

## Privacy policy

The masculine form is used indiscriminately for the sole purpose of lightening the text.

### POLICY OBJECTIVE

Groupe Alesco recognizes the importance of its role in the responsible management of Personal Information. With this in mind, we have established this policy to guide our actions and those of its employees and managers, to ensure compliance with legal and regulatory requirements for the protection of Personal Information.

By adopting such a policy, Groupe Alesco aims to preserve the trust of its customers, partners and employees, and to ensure compliance with the laws governing these areas.

This policy also provides for the implementation of a Privacy Management Program within Groupe Alesco, establishing a company-wide culture of privacy and the protection of Personal Information.

Groupe Alesco's commitment in this respect is an integral part of its practices, and compliance with these rules is a strict condition of employment.

### PROJECT OBJECTIVES

This policy has the following objectives:

1. Confirm the commitment of Groupe Alesco and all stakeholders listed in the "Scope" section to comply with legal and regulatory requirements, and to promote a culture of respect for privacy and Personal Information collected, held, used, disclosed, retained, destroyed or anonymized.
2. Outline the key elements of the Privacy Management Program and how to comply with legal and regulatory requirements regarding the collection, holding, use, disclosure, retention, destruction or anonymization of personal information.
3. Meet legal and regulatory requirements for the protection of Personal information.
4. Define the roles and responsibilities of the various stakeholders within the company.

### DEFINITIONS

To simplify reading, definitions of certain terms and expressions used in this policy are given in **Appendix 1**. These terms and expressions are identified in the text by the use of a capital letter at the beginning of the word.

### SCOPE

This policy applies to all of Groupe Alesco's employees, managers, partners and independent contractors as well as to any individual or legal entity duly authorized by Groupe Alesco to act on its behalf.

## GUIDING PRINCIPLES

To meet these obligations, Groupe Alesco has adopted the following guiding principles:

1. **Protection of Personal Information and Privacy:** Ensuring the protection of Personal Information and privacy in accordance with legal and regulatory requirements, including ensuring compliance with the criteria of necessity, consent, transparency, security, limiting collection, limiting use, limiting disclosure, limiting retention, accuracy, as well as the ability for an individual to file a complaint or exercise any other rights provided in legal and regulatory requirements.
2. **Openness:** Groupe Alesco makes readily available to its customers specific information about its policies and practices relating to the protection of Personal Information, including information about (i) the use of Third Parties, (ii) the fact that Personal Information may be stored outside Quebec, (iii) the use of technology to make automated decisions, (iv) its retention, destruction and anonymization practices, and (v) how to exercise their rights.
3. **Consent:** Personal Information may not be collected, used or disclosed without the prior knowledge and consent of the individual concerned, unless justified for legal, security or other legal reasons permitted by legal and regulatory requirements.
4. **Collection and necessity test:** Personal Information collected shall be limited to that which is necessary for the fulfillment of the purposes for which it is collected (i.e., the reason for which it is collected) and shall be obtained using fair practices that comply with legal and regulatory requirements.
5. **Limiting Use, Disclosure and Retention:** Personal Information may only be used, disclosed or retained for the purpose for which it was collected, unless the individual has consented to such use, disclosure or retention, or as otherwise permitted or required by law or regulation.
6. **Accuracy:** Groupe Alesco uses its best efforts to ensure that the Personal Information it collects, holds or manages is always accurate and up-to-date.
7. **Retention, destruction or anonymization:** Personal Information is retained, destroyed or anonymized in accordance with legal and regulatory requirements and may not be retained indefinitely unless it has been appropriately anonymized.
8. **Rights of individuals:** Groupe Alesco informs its customers of their rights regarding the protection of Personal Information and how they can exercise them. Groupe Alesco has mechanisms in place to respond to and process such requests within the timeframes required by legal and regulatory requirements. The same applies to the right to file a complaint.
9. **Security measures:** Groupe Alesco implements security measures to protect Personal Information that is collected, used, disclosed, retained or destroyed in a manner that is reasonable in light of the sensitivity of the information, the purpose for which it is to be used, its distribution and the medium used.



