

## Confidentiality and privacy policy

### 1. General information

#### a) Introduction

The protection of privacy is important to Crevier Group inc. as well as to all its wholly-owned subsidiaries or subsidiaries under its direct or indirect control (collectively, the "**Company**", "**We**", "**Us**", "**Our**"). For this reason, We have implemented protection measures and sound management practices for your Personal Information in accordance with applicable laws in Quebec and Canada.

This Confidentiality and privacy policy (the "**Policy**"), which should be read in conjunction with Our other policies on Our Websites, describes Our practices with respect to the collection, use, processing, disclosure and retention of Personal Information of Our customers, visitors and users.

By using Our Websites <https://crevier.ca>, <https://catalyslubrificants.ca>, <https://catalyslubricants.ca> and <https://nemco.ca> (the "**Websites**") or any of Our Services, 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 may not visit, access or use Our Websites or Services, or share your Personal Information with Us.

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

#### b) Person in charge of the protection of personal information

Questions, comments and complaints regarding the Company's Policy and practices may be directed to Our Person in charge of the protection of personal information at the following coordinates:

**Phone number:** 514-357-6107, ext. 15128

**Email:** [rprp@crevier.ca](mailto:rprp@crevier.ca)

**Address:** 2025 Lucien-Thimens Street, Montreal, Quebec H4R 1K8

### 2. Definitions

The following words and expressions, when appearing with a capitalized first letter in the Policy, have the meanings attributed to them hereinafter, unless otherwise implied or explicit in the text:

**"Person in charge of the protection of personal information"** means the person who is responsible for the application of this Policy and whose contact information is identified in section 1b) of this Policy.

**"Personal Information"** means any information that relates to a natural person and allows that person to be identified, i.e., that directly or indirectly reveals something about the identity, characteristics (e.g.,

abilities, preferences, psychological tendencies, predispositions, mental abilities, character and behaviour of the person concerned) or activities of that person, regardless of the nature of the medium or the form in which the information is accessible (written, graphic, sound, visual, computerized or other).

**"Service Provider"** means any individual or entity that processes Personal Information on behalf of the Company. This includes third-party companies or individuals employed by the Company to facilitate the Services, to provide the Services on behalf of the Company, to perform services related to the Services or to assist the Company in analyzing the use of the Services.

**"Services"** refers to Our Websites and Our pages on social networks.

### **3. Processing of Personal Information**

#### **3.1 Collection of Personal Information**

In the course of Our activities, We may process various types of Personal Information, including the information listed below:

- contact information, such as your first and last name, telephone number, province and employer;
- information relating to Services, such as information concerning Services We have rendered to you;
- information automatically collected through the use of Our Websites and Services, including :
  - o connection and other information about your activities on the Websites, such as your IP address, the pages you visit, the time and date of your visits, the number of connections, the type of browser you use, your device's operating system and other hardware and software information 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's settings).

In each case, such Personal Information is processed in accordance with the legitimate and necessary purposes listed in article 3.2 below.

#### **3.2 Use of Personal Information**

We may use your Personal Information for the legitimate purposes described below:

- operate, maintain, supervise, develop, improve and offer all the functionalities of Our Websites;
- introduce you to and/or provide Services;
- allow you to apply for job offers;
- enable you to acquire Our Services and carry out transactions in connection with Our Services;

- perform Our contractual obligations to you;
- develop, improve and offer new Services;
- send you messages, updates and security alerts;
- for marketing and business development purposes, if you have previously consented to the processing of your Personal Information for these purposes;
- answer your questions and provide assistance when needed;
- collect opinions and comments regarding Our Services;
- conduct research, analysis and statistics in connection with Our business and Our Services;
- detect and prevent fraud, errors, spam, abuse, security incidents and other harmful activities;
- for any other purpose permitted or required by law.

### 3.3 Disclosure of Personal Information

We may disclose your Personal Information to Our employees (including marketing and sales departments), contractors, consultants, agents, Service Provider, service suppliers and other trusted third parties (collectively, "**Service Providers**"), who require such information to assist Us in operating Our Websites, conducting Our business or servicing you, provided that such Service Providers have previously agreed in writing to maintain the confidentiality of your Personal Information in accordance with applicable laws and Our information governance program.

