



GROUPE NUTRI

**GOVERNANCE AND MANAGEMENT POLICY
PERSONAL INFORMATION**

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. PRINCIPLES AND RULES

Purpose of the policy

The protection of personal information is a priority for Groupe Nutri Inc. and its business units, hereinafter referred to as **Groupe Nutri**.

This policy for the governance and management of personal information (the Policy) sets out the governance framework for the management of personal information.

It sets out the rules that guide Groupe Nutri's practices in managing the personal information it holds. It defines the roles and responsibilities of personnel with respect to personal information throughout its life cycle, from collection to destruction.

Scope of application

The Policy applies to all Groupe Nutri employees, including students, interns and contract workers.

It applies to all personal information held by Groupe Nutri, including that held by a third party, regardless of the medium on which it is stored, from its collection to its destruction. Any information that relates to a natural person and allows that person to be identified directly or indirectly is personal information.

It also applies to any person to whom Groupe Nutri entrusts personal information in the performance of a mandate or service contract.

Legislative, regulatory and administrative framework

This policy is based on the following texts:

- *Act respecting the protection of personal information in the private sector* (RLRQ, c. P-39.1);
- *An Act to establish a legal framework for information technology* (RLRQ, c. C-1.1);
- *The Civil Code of Quebec*.

Guiding principles

In the course of its activities, Groupe Nutri collects and processes personal information. Groupe Nutri is subject to the *Act respecting the protection of personal information in the private sector* and must protect the personal information it holds. To this end, Groupe Nutri is committed to taking appropriate measures to ensure the protection of personal information. Our personal information protection practises are based on the following principles:

Responsibility :

Groupe Nutri is responsible for the personal information held. To this end, Groupe Nutri :

- Implements policies and practices to meet its privacy obligations;
- Evaluates the impact on privacy of a project to acquire, develop or redesign an information system or electronic service delivery system involving personal information, right from the earliest design stages;
- Regularly raises awareness and provides its staff with training on the protection of personal information. These activities take a variety of forms, depending on the context and the desired objective: induction training for new employees, refresher training and various awareness-raising activities in the form of presentations, webinars, information capsules, newsletters, workshops and team meetings, etc.

It has set up a procedure for handling complaints relating to the management of the personal information it holds.

Necessity :

Groupe Nutri only collects personal information that is necessary for the performance of its duties or the implementation of programs for which it is responsible. Groupe Nutri employees only have access to the personal information they need to perform their duties.

Consent :

Whenever required by law, Groupe Nutri ensures that it obtains valid consent from the person to whom the personal information relates, for example, to use the information for a purpose other than that for which it was collected or to communicate it to third parties. Valid consent is manifest, free, informed and given for specific purposes. It is requested for each of these purposes in simple, clear terms, enabling the person concerned to understand the scope of what is being asked of him or her. In the case of sensitive information, consent must be given expressly.

Privacy policy :

Groupe Nutri ensures the confidentiality of personal information held. Groupe Nutri takes the necessary security measures to protect personal information, from its collection to its destruction. These measures take into account the sensitivity, purpose, amount, distribution and medium of the personal information. It implements the necessary measures to limit the use and disclosure of such information.

Accuracy :

Groupe Nutri ensures that personal information held is up to date, accurate and complete for the purposes for which it is collected.

Right of access and rectification :

Any person may ask to consult or obtain a copy of the personal information Groupe Nutri holds about him or her and have it corrected, to the extent provided by law.

Destruction :

Groupe Nutri destroys the personal information it holds once the purposes have been fulfilled.

Transparency :

Groupe Nutri is transparent in its management of personal information. At the time of collection, it informs the person concerned of the purposes of the collection, the use that will be made of the information and several other elements required by law. In the event of collection by technological means, this information is included in the privacy policy posted on our Web site. Groupe Nutri also publishes its privacy governance rules.

Treatment of personal information

Personal information is protected throughout its life cycle. Personal information held by Groupe Nutri is confidential and subject to the protection provided by law.

However, the following personal information is public information and is accessible to anyone who requests it:

- The name, title, address, e-mail address and telephone number of the place of work of a person performing functions within Groupe Nutri.

Collection of personal information

Groupe Nutri employees only collect personal information that is necessary for the purposes identified at the time of collection.

Human resources management

For the purposes of hiring personnel, Nutri Group's human resources staff collects only the personal information required to process the evaluation of applications. This information is generally provided by applicants.