## PRIVACY MANAGEMENT PROGRAM

Groupe Alesco's Privacy Management Program includes the following key elements:

1. **Governance, Frameworks and Documentation:** This policy sets out Groupe Alesco's guidelines for the protection of Personal Information. Other Frameworks may accompany this Policy in order to meet specific legal and regulatory requirements or to meet the needs of each Department.

In addition to this policy, Groupe Alesco must put in place Frameworks in order to be able to demonstrate its compliance with the legislation. As a minimum, Groupe Alesco should provide Frameworks for the following aspects:

- a. Management of individual rights, including management of complaints and other recourse;
  - b. Retention, destruction or anonymization of Personal Information;
  - c. Third-party management;
  - d. Management of incidents involving Personal Information;
  - e. Automated decision-making;
  - f. Use of Personal Information for Research Purposes.
2. **Privacy Officer:** Groupe Alesco shall designate an individual to act as Privacy Officer. Unless specifically appointed by the Administration, this responsibility is vested in the person having the highest authority within Groupe Alesco.
  3. **Inventory of Personal Information:** Groupe Alesco must know the type, amount and sensitivity of the Personal Information it holds. It must determine the purposes for which it collects, uses or communicates such information and where it keeps it (within the company or with a Third Party).
  4. **Risk management:** Groupe Alesco must ensure that legal and regulatory risks related to the protection of Personal Information are identified and assessed. This includes conducting Privacy Impact Assessment ("PIA") when required by legal and regulatory requirements.
  5. **Training and Awareness:** Groupe Alesco shall provide training and awareness to its Users. Training and awareness shall include, but not be limited to, legal and regulatory requirements, this Policy or any Frameworks or documentation that may relate to the protection of Personal Information. Training is updated as needed and must be adapted to the User's function and tasks, when required. Training is given to Users as soon as possible following their arrival on the job or in accordance with their new assignment, where relevant.
  6. **Accountability:** The purpose of accountability is to ensure that fair, sufficient and relevant information regarding the protection of Personal Information is communicated to the Administration in a timely manner.
  7. **Ongoing evaluation and review:** The Privacy Management Program should be subject to ongoing evaluation and review to ensure its relevance and effectiveness, particularly in light of legislative and/or corporate changes.



## **SAFETY MEASURES**

Groupe Alesco employs appropriate security measures to protect Personal Information in its custody or control. All Users must therefore exercise caution and diligence when handling or processing Personal Information. They must at all times apply appropriate security measures (physical, organizational and technological) to protect Personal Information, all in accordance with this Policy.

## **RESPONSABILITIES**

As part of our commitment to protecting your privacy, we have established privacy policies that describe the obligations of Groupe Alesco employees when handling your personal information. All employees must obtain the necessary consents from you when collecting, using and/or disclosing your personal information, in accordance with the law. In addition, they may only access your information if they need it to perform their duties.

Groupe Alesco management's role in protecting your personal information includes ensuring compliance with appropriate retention and disposal guidelines and maintaining a reporting process to Groupe Alesco's Person in Charge of Protection of Personal Information.

The Person in Charge of Protection of Personal Information assists all employees in the collection, use, disclosure and retention of information in accordance with applicable laws and policies. The Person in Charge of Protection of Personal Information also acts as the official liaison with privacy regulators and is the primary resource for all privacy complaints, concerns and issues.

## **ENTRY INTO FORCE**

Effective date: May 2026



## APPENDIX 1 - DEFINITIONS

**Administration:** Corresponds to the director(s) of Groupe Alesco.

**Department:** Sector grouping Users performing similar tasks and functions, such as marketing, human resources, accounting, operations, etc.

**Framework :** Procedures, processes, standards, policies, directives or rules adopted by Groupe Alesco and covering the requirements to be met or the company's ways of doing things.

**Personal information:** Any information concerning a natural person and directly or indirectly allows that person to be identified.

**Person in Charge of Protection of Personal Information:** Person responsible for ensuring compliance with legal and regulatory requirements for the protection of Personal Information. He or she is the person with the highest authority within the company, or the person designated by the company. The person responsible for the protection of personal information may delegate all or part of his or her duties.

**Third party:** Individual or legal entity acting as a service provider for Groupe Alesco.

**User:** An employee, partner or manager of Groupe Alesco as well as any individual or legal entity duly authorized by Groupe Alesco to act on its behalf.