We do not sell, trade or otherwise disclose 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 analysis, hosting and storage. We have defined below the cases in which such sharing may take place:

- We use Google Analytics to analyze the audience of Our Websites, compile statistics and converse with customers and prospects. See their privacy policy;
- We use Google Ads to analyze the audience for Our Services, compile statistics and converse with customers and prospects. See their privacy policy;

- We use Facebook Pixel services to help understand and serve ads, compile statistics and converse with customers and prospects. See their privacy policy;
- We use Bing Ads technology to collect and store data to create usage profiles using pseudonyms. See their privacy policy;
- We use the services of ActiveCampaign to manage Our customer relationships. See their privacy policy;
- We use the services of Jobilico, Indeed, Emploi Québec and Université Laval to recruit Our employees. See their respective privacy policies;
- We use the Meta Group's Facebook and Instagram social network services to communicate about Our activities and to present Our Services and Our products. See Meta's privacy policy;
- We use the services of the LinkedIn social network to communicate about Our Services and Our products. See their privacy policy;
- We use YouTube to present Our products and Services. See their privacy policy;
- We use the services of Weavy for customer relationship management (CRM). See their privacy policy;
- We use Microsoft 365 to store Our documents. See their privacy policy;
- We use the services of Evolving Web and Astral to host Our Websites. See their respective privacy policies;
- We use the services of Lead Forensics to analyze and characterize the traffic on Our Websites. See their privacy policy;
- We use Metatracer to ensure Our compliance with the privacy laws that apply to Us. See their privacy policy.

Prior to disclosing your Personal Information to 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 disclosing your Personal Information to them, and We provide them with only the Personal Information they need to perform their mandate. As part of these contracts with Our Service Providers, We undertake to ensure that the principles set out in this Policy are respected, and these Service Providers are required to use Personal Information confidentially, in accordance with Our instructions and solely for the purposes for which it was provided. We provide sufficient assurances that adequate protection measures are in place that are proportionate to the sensitivity of the Personal Information being

processed or disclosed. When Our Service Providers no longer need your Personal Information, We ask them to destroy this data in an appropriate manner.

### **3.3.2 Compliance with legislation, responding to legal requests, preventing harm and protecting Our rights**

We may disclose your Personal Information when 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 proceedings;
- to protect Our rights, Our privacy, Our security, Our property, yours or that of third parties;
- to enable Us to pursue available remedies or limit the damages We may suffer; and
- in accordance with applicable laws, including laws outside your country of residence.

### **3.3.3 Commercial transaction**

We may share, transfer or communicate, in strict compliance 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*, SQ 2021, c 25 (the "**Law 25**", assented to on September 22, 2021), your Personal Information in the event of a sale, transfer or assignment, in whole or in part, of the Company or Our assets (for example, as a result of a merger, consolidation, change of control, reorganization, bankruptcy, liquidation or any other business transaction, including in connection with the negotiation of such transactions). In such a case, We will inform you before your Personal Information is transferred and is governed by another privacy policy.

## **3.4 Consent**

Wherever possible, the Company obtains consent directly from the individual concerned for Us to collect, use and disclose his or her Personal Information. However, if you provide Us with Personal Information about other persons, you must ensure that you have duly notified them that you are providing Us with their information and that you have obtained their consent to such disclosure.

We will seek your explicit, manifest, free and enlightened 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 involved in any of the Company's

processing activities. We will ask for your consent for each specific purpose in clear and simple terms, separate from any other information that will be communicated to you.

BY USING OUR WEBSITES, BY TRANSMITTING YOUR PERSONAL INFORMATION BY E-MAIL, YOU CONSENT TO THIS POLICY AND TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE POLICY.

If you do not consent, please stop using Our Websites. Except where otherwise provided 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 Websites may no longer be available to you or We may no longer 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 is necessary to fulfill the purposes for which it was collected, unless you consent to your Personal Information being used or processed for another purpose. As an indication, the duration of certain information may extend up to 7 years following the end of the Services rendered by the Company to you. In addition, Our retention periods may be modified from time to time in response to legitimate interests (for example, to ensure the security of Personal Information, to prevent abuse and breaches or to prosecute criminals).

For more information on the periods for which your Personal Information is retained, please contact Our Person in charge of the protection of personal information using the contact details set out in section 1b) of this Policy.

## **4. Your rights**

As a person concerned, you may exercise the rights set forth below by communicating in writing with Our Person in charge of the protection of personal information at the contact information provided in section 1b) of the Policy. Please note that We may ask you to verify your identity before responding to 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 exceptions provided by applicable law;
- You have the right to access your Personal Information, to request a copy, including paper copies, of the documents containing your Personal Information, subject to the exceptions provided by applicable law, and to obtain, where applicable, further details on how We use, communicate, store and destroy it;
- You have the right to rectify, amend and update the Personal Information We hold about you if it is incomplete, ambiguous, out of date or inaccurate;

- You have the right to withdraw or change your consent to the Company's collection, use, disclosure or retention of your Personal Information at any time, subject to applicable legal and contractual restrictions;
- You have the right to ask Us to stop distributing your Personal Information and to deindex any link attached to your name that gives access to this information if such distribution contravenes the law or a court order;
- You have the right to request that your Personal Information be communicated to you or transferred to another organization in a structured and commonly used technological format;
- The right to be informed of any privacy incident involving your Personal Information that may cause you serious harm. We keep a record of all privacy incidents and assess the harm they may cause;
- You have the right to file a complaint with the Commission d'accès à l'information, subject to the conditions set out in the applicable law. In order to process your request, you may be asked to provide appropriate identification or to identify yourself in some other way.

