

Privacy Policy

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Introduction

S.P. Richards Co. Canada Inc., (the “**Corporation**”, “**we**”, “**us**”, “**our**”) recognizes the importance of protecting your personal information. This Policy explains how we collect, use, store and communicate your personal information.

Personal information is any information about you that allows you to be directly or indirectly identified (for example, by combining it with other information).

This Policy applies to the users and customers of our websites, applications, products and services. It does not apply to our employees, candidates or suppliers.

By providing us with your personal information after you have been informed of this Policy, in accordance with applicable laws, you consent to the collection, use, storage and communication of such information as set out in this Policy. In certain cases, your consent may also be implicit, in accordance with your reasonable expectations.

We reserve the right to update this Policy at any time and such modifications will enter into force on the date specified in the update. Please regularly check for changes to this Policy. We will consider that you have accepted the changes to this Policy if you continue to provide personal information to us once the changes enter into force.

Who collects personal information

We collect your personal information on our own behalf.

Your personal information may also be collected on our behalf by third parties, such as: providers of technology services like order management platforms or newsletter management systems, payment service provider as described below.

How and what personal information we collect

We collect personal information directly from you when you provide it to us, for example:

- Online on our website;
- In emails you send us;
- When you call us;
- When you chat with us.

In addition to the above, we may also collect personal information when you decide to subscribe to a newsletter, enter a contest or take part in a survey.

The information we collect includes the following personal information:

- last name, first name, mailing address, email address, telephone numbers, your communications with us, details on your purchases and orders.

The type of personal information we collect depends on various factors and on the context. We only collect such personal information that we consider necessary for the conduct of our business and the fulfilment of identified purposes.

Personal information may be collected if it is publicly available online, such as in social media accounts, or as otherwise permitted by applicable law. We may also collect personal information from our business partners or other third parties, provided that such third parties confirm that you have authorized them to disclose such information to us or that you expressly consent to such disclosure.

We automatically collect personal information provided by analytical tools or digital markers on our websites and in our applications. These analytical tools only collect a limited set of data, consisting of the Internet protocol address (IP address), date and time of the visit, pages visited, actions on our website, domain used to access the website, the type and version of the browser or operating system you use, as well as the previous and subsequent website accessed. This information is collected using cookies, as described in greater detail below.

We do not collect any information relating to payment cards. Payments made via our websites or applications are processed directly by our service provider, which has sole access to payment card information. Your online transactions are secured in accordance with our service provider's transmission standards, so that your transactions are routed and processed securely, more specifically in compliance with the PCI (Payment Card Industry) standard. Payment card information is encrypted at the time of the transaction.

For which purposes do we collect personal information

We collect personal information for the following purposes:

- To provide the services or information you request;
- To process your requests and orders;
- To ship the products you order;
- To manage billing and process payments;
- To process and resolve complaints;
- To provide personalized recommendations based on buying behaviour, if you accepted cookies;
- To communicate with you in the course of our activities, for the purposes of internal quality assurance or to manage the quality of the information provided;
- To detect and prevent fraud;
- For statistical and accounting purposes (in these cases, personal information is aggregated and anonymized);

- To inform you of news, updates, information and special offers concerning our products and services, in accordance with anti-spam legislation and with your express consent as required;
- If we have reasonable grounds to believe that it might be useful as part of the investigation of a violation of applicable federal, provincial or foreign law or to ensure the protection or defence of a legal interest;
- To administer your account or services, including reward programs, draws and contests;
- As required or permitted by applicable laws.

In addition to the purposes described above, we will inform you of other purposes for which your personal information is collected when it is collected at the latest.

If we intend to use the personal information we have collected for purposes not previously communicated, we will ask for your separate consent before doing so, unless applicable laws allow us to do so without your consent.

What technology we use to identify, locate or profile people

We may use cookies. Cookies are fragments of information sent to your computer or mobile device when you view a website. They are saved, temporarily or permanently, on your computer's or mobile device's hard drive, leaving a record of your visit. Every time you go to a website, a cookie can be created and stored, which allows us to "recognize" you each time you consult the website.

Cookies that allow you to be identified, located or profiled are deactivated by default. You must first accept them. You may refuse such cookies, but if you do, some functionality will not be available.

Cookies can allow us to analyze your personal preferences, interests or your behaviour when you browse the Internet. They help us to improve your online experience by recording your navigation preferences, analyze the operation of our websites, perform statistical analysis and recommend content to you.

