

At Paber Aluminium, we place great importance on protecting the personal information of our customers, employees, and representatives. In accordance with the law on the protection of personal information in the private sector, we are committed to preserving the confidentiality of personal information collected in the course of our activities. Our privacy policy aims to inform you about our practices regarding the collection, use, disclosure, retention, and protection of your personal information. By providing us with your personal information, you agree to the terms of this policy and authorize us to process your information in accordance with it.

1. Consent

1.1 Commitment to Privacy Protection

We commit to safeguarding the privacy of our users. We collect and use personal information only with their explicit consent and in compliance with applicable laws.

1.2 Acceptance of Our Policy Terms

By accessing our website www.paber-alu.com or providing us with personal information, you agree to the terms of our privacy policy. This includes your consent to the collection and use of your personal information in accordance with this policy.

1.3 Right to Withdraw Consent

You have the right to withdraw your consent at any time. However, this is subject to certain legal or contractual restrictions. We will inform you of the possible consequences of such withdrawal, such as the inability to provide certain products or process certain requests. Your decision to withdraw will be recorded in our records.

1.4 Exceptions to the Need for Consent

In certain exceptional circumstances, we may collect, use, or disclose personal information without obtaining your prior consent. This may occur in situations where legal, medical, or security imperatives make obtaining your consent impossible or impractical. These situations include, but

are not limited to, cases of suspected breach of contract, prevention or detection of fraud, or law enforcement needs.

2. Collection of Personal Information

2.1 We collect personal information through various means, including:

- Emails and communications with our customer service
- Cookies and similar technologies on our website
- Video surveillance
- Connected objects

2.2 We may also collect information via third parties, such as:

- A recruitment portal that allows candidates to submit their CV and personal data.
- Professional social networks like LinkedIn for recruitment or marketing purposes.
- A consultant who provides some of the services we offer to our clientele.
- An online payment service provider to process financial transactions.
- A cloud computing company storing customer data.
- A provider of IT security services monitoring threats and protecting data.
- A logistics provider managing product delivery and collecting recipient information.

3. Types of Personal Information Collected

3.1 We collect various types of data, including, but not limited to:

- **Personal identifiers** (name, postal address, email, phone number)
- **Technical or digital information** (IP address, online activities)
- **Financial information** (salary, payment details)
- **Health data** (gender at birth, health history, medication use)
- **Demographic data** (age, ethnic origin, nationality, place of residence)

3.2 Children's Privacy

We do not knowingly collect or solicit personal information from children under the age of 13. By using our website, you represent that you are at least 13 years old. If you are under 13 years old, please do not attempt to send us any personal information. If we discover that we have inadvertently collected personal information from a user under 13 years of age, we will make reasonable efforts to promptly delete such information from our files and records. We also encourage minors aged 13 or older who use the website to seek permission from their parents or guardians before submitting any information about themselves online.

If you believe that a child under the age of 13 has provided us with personal information, please contact us using the contact details provided in the following section.

4. Use of Personal Information

4.1 We use your personal information for a range of essential activities:

- **Response to inquiries:** To effectively address your requests and queries.
- **Transaction management:** Processing payments and issuing receipts for transactions made.
- **Registrations and participations:** Managing your registrations for events and training.
- **Human resources management:** For internal management and administration of human resources, recruitment, employment contracts, and service agreements.
- **Improvement of user experience:** Operating, maintaining, and enhancing our website, personalizing your online experience, and providing requested services and information.

These uses aim to enrich your experience with our services and facilitate efficient interaction with our organization.

4.2 We offer various options to allow you to control and limit the collection of your personal information. These options include:

- **Communication preferences:** You can choose to receive our communications through different means (phone, SMS, email), or opt out entirely.

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- **Cookie management:** Our website allows you to refuse or customize the use of cookies. Please note that blocking certain cookies may affect the accessibility and functionality of our site.
 - **Granular consent:** In most situations, when we collect information for specific purposes, you have the option to consent only to certain uses of your data.

It is important to note that some of these options may limit your access to all features of our service. For example, by refusing certain cookies, some parts of our website may not function as expected, or by choosing not to create an account, some customization features may not be available.

5. Sharing and Disclosure of Personal Information

5.1 The personal information collected by our organization is accessible to specific categories of our staff and certain partner organizations, with the aim of providing our products and services effectively. For example:

- **Customer service:** Accesses contact information to respond to inquiries.
- **IT department:** Accesses technical data for support and maintenance.
- **Marketing department:** Uses data for advertising campaigns and market research.
- **Delivery partners:** Receive addresses for order delivery.
- **Payment service providers:** Access financial information for transaction processing.
- **Personal information and data security officers:** Access information to ensure data security and protection against unauthorized access or cyberattacks.
- **Legal and tax consultants:** Use data to ensure compliance with applicable laws and regulations.
- **Cloud service providers:** Host data on secure servers, allowing for storage and retrieval of information.
- **Research and development partners:** Access certain data to collaborate on new innovations or product/service improvements.
- **Collection agencies:** In cases of payment default, certain information may be shared with external collection agencies.

We ensure that this information is used exclusively for the stated purposes and in compliance with confidentiality requirements. Data transfers outside of Quebec are conducted within the framework

of international collaborations, while ensuring adequate protection of information in accordance with applicable laws.

