

PRIVACY POLICY

Effective date: May 18th, 2023

Congebec is committed to protecting the privacy of its employees and other representatives, and to ensuring the confidentiality of personal information entrusted to it during its activities.

Our Privacy Policy (the "**Policy**") describes our standards for the collection, use, disclosure, and retention of your personal information. It also describes the ways in which we obtain your consent and the choices you have regarding your personal information, as well as how you can access and correct it, if necessary.

We reserve the right to update and change the terms of the Policy at any time. If we decide to update and materially change the terms of the Policy, we will post those changes wherever the Policy is posted. If we deem it appropriate, we may also decide to notify you by e-mail at the personal e-mail address you have provided to us.

"Congebec", "we", "us" and "our" refer to the Congebec group of companies, namely Congebec Logistique inc., Congebec inc. and Congebec (Transport) inc.

Please read this policy carefully. If you have any questions about this Policy or our handling of your personal information, please contact our Privacy Officer at infoconf@congebec.com.

WHAT IS PERSONAL INFORMATION

Definition. Personal information is any information about you as an individual that allows you to be identified.

Excluded. The following information is not personal information protected by this policy:

- Professional details: for example, your title, the address of the company where you work, your telephone number and your e-mail address.

Required. We limit our collection of personal information to that which is required for the purposes of your employment with us. You will therefore be required to provide us with and keep up to date the following personal information:

- Your personal information: for example, last name, first name, gender, date of birth, address, e-mail address, telephone numbers, language of correspondence, emergency contact; and
- Your personal identification numbers: for example, proof of citizenship, social insurance number and health insurance number.

Created during your employment. Some personal information will be created over the course of your employment with us:

- Your terms and conditions of employment: for example, salary, years of service, benefits.
- Your employment status: for example, hourly, full-time, or part-time, regular or temporary.
- Your evaluations: for example, performance reviews, disciplinary or suspension letters.
- Your image: for example, captured by surveillance cameras or photos taken as part of internal communications.
- Your medical data: for example, if you are ill and provide a doctor's note; and
- Your financial data relating to the group savings plan: for example, the distribution of your assets in your portfolio.

Professional tools. The tools we provide to you in the course of your employment, such as smart phones, tablets, computers, and the like, are the property of Congebec. No personal information other than that provided and protected in accordance with this Policy shall be included therein. If you choose to store personal photos, personal e-mails or any other personal information that is not required for the purposes of your employment, we will not be able to guarantee their protection. We strongly recommend that you take steps to remove any personal information from your work devices.

YOUR CONSENT

We need your consent to collect your personal information.

When you are hired, you complete a hiring form in which you provide us with your personal information. By signing this form, you consent to this initial collection, and to the subsequent collection of personal information under this Policy throughout your employment with Congebec. You also consent to the use and disclosure of your personal information as described in this Policy.

We will seek your specific consent for any collection, use or disclosure of your personal information that is not described in this Policy.

In certain limited circumstances, permitted by law, we may collect, use, or disclose personal information without your knowledge or consent. Such circumstances arise when, for legal, medical or security reasons, it is impossible or unlikely to obtain your consent. For example, in the event of a workplace accident, we may be required to disclose surveillance camera images and medical information to the Worker's Compensation Board.

Consent may be given by you or by your authorized representatives, for example, a legal guardian or an individual with power of attorney.

You may withdraw your consent at any time, subject to certain legal or contractual restrictions. For example, if you do not allow us to use your bank details, we will no longer be able to pay your salary. You will need to make your request to our Privacy Officer at infoconf@congebec.com. We will inform you of the consequences of any withdrawal,

including the possibility of ceasing to receive certain benefits. If you choose to withdraw your consent, your decision will be recorded in our files.

PURPOSES FOR WHICH WE COLLECT YOUR PERSONAL INFORMATION

We need your personal information for the following purposes:

- Paying you
- Withholding taxes
- Offer you employee benefits, group insurance, retirement plans, employee assistance programs, financial and legal advisors
- General communications to other employees
- Special communications addressed to you personally
- Evaluate, promote or change your status
- Health and safety at work

We also use the personal information we obtain about you to generate statistics and gather information about our workforce. When we collect information for these statistical purposes, your personal information will not be individually identifiable, but will be part of a whole composed of data from all our employees or sub-groups.

INTERNAL DISCLOSURE

Only those persons who need to know your personal information for the purposes covered by this policy have access to it. These persons are themselves required to keep your personal information confidential.