## 5. Cookies and other tracking technologies

We do not use cookies or similar technologies (collectively, "**Cookies**") to help Us operate, protect and optimize Our Websites 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 Websites, including your preferred language, browser type and version, the type of device you are using and your device's unique identifier.

While some of the Cookies We use are deleted after your browser session ends, other Cookies are retained on your device or browser to enable Us to recognize your browser the next time you visit Our Websites. The data collected through these Cookies is not intended to identify you. In particular, they enable Us to guarantee the operation of Our Websites, to improve the user's browsing experience and to provide certain data that enables Us to better understand the traffic and interactions that take place on Our Websites, as well as to detect certain types of fraud. Cookies do not harm your device and cannot be used to extract Personal Information.

You can set your browser to notify you when you visit Our Websites, so that you can decide whether or not to accept some or all Cookies. Please note that disabling Cookies on your browser may adversely affect your browsing experience on the Websites and prevent you from using some of its features.

## 6. Safety measures

The Company has implemented physical, technological and organizational security measures to adequately protect the confidentiality and security of your Personal Information against loss, theft or

unauthorized access, disclosure, reproduction, communication, use or modification. These measures include :

On an administrative level, 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 pseudonymization and/or, where applicable, the destruction of Personal Information;
- determine the roles and responsibilities of Our employees throughout the life cycle of Personal Information and documents;
- establish procedures for intervention and response in the event of a confidentiality incident;
- govern the process for requests and complaints relating to the protection and handling of Personal Information.

On a technical level, the use of several means such as :

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

Given the public nature of this Policy, We have not provided an exhaustive list of the measures We are implementing.

Despite the measures described above, We cannot guarantee the absolute security of your Personal Information. If you have reason to believe that your Personal Information is no longer secure, please contact Our Person in charge of the protection of personal information immediately using the contact details set out in section 1b) above.

## **7. Changes to this Confidentiality and 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 version of the Policy and display the update date in the footer of the Policy. We will also notify you by e-mail at least thirty (30) days before the effective date of the new version of Our Policy. If you do not agree to the new terms of the Policy, please do not continue to use Our Websites and Services. If you continue to use Our Websites or Services after the new version of Our Policy becomes effective, your use of Our Websites and Services will be governed by the new version of the Policy.



## **8. Links to third-party websites**

From time to time, We may include on Our Websites references or links to Our Facebook page, LinkedIn, YouTube or other pages of Our social networks, websites, products or services provided by third parties (the "**Third Party Services**"). These Third Party Services, which are not operated or controlled by the Company, are governed 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 the Websites and Services We offer. The Policy does not extend to Third Party Services such as Our Facebook and YouTube pages.

## **9. Invisible ReCAPTCHA**

Invisible reCAPTCHA analyzes activity on a web page function (e.g. mouse movements and typing patterns) to determine whether a user is a bot.

The invisible reCAPTCHA service may collect information from your device. Information collected by reCAPTCHA is stored in accordance with its privacy policy.

## **10. Reseller services**

We use reseller services. What is a reseller? In digital marketing, reselling (or retargeting) is the practice of delivering ads across the Internet to people who have already visited your website. It enables your company to leave the impression that your website visitors are following you across the Internet by presenting ads from Our Service on the websites and platforms they use most.

## **11. Payment details**

With regard to credit card details or other payment information that you have provided to Us, We undertake to ensure that such confidential information is stored in the most secure manner possible.

## **12. Individuals under 14 years of age**

We do not knowingly collect or use Personal Information from persons under the age of 14. If you are under 14 years of age, you must not provide Us with your Personal Information without the consent of your parent or guardian. If you are a parent or guardian and become aware that your child has provided Personal Information to Us without consent, please contact Us using the contact information set forth in Section 1b) above to request that We delete that child's Personal Information from Our systems.

**13. Applicable laws**

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

**14. Conflict**

In the event of any discrepancy between the French version of this Policy (accessible from the home page) and this text, the French version shall prevail.