Without limitation, we use the following cookies:

Cookie	Purpose	Duration
.ASPXAUTH	Session ID	Session
ASP.NET_SessionId	Session ID	Session
EasyEcomAdmin.ASPXAUTH	Session ID for admin	Session
MerchantsLocked	Used for multi-database setup	Session
OrderId	Shopping cart ID	1 year
ProductListing_DisplayMode	Display choice for product listing	Session
ProductListing_EnterBy	Used for product listing on the Frequently Ordered Products page of My Orders/All Orders	Session
ProductListing_ResultPerPage	Number of results per page in product listings	Session
ProductListing_SortBy	Sort order of product listing	Session
UserResultPerPageAddressSearch	Address listing (My Account)	1 year
UserResultPerPageCreditCardSearch	Credit card listing (My Account)	1 year
UserResultPerPageOrderSearch	Number of results per page in order tracking	1 year
UserResultPerPageUserSearch	Number of results per page in user search	1 year
UserSessionId	Session ID	1 year
__atuvc	Cookie used by the AddThis component	1 year
kLng	Site display language	1 year
visited	Used to detect a session's first access to the site so as to redirect to the home page in the user's browser language	Session
_ga	Google Analytics	2 years
_gat	Google Analytics	Session
_gid	Google Analytics	1 day

We will ask beforehand if you accept or refuse cookies, if such cookies allow you to be identified, located or profiled.

Many major websites use cookies. Most web browsers are set to accept cookies by default. At your preference, you may modify your browser settings to receive a notification when a cookie is received or to refuse all cookies.

While you are not required to accept cookies, it is possible that certain website functionalities may not work properly if you refuse cookies. Consult the following link for an overview of how to disable or delete cookies in current browsers: <https://www.allaboutcookies.org/>.

Is it possible to refuse the collection of personal information

You can refuse to consent to the collection of your personal information. However, doing so could limit our ability to offer you services or sell you products. If you withhold such consent, we will not deny you products or services unless they cannot be provided without such collection. Thus, consenting to our use of your personal information for secondary purposes (such as marketing) is not required.

Do we collect personal information about minors

It is our intention to comply with all applicable laws regarding children's privacy and advertisements that target them. We do not seek to collect personal information about minors under 14 years of age without the verified consent of the person having parental authority or a tutor. However, if you believe that we do so, please let us know. If we wish to collect personal information about minors under 14 years of age, we will obtain consent directly from a person having parental authority or a tutor, in accordance with applicable laws.

Do we take decisions based on automated processing of personal information

It is not our intention to take decisions exclusively based on an automated processing of your personal information.

Who can access personal information inside and outside the Corporation

Your personal information is disclosed only to our authorized employees who have a business need to access it, for example: our customer service centre, billing department and personnel responsible for providing products and services to our customers. These employees can only access the personal information they require to perform their job functions.

We will only disclose to third parties personal information about you (the type of personal information disclosed is situation-dependent) in the following situations:

- You have authorized us to disclose the information to a third party for a specific purpose;
- The third parties are acting on our behalf as agents or service providers (for example, information technology service providers, hosting providers, marketing solution providers, transportation and shipping providers handling products you order from us and our affiliates with whom we share services, infrastructure, systems and technology), and the information is disclosed to them only in that context, it being understood that these third parties must respect strict contractual terms that oblige them to maintain the privacy of all information, to use it only for the purposes of providing the services and to not keep the information after the expiry of the agreement;

- If a person is acting as your representative or if we reasonably believe that the person has appropriate authorization to act (for example as tutor, holder of parental authority, etc.), or is a person who owns a service or product jointly with you;
- To satisfy legal requirements;
- If we are required to provide personal information in response to a legitimate court order, subpoena to submit documents or investigation by authorities or as otherwise required by applicable laws;
- If the Corporation sells its business or assets, in whole or in part, or is involved in a merger, as required by such a transaction, or as part of due diligence;
- As required or permitted by applicable laws.

What are the roles and responsibilities of personnel with access to personal information

We have informed our employees of their obligation to preserve the privacy of personal information, and we continue to raise awareness about its importance. Our employees can only use personal information pursuant to the terms of this Policy and our other policies.

We have established the roles and responsibilities of our personnel throughout the life cycle of the personal information we hold, from collection to destruction, in a personal information governance and handling policy.