The human resources staff collects the information needed to manage Groupe Nutri's personnel files, including :

- Employment information;
- Contact details;
- His diligence;
- Events related to training and professional development, occupational health and safety, performance and compensation.

Handling privacy complaints

The Privacy Officer collects personal information from complainants in order to process their complaint about the protection afforded to their personal information by Nutri Group. This information generally includes contact information, the subject of the complaint, etc.

Retention of personal information

Groupe Nutri employees ensure the confidentiality of personal information in the performance of their duties.

To do this, he :

- Complies with Groupe Nutri's policies, directives and procedures regarding the protection of personal information;
- Do not reveal any personal information that has come to your knowledge in the performance of your duties without your authorization;
- Participates in training and awareness activities offered by Groupe Nutri;
- Accesses only the personal information required to perform its duties;
- Ensures that the personal information it uses is complete, up-to-date and accurate for the purposes for which Groupe Nutri collects or uses it;
- Does not retain, on a physical, paper or electronic medium other than that of Groupe Nutri, any personal information brought to its knowledge in the course of its duties and continues to maintain its confidentiality.

In the event of doubt as to the confidentiality of any information, or if you have any questions about the management of personal information, please contact your immediate superior or the person responsible for the protection of personal information.

Use of personal information

Groupe Nutri employees use personal information only for the purposes for which it was collected. Any other use must be authorized in advance by the immediate superior or the person responsible for the protection of personal information. The

latter ensures that the new use complies with the law (authorized by law or requires the consent of the person concerned).

Groupe Nutri employees who use personal information in the course of their duties must :

- Limit the use they make of it to the performance of their duties;
- Ensure confidentiality in all circumstances;
- Immediately inform their immediate supervisor and the Privacy Officer of any situation where the confidentiality of personal information may have been compromised.

Disclosure of personal information

Groupe Nutri personnel may not communicate confidential personal information to a third party without the consent of the person concerned. The law provides for certain exceptions. In particular, Groupe Nutri may communicate such information without the consent of the person concerned:

- To his attorney;
- To the Director of Criminal and Penal Prosecutions if the information is required for prosecution of an offence under a law applicable in Quebec;
- To a person or body responsible under the law for preventing, detecting or repressing crime or infringements of the law, who requires it in the performance of his or her duties, if the information is necessary for the prosecution of an offence under a law applicable in Québec;
- To a person to whom it is necessary to communicate the information within the framework of a law applicable in Quebec or for the application of a collective agreement;
- To a public body within the meaning of the *Act respecting access to documents held by public bodies and the protection of personal information* (RLRQ, c. A-2.1) which, through a representative, collects it in the exercise of its powers or the implementation of a program under its management;
- To a person or body with the power to compel disclosure who requires it in the course of his or her duties;
- To a person to whom this communication must be made because of an emergency situation endangering the life, health or safety of the person concerned;
- To prevent an act of violence, including suicide, when there is reasonable cause to believe that there is a serious risk of death or serious injury to an identifiable person or group of persons, and the nature of the threat inspires a sense of urgency;
- To an archive;
- To a third party to enable the exercise of a mandate or the performance of a service contract;

- To a third party for the conclusion of a commercial transaction in which Groupe Nutri intends to participate;
- To a person who can use this information for study, research or statistical purposes;
- To a person who, by law, may collect debts on behalf of others and who requires it for this purpose in the performance of his or her duties;
- To an individual if the information is required to collect a debt owed by the company;
- In the event of a confidentiality incident, to notify a person or organization likely to reduce the risk of serious harm. The *Confidentiality Incident Management Procedure* applies.

Before communicating confidential personal information to a third party, Groupe Nutri employees must consult their immediate superior. Staff may consult with the Privacy Officer as required.

Destruction of personal information

Groupe Nutri staff securely destroys personal information once the purpose for which it was collected has been fulfilled.

Rights of the person concerned by personal information

How to find us :

The persons concerned by the personal information held by Groupe Nutri have the right to be informed of the existence of this information concerning them and to receive communication of it, within the limits and under the conditions provided for by law.

Portability :

An individual may request access to his or her computerized personal information provided directly to Groupe Nutri in a structured and commonly used technological format. This does not include personal information collected in paper format.

