

PRIVACY POLICY

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Collection and use of your personal information

The personal information we collect depends on the business relationship we have with you.

Users of Groupe Norda member websites

When you use Groupe Norda websites, the following personal information is collected:

- your name
- your email address
- your company
- your geographic location when visiting the site
- the language in which you use the site
- your age group
- if applicable, your gender

This personal information is collected using cookies found on our sites or through a contact request or newsletter subscription.

We use this personal information for legitimate business purposes, such as the following:

- to respond to your requests for information
- to promote our products and services

We do not sell your personal information to third parties. Your personal information may be transferred to the following third parties for the following reasons:

- to other entities of Groupe Norda Inc. so that these other entities may respond to your questions
- to third parties to which we are legally required to disclose personal information

Potential or current clients, partners, subcontractors or consultants

We collect the following personal information concerning clients, partners, subcontractors or consultants:

- your name
- your professional title
- your company
- your email address
- your telephone number
- your business address

We may collect this information:

- when you request information from us in writing or by telephone
- during a face-to-face meeting
- when services are rendered by Norda Stelo Inc. or one of its subsidiaries, or when a contract is signed with Norda Stelo Inc. or one of its subsidiaries
- when prospecting your company
- when accessing public sources such as the websites of your organizations, associations, etc.

We use this personal information for legitimate business purposes, such as the following:

- to render professional services
- to negotiate and sign service agreements with you
- to comply with current regulatory requirements
- to transmit information required to perform services
- to prepare and transmit invoices or payments in connection with services rendered
- to answer occasional questions that may arise during a work assignment
- to carry out prospecting and business planning

We do not sell your personal information to third parties. Your personal information may be transferred to the following third parties for the following reasons:

- to other entities of Groupe Norda Inc. so that these other entities can answer your questions or take action in the context of services or agreements
- to third-party suppliers that provide services to our clients
- to the authorities in the event of formal investigations into fraud, financial crimes or corruption or in comparable situations
- to government authorities when required by law
- to third parties to which we are legally required to disclose personal information

Potential or current candidates for employment with Groupe Norda Inc.

We collect and process certain personal information when staffing vacant positions within our company. We collect your personal information when you apply for a position, whether through the “Careers” page on our website or by any other means. We may also check the references you provide as well as publicly available sources such as social media or Google. As provided for by applicable regulations, we may retain your personal information obtained in connection with a job application for future consideration.

The personal information collected when you apply for a position includes the following:

- your name
- your professional title, if applicable
- your email address
- your telephone number
- your professional training
- any information included in your curriculum vitae
- any personal information included in a cover letter, if applicable

We use the personal information collected in this process:

- to evaluate your application in relation to the position for which you have applied and possibly for other vacant positions in our company
- to obtain or verify certain information from third parties or obtain recommendations from third parties
- to sign an employment contract with you
- to contact you regarding other positions that may match your profile

We do not sell your personal information to third parties. Your personal information may be transferred to the following third parties for the following reasons:

- to other entities in Groupe Norda Inc. that have a vacant position matching your profile
- to service providers retained by Groupe Norda Inc. for staffing purposes, such as firms that carry out criminal background checks or information verification
- to third-party suppliers that provide us with human resources management support services
- to third parties to which we are legally required to disclose personal information

International transfer and processing of personal information

We have business locations in Quebec, Canada and other countries. We have servers in Canada and New Caledonia. The personal information we collect is stored or processed there. In order to complete our assignments, we may have to transmit certain personal information from one place of business to another. In these circumstances, your personal information may end up in a jurisdiction that does not have exactly the same legislative protections as Quebec, and that personal information may be accessible to local government agencies pursuant to court orders or local legislation.

Personal information is transmitted using reasonable security measures and only when absolutely necessary. By agreeing to let us collect your personal information in accordance with this Policy, you also agree that that information may be transmitted outside Quebec.

Protection of personal information

We have implemented reasonable security measures to protect your personal information. The aim of those measures is to protect against unauthorized access, use or communication (of any kind) and against the loss or destruction of information. As part of our contractual agreements with external suppliers, we have implemented security measures to ensure the protection of your personal information processed by those third parties.

Social media and links to other sites

We have official pages on social media such as Facebook, X and LinkedIn. We do not control the privacy policies of those sites. We recommend that you exercise caution when using those platforms and limit the sharing of personal information on our pages.

The same may apply to links on our site leading to third-party sites. We do not control the privacy policies of those sites and recommend that you exercise caution when sharing personal information with them.

Cloud

Your personal information may be stored in the cloud. That personal information may therefore be processed by third-party suppliers on our behalf and stored in Canada. We have implemented internal measures to ensure the protection of your personal information by those suppliers and to ensure that your personal information is not used in a manner contrary to this Policy.

Retention of personal information

We retain your personal information for as long as necessary to fulfil the purpose for which it was collected. We retain that information to meet our legal obligations, provide our services or settle any disputes.

Your rights as the concerned person

As the concerned person, you have certain rights in relation to your personal information. Those rights may be restricted by certain conditions or exceptions.

Access to your personal information

We must confirm to you the existence of your personal information in our possession and allow you to obtain a copy.

Rectification

You may contact us to correct or update your personal information.

All requests for access or correction must be sent to renseignements.personnels@norda.com. The Privacy Officer must respond to your request within thirty (30) days of receipt. We must provide reasons for any refusal, including the various legislative provisions on which the refusal is based. In the event of refusal, you will be informed of the alternative remedies available to you, including the applicable time limits. There is no charge for access to your personal information, but you may be asked to pay a reasonable fee for the transcription, reproduction or transmission of documents containing your personal information. Those costs will be disclosed to you prior to any transcription, reproduction or transmission of your personal information.

Deletion

You may request that your personal information be deleted from our databases. We need to take a number of factors into account for this type of request, including the applicable

legislative provisions regarding record-keeping obligations. Consequently, it may not be possible to process your deletion request in its entirety at the time your request is made.

Withdrawing your consent

You may withdraw your consent to the direct transmission of marketing material at any time. This request can be made directly by using the button provided in the emails sent to you.

Compliance

This Policy complies with current Quebec legislation, including the *Act respecting the protection of personal information in the private sector*.

Contact us

If you have any questions regarding the retention or protection of your personal information held by Norda Stelo, or if you wish to make a complaint, you may contact the company's Privacy Officer, Mia Malone, at renseignements.personnels@norda.com.

Amendments

We may need to amend the Policy from time to time to ensure compliance with applicable privacy and data protection legislation and to update our privacy practices.

Last updated: September 2023