How we safeguard personal information

We have implemented reasonable physical, technical and administrative security measures to protect personal information from being lost or stolen, or from being accessed, disclosed, copied, used or modified without authorization. The nature of these security measures varies by the sensitivity, quantity, distribution and format of the personal information collected, as well as by the storage methods used. These measures include:

- Physical measures, such as locked rooms;
- Technical measures, such as firewalls and a SSL encryption key;
- Administrative measures, such as adopting an information security policy.

Where we store personal information and do we communicate personal information outside of Québec

Depending on the nature of the personal information, it may be stored in our offices, as well as in the various computer systems in our offices, in our storage facilities, or in those of our service providers.

Your personal information may be communicated outside of Québec or Canada, for the purposes described above, including its collection, use, disclosure and storage.

How long we keep your personal information

We retain the personal information we collect for as long as required for the fulfilment of identified purposes, as long as it is reasonable to do so for customer service, legal or commercial reasons. The retention period depends on the purposes and the nature of the

information. On the expiry of this period, we permanently and securely destroy or anonymize the information in compliance with applicable legislation.

What are the rules for third party websites, applications and social media sites

Our websites and applications can contain links to third party websites or applications (collectively, “**Third Party Sites**”). By using such links, you will leave our website or application. We provide these links as a convenience. We are not responsible for the privacy practices of Third Party Sites, which are not under our control. Consequently, any personal information transmitted through Third Party Sites is subject to the privacy policy of those Third Party Sites. It is your responsibility to review those policies to ensure your personal information is protected.

We may use Third Party Sites of social media sites (such as Facebook, LinkedIn and Instagram). Our social media accounts are public and we do not operate the sites that host them. If you decide to interact with us through one of these social media sites, you must first review their privacy policy.

The personal information provided to us through social media accounts is collected to capture conversations (for instance, questions and answers, comments, “Likes,” and shared tweets) between us and you. It may be used to respond to requests, carry out analyses or create reports and for all other purposes set out in this Policy.

What are your privacy rights and how to exercise them

Subject to the limits and provisions of applicable laws, you have the right to:

- Consult your personal information;
- Rectify or update your personal information;
- Withdraw your consent at any time (the withdrawal of consent is binding for us with regard to the personal information the use of which was based on such consent; the withdrawal of consent will not affect the lawfulness of use based on your consent before its withdrawal);
- Request the deletion of your personal information if it is outdated or not justified for the purposes it was collected.

If you submit a request to withdraw your consent to use, communicate and store your personal information, how we handle that request will depend on the situation and reasons. Depending on the situation:

- You may withdraw your consent, but we will no longer be able to provide you a service or product that requires such consent;
- You may not withdraw your consent because processing your personal information is necessary or mandatory.

In either case, we may be legally required to retain certain personal information.

You may exercise the foregoing rights at any time by contacting our Privacy Officer (see below).

Any such request must contain sufficient details for us to be able to address it. We undertake to respond to any such request within a reasonable period of time, and to the extent possible,

within a maximum of thirty (30) days, as set out in the applicable laws. We must, however, first verify the identity of the person making such a request.

We will ensure that your personal information is as accurate, complete and up-to-date as possible for the purposes for which it is used. However, it is your responsibility to advise us of changes to your personal information, such as your contact information.

What is our complaint process regarding the protection of personal information

You may file a complaint with our Privacy Officer (see below) if you believe that we are not complying with our obligations to protect personal information. We will confirm receipt of your complaint, contact you for more information as needed, conduct a confidential investigation and share its conclusions with you. If your complaint is justified, we will take appropriate measures to correct the situation. If you are unsatisfied with our internal review of your complaint, you can contact the following organizations responsible for the protection of personal information: the Office of the Privacy Commissioner of Canada (federal), Québec's Commission d'accès à l'information, the Office of the Information and Privacy Commissioner for British Columbia or the Office of the Information and Privacy Commissioner of Alberta.

Who to contact for privacy questions and who is our Privacy Officer

The person exercising the highest authority within the Corporation has delegated the role of Privacy Officer (also known as the person in charge of the protection of personal information) to the Vice-President, Human Resources, who you may contact at: daniel_diraddo@sprcanada.com.

You can contact our Privacy Officer to exercise your rights, ask questions about our personal information practices or file a complaint about the protection of personal information.