6. Links to Other Websites

6.1 Our website may contain links to third-party websites.

When you follow these links, you leave our website. The information exchanged at that time is no longer subject to our privacy policy. We recommend reviewing the privacy statements of other websites you visit before providing any information.

7. Security of Personal Information

7.1 Security Measures for Protecting Personal Information

To ensure the security and confidentiality of personal information, Paber Aluminium adopts rigorous security measures, encompassing both physical and technological aspects. Here are some concrete examples:

- **Physical security:** Use of electronic locking systems and security locks for access to offices, cabinets, and filing cabinets, installation of surveillance cameras, and restriction of access to areas where personal data is stored.
- **Access controls:** Limitation of access to personal data to authorized employees only.
- **Staff training:** Regular awareness training of staff on best data security practices.
- **Data encryption:** Protection of sensitive data using advanced encryption techniques.
- **Monitoring and intrusion detection:** Implementation of systems to monitor any suspicious activity and detect potential intrusions.
- **Disaster recovery plans:** Development of plans to quickly restore data in the event of incidents such as outages or cyberattacks.

These measures aim to protect personal information against unauthorized access, use, or disclosure, and to maximize its integrity and confidentiality. While we take all possible steps to protect your personal data, it is important to keep in mind that no method of transmission over the Internet or electronic storage is 100% secure. Therefore, we cannot guarantee its absolute security.

8. Retention and Destruction of Personal Information

We will only retain your personal data for the duration necessary for the purposes outlined in this privacy policy. We will retain and use them to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal policies.

We will also retain usage data for internal analysis purposes. This data is typically retained for a shorter period, unless it is used to enhance security or improve the functionality of our website, or if we are legally required to retain it for a longer period.

9. Your Rights

9.1 Recognition and Respect of Your Rights

As part of our privacy policy, we recognize and respect the fundamental rights of individuals affected by the personal information we hold. These rights include:

- **Right of access:** Individuals have the right to access the personal information we hold about them. For example, a customer may request to see the data collected during their registration for our service.
- **Right to rectification:** If information is inaccurate or incomplete, individuals may request its update. For example, an employee may request the correction of their incorrect postal address in our records.
- **Right to delisting:** Individuals may request that their personal information be removed from dissemination or that any hyperlink associated with their name be delisted, if such dissemination causes them harm or violates the law or a court order. This right to erasure or oblivion allows individuals to control the availability of their personal information on the internet.
- **Right to lodge a complaint:** In case of concerns regarding the processing of their data, individuals may lodge a complaint in accordance with our established process.

Subject to applicable laws, upon receipt of a written request from an individual and after verifying their identity, we will inform the individual if we hold personal information about them and provide them with this information.

We may refuse an individual access to their information in accordance with applicable laws, in which case we will provide reasons for the refusal.

To facilitate these rights, the contact information of our personal information protection officer is clearly indicated for any questions or concerns. These measures ensure that individuals can exercise their rights with confidence and transparency.

10. Policy Changes

This policy may be updated to reflect changes in our practices or legal requirements. Changes will be posted on our website. We encourage you to regularly review this privacy policy to stay informed of any changes.

11. Contact

Any requests or questions regarding this privacy policy can be sent to the person responsible for the protection of personal information at the following address:

- By email: francois.couillard@paber-alu.com
- By phone: (418) 246-5626 ext. 238

Policy Effective Date: September 14, 2023

Last Updated: February 22, 2024

12. Clauses

Sale or Transfer of Business or Assets

When a business is sold or transferred, your personal data may also be transferred to the buyer or recipient of the assets. If this occurs, Paber Aluminium will require the buyer to use your personal data in accordance with this privacy policy. This includes the use of your personal data solely by the buyer and its affiliated companies. If we are involved in a reorganization, dissolution, or liquidation, this may also result in the transfer of your personal data to a third party. In all cases, we will strive to protect your personal data and inform you of any transfer as required by applicable law.

Use of Cookies and Google Analytics

We use tracking technologies such as cookies, beacons, and scripts to enhance and analyze our website. We use both temporary and persistent cookies for various reasons, including providing the services available on the website, authenticating users, personalizing the user experience, and tracking traffic and usage information on the website.

Some cookies are essential for providing requested services and preventing fraudulent use of user accounts. We also use persistent cookies to remember user choices, such as IDs and language preferences, to enhance the user experience.

We also use persistent tracking and performance cookies to track traffic information on the website and to test new pages, features, or functionalities of the website to observe user reactions. These cookies may be administered by third parties and may directly or indirectly identify you as an individual visitor.

You can configure your browser to refuse cookies or to be alerted when a cookie is sent. However, please note that certain parts of our website may not function properly if you refuse cookies.

Analytical Data

We may engage third parties, such as Google Analytics, to assist us in collecting and analyzing information about sections visited on the website to assess and improve user experience and the website. These third parties may use cookies and other tracking technologies. If you wish to prevent the storage and processing of such data (including your IP address) by Google, you can download and install the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en> .

You can also review the privacy policy of Google Analytics by clicking the following link: <https://policies.google.com/privacy?hl=en> .

Conversion Pixels

Conversion pixels, also known as "transparent GIFs" or "tracking pixels," are tiny images, usually a single pixel, that can be placed on a web page or in an email to indicate when you have viewed that page or opened that email and to analyze response rates.