Correction:

An individual whose personal information is inaccurate, incomplete or equivocal, or whose collection, communication or retention is not authorized by law, may request that the information be corrected, within the limits and under the conditions provided by law.

Requests for access or rectification :

Any request for access or rectification of personal information must be addressed in writing to the person responsible for the protection of personal information, Mr. Sébastien Mercier, by mail or e-mail at the following coordinates:

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

A request for access or rectification received by any person other than the Privacy Officer must be forwarded to the Privacy Officer as soon as it is received.

II. ROLES AND RESPONSIBILITIES

The Board of Directors:

- Ensures that Groupe Nutri complies with and implements the provisions of the Act respecting the protection of personal information in the private sector;
- Facilitates the performance of the duties of the Privacy Officer;
- Adopts the present policy and the means of its application;
- Supports the implementation and dissemination of this policy.

The person responsible for the protection of personal information:

- Approves the present policy;
- Ensures compliance and implementation of legal provisions within Groupe Nutri;
- Ensures compliance with this policy and with legal, regulatory and administrative obligations relating to the protection of personal information;
- Coordinates Groupe Nutri's actions to protect personal information;
- Supports managers and provides advice, support and guidance to Groupe Nutri staff;
- Submits this policy to the Board of Directors for approval, and ensures that it is periodically updated;
- Propose the tools needed to implement this policy;
- Collaborates with managers responsible for IT security and document management in implementing measures to optimize the protection of personal information;
- Ensures privacy accountability;
- Handles privacy complaints in accordance with the law and records as required by law;
- Process access and rectification requests in accordance with the law;

- Conducts privacy impact assessments of all information system acquisition, development, redesign or electronic service delivery projects involving the collection, use, disclosure, retention or destruction of personal information, at the project's inception;
- Conducts privacy impact assessments for all disclosures of personal information outside Quebec and determines whether the disclosure is adequately protected.

Managers:

Managers are the holders of personal information under their responsibility. As such, they are responsible for the management and protection of personal information held by personnel under their responsibility. More specifically, they :

- Ensure compliance with this policy and related procedures or directives by personnel under their responsibility;
- Ensure that personnel under their responsibility use secure means to collect, use, retain, communicate or destroy personal information;
- Collaborate with the Privacy Officer to ensure Groupe Nutri's compliance with legislative, regulatory and administrative obligations regarding the protection of personal information;
- Take appropriate action in the event of a breach of this policy or of the rules governing the protection of personal information by a member of staff under their responsibility;
- Educate staff under their responsibility about the importance of protecting personal information, in collaboration with the Privacy Officer;
- Ensure that employees under their responsibility participate in privacy training offered by Groupe Nutri;
- Include contractual requirements for the protection and confidentiality of personal information when contracts involve the disclosure of such information. These clauses govern the collection, use, retention, communication and destruction of personal information by our suppliers and service providers;
- Ensure the security of information resources and the information they hold or use in accordance with Groupe Nutri policies and directives.

Groupe Nutri staff:

- Acknowledges this policy and respects its spirit, provisions and procedures;
- Takes the necessary measures to ensure the protection of personal information to which it has access;
- Accesses only the personal information required to perform its duties;

- Uses the personal information to which it has access for the purposes for which it was collected;
- Ensures that personal information held by Groupe Nutri is complete, up-to-date and accurate for the purposes for which it is collected or used;
- Ensures that the means used to destroy personal information are secure and keep it confidential;
- Informs his immediate supervisor and the Privacy Officer of any incident related to the protection of personal information held by Groupe Nutri;
- Participates in Groupe Nutri's privacy awareness and training activities.

III. COMPLAINTS ABOUT PERSONAL INFORMATION

Procedure for handling complaints about the protection of personal information

Anyone who considers that Groupe Nutri is not respecting his or her privacy rights may promptly submit a written complaint to the Privacy Officer.

The *Privacy Complaint Handling Procedure* outlines how to file a complaint and how it will be handled by Groupe Nutri.

IV. ADOPTION, REVISION AND ENTRY INTO FORCE

This policy is reviewed every three (3) years from the date of adoption, or earlier if circumstances warrant. It takes effect upon adoption by the Board of Directors.

V. RELATED DOCUMENTS AND REFERENCES

This policy takes into account other documents adopted by Groupe Nutri:

- Confidentiality incident management procedure;
- Privacy Complaint Handling Policy;
- Cybersecurity Policy;
- Privacy Policy.

VI. 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.