DISCLOSURE TO THIRD PARTIES

Your personal information will not be shared with third parties other than:

- our service providers, various levels of government and our financial and legal advisors, as described in this Policy; or
- if required or authorized by law, for example to prevent an act of violence, or for study or research purposes; or
- if ordered by a competent court.

Service providers

To provide you with certain services, we use external suppliers and must disclose personal information to them. Your personal information will be disclosed to the following service providers:

- Workforce management: at the time of publishing this policy, ADP;
- Benefits: at the time of publication of this policy Desjardins Financial Security;
- Employee assistance programs: at the time of publication of this policy Dialogue and Telus Health;
- Anonymous line: at the time of publishing this policy Alias;
- Cell phone services, or vendors of computers or other devices: we'll provide them with your name and personal address to send you the device;

- Unions: When you are covered by a collective agreement, the law may require us to disclose personal information to the relevant union or regulatory authorities.

When disclosing your personal information, we ensure that these service providers have the necessary measures in place to ensure the protection of your personal information and, if required, sign non-disclosure agreements to this effect. You may be required to sign specific consent forms requested by some service providers.

When renewing service contracts with suppliers, we may need to disclose personal information to potential suppliers in order to obtain bids. In such cases, these potential suppliers will all be required to sign non-disclosure agreements to keep your personal information confidential and to destroy it if they are not retained.

Government levels

Some government agencies request some of our employees' personal information, including:

- The organization responsible for health and safety in your province;
- Ministry of Revenue of the province where you reside or federal;
- Ministry of Health;

The various levels of government are subject to specific privacy laws.

Financial and legal advisors

We may also share this information with third parties, such as financial or legal advisors, in certain limited circumstances:

- sale of all or part of our company
- other financial transactions
- audit of financial statements
- investment management for group savings plans
- disputes
- employment contract

Legal and financial advisors are subject to legal and/or contractual confidentiality obligations, which include non-disclosure of personal information.

CONSERVATION

Conservation measures

All personal information we collect will be kept confidential in accordance with applicable privacy and data protection laws in the jurisdictions in which we do business. We take reasonable administrative, technical, and physical measures to protect your personal information from loss, theft and unauthorized access, use, alteration or destruction.

- Physical security measures: locked filing cabinets, access cards to premises; and

- Technological security measures: passwords, access management systems, monitoring, and control to detect suspicious activity.

All personal information we collect is kept in Canada.

Storage period

Your personal information is kept only as long as necessary for the purposes for which it was collected or to comply with our legal and regulatory obligations. For example, in Canada, we are subject to various laws and regulations that provide for minimum retention periods. Retention periods must also consider the exhaustion of potential recourses and limitation periods applicable in Canada. These periods may vary according to each situation, and we may retain your personal information after your employment has ended.

Destruction or anonymization

Once the retention period has expired, we will destroy or anonymize your personal information. When we destroy documents and data, we apply rigorous, safe, and secure procedures and ensure that only authorized personnel have access to the documents and data. When we anonymize your personal information, it will be for serious and legitimate purposes, as provided for by law.

Confidentiality incidents

We will inform you of any breach of security, confidentiality or unauthorized disclosure of personal information that may cause you harm in accordance with any applicable laws, regulations, or guidelines.

In the event of a privacy incident, we will take reasonable steps to reduce the risk of harm to you and to prevent further incidents of similar nature.

ACCESS TO YOUR PERSONAL INFORMATION

By law, you have the right to access your personal information and to obtain more precise information about the processing of your personal information.

You may also request correction if the personal information is out of date, inaccurate, incomplete, or ambiguous, or if the collection, disclosure or retention of the information is not authorized by law. If you find any errors or inaccuracies, please let us know and we will make the necessary corrections.

Any request for access to your personal information or for more detailed information or correction relating thereto:

- Must be sent in writing;
- Must be made to the Privacy Officer by e-mail at infoconf@congebec.com;
- Will be processed within 30 days of receipt. The application will be reviewed, and a decision based on its merits will be rendered;



- You will receive a written reply within this period. If the request is refused, we will explain the underlying reasons. A request may be refused for legitimate reasons provided by law, such as to protect the personal information of third parties; and
- If you are not satisfied with the response you receive from the Privacy Officer, you may request a review of the decision in accordance with the regulations applicable in your province.

COMPLAINTS

Any complaints regarding the handling or protection of your personal information can be directed by e-mail to infoconf@congebec.com.

If you would like your complaint to be handled anonymously, you can use the hotline at www.alias-solution.com/contact/en/congebec.

You may also file a complaint with the Access to Information Commissioner of Quebec or Alberta, if you reside in one of these two provinces, or with the Federal Commissioner for employees of Congebec (Transport) inc.