provide personal information online. We also ask minors to obtain their parents' permission before providing any information online.

Changes to This Privacy Policy

We reserve the right to modify this policy at any time in accordance with applicable law. In the event of a change, we will post the revised Privacy Policy and update the update date in the footer of the Privacy Policy. If you do not agree to the new terms of the Privacy Policy, please do not continue to use our website and services. If you choose to continue using our website or services after the new version of our policy becomes effective, your use of our website and services will be governed by the new version of the policy.

Handling privacy complaints

Any person who considers that his or her personal information has been handled inappropriately, or who believes that the law has not been respected in his or her regard, may file a complaint.

Complaints may relate to the collection, retention, use, disclosure or destruction of personal information.

Complaints are treated in the strictest confidence. Personal information is protected and accessible only to those authorized to consult it in the performance of their duties.

Complaints must be made in writing to the Privacy Officer, using the contact information provided in the "Access to your personal information and right of rectification" section.

Complaints can also be made to the Commission d'accès à l'information du Québec: <https://www.cai.gouv.qc.ca/>

Confidentiality incidents

We undertake to inform any person concerned of a confidentiality incident involving personal information held by us and presenting a risk of serious harm.

By "privacy incident" we mean:

- Unauthorized access to personal information;
- Unauthorized use of personal information;
- Unauthorized disclosure of personal information;
- The loss of personal information or any other breach in the protection of such information.

In the event of a privacy incident involving the security of your personal information that presents a risk of serious harm, you will be notified of the breach as soon as possible and Groupe Nutri will take the necessary steps to preserve the confidentiality and security of your personal information. Groupe Nutri may also notify any person or organization likely to reduce this risk, by communicating only the personal information necessary for this purpose.

Notwithstanding the foregoing, a person whose personal information is affected by the incident need not be notified to the extent that to do so would be likely to impede an investigation by a person or body who, by law, is responsible for preventing, detecting or repressing crime or offences against the law.

Limitation of liability

Groupe Nutri is committed to taking all reasonable measures to ensure the confidentiality and security of personal information in accordance with technological standards appropriate to our industry.

Notwithstanding the foregoing, you declare that you understand and acknowledge that no computer system offers absolute security and that there is always some degree of risk involved in transmitting personal information over the public network that is the Internet.

You agree that Groupe Nutri cannot be held responsible for any breach of confidentiality, hacking, virus, loss, theft, misuse or alteration of personal information transmitted or hosted on its systems or those of a third party. You also waive any claim in this regard, except in the case of gross negligence or wilful misconduct on the part of Groupe Nutri. Accordingly, you agree to release Groupe Nutri and its officers, directors, affiliates and business partners from any liability for any damages of any kind, whether direct or indirect, incidental, special or consequential in connection with the use of your personal information.

III. POLICY ADMINISTRATION

Responsible body :	Board of Directors
Responsible for policy application :	Vice President, Human Resources
Approval date :	January 2024
Revision date :	n/a
Effective date of policy :	January 2024
Frequency of policy updates :	This policy is revised at the request of the Vice President, Human Resources or as needed.