

PRIVACY POLICY (SUMMARY)

As a result of a business decision, this policy applies to the Personal Information of employees and candidates of Nortera Foods Inc. (hereinafter “Nortera”) located in Canada or the United States.

Why do we collect your Personal Information?

	Candidates	Employees
• To analyze your application, facilitate your hiring or contact you for other offers with your consent	X	
• To communicate with you	X	X
• To manage the monetary benefits associated with your employment		X
• To comply with our policies	X	X
• To protect our interests	X	X
• To achieve our business objectives	X	X

How do we obtain your consent?



If after reading **this policy** you choose to provide us with your Personal Information, we will assume that you consent to the collection, use and communication of your Personal Information.



Should we wish to use your Personal Information for a **purpose that is not indicated** in this policy or not governed by law, we will ask for your consent before using the information for such new purpose.

With whom do we share your Personal Information?

We may share your Personal Information outside Quebec or your province of residence, in particular for:

	Candidates	Employees
• website hosting	X	X
• human resources software	X	X
• insurance and mutual insurance plan management		X
• security camera and building door access database management	X	X
• payroll and time tracking management		X
• IT assistance		X
• financial audits		X

Candidate and Employee Privacy Policy

What rights do you have regarding your Personal Information?

At any time, you are entitled to:



Withdraw your consent to the collection, use or communication of your Personal Information.



Request **access** to or the **rectification** of your Personal Information.

TO FIND OUT MORE

Nortera values your privacy and undertakes to protect your Personal Information.

This policy describes how we collect, use, share and protect your Personal Information and how you can exercise your rights, for example to access or rectify your Personal Information.

What is the scope of this policy?

This policy applies to Personal Information of employees and candidates, located in Canada or the United States, that is under Nortera's control, whether it is retained by Nortera or a third party.

What do the terms used mean?

"Applicable Privacy Laws" means any laws, regulations, recommendations or notices that apply to privacy matters, including the *Act respecting the protection of personal information in the private sector* and any other laws, regulations, recommendations or notices that replace, supplement, amend, extend, re-enact or codify applicable privacy laws in Canada.

"Employee" means any individual employed by Nortera, including any trainee, student or agent, on a full-time or part-time, permanent or temporary basis.

"Candidate" refers to any individual applying for a job with Nortera.

"Personal Information" means any information that relates to an individual and makes it possible to directly or indirectly identify that individual, such as a name, employee number, social insurance number (SIN), online tracking identifier, such as an IP address, or one or more specific characteristics relating to the physical, physiological, mental, economic, cultural or social identity of that individual.

Why do we collect your Personal Information?

We will only collect, use and share Candidate and Employee Personal Information in accordance with Applicable Privacy Laws. For example, we will only use your Personal Information for purposes for which we have obtained your consent, or for other purposes that may be required or permitted by law.

To learn more about why we collect your Personal Information, please read the following.



Candidate and Employee Privacy Policy

<p>To facilitate the hiring process</p>	<p>To communicate with you</p>	<p>To manage monetary employment benefits</p>
<p>This includes:</p> <ul style="list-style-type: none"> • Checking references provided by a candidate • Performing background checks • Conducting pre-employment assessments that are reasonably necessary to perform the work • Conducting interviews with potential Candidates for a position • With your consent, contacting you with other job offers that may be of interest to you 	<p>This includes:</p> <ul style="list-style-type: none"> • Facilitating communication with Employees and Candidates • For Employees, facilitating communication with family members in an emergency or any other situation that may arise and require contacting family members • We will always try, wherever possible, to collect Personal Information of Employees and Candidates directly from the individual in question, and will only collect Personal Information from other sources, if necessary, with their consent. 	<p>This includes:</p> <ul style="list-style-type: none"> • Hours worked, wages or salary, in order to determine base wages or salary • Communication with third parties, including payroll or benefits service providers, insurers, actuaries, pension plan administrators, trustees and various government departments, as required by law • Internal administration of benefit plans



<p>To comply with our policies</p>	<p>To protect our interests</p>	<p>To achieve our business objectives</p>
<p>This includes:</p> <ul style="list-style-type: none"> • Sharing Personal Information with external service providers that help us manage such information, government services or 	<p>This includes:</p> <ul style="list-style-type: none"> • Using various monitoring and control systems for security purposes, including the presence of Employees, Candidates and other persons on Nortera premises 	<p>This includes:</p> <ul style="list-style-type: none"> • Collecting demographic data on Employees and Candidates to ensure the success of various Equity, Diversity and Inclusion (EDI) programs and strategies • Monitoring and promoting employee health and safety, including:

Candidate and Employee Privacy Policy

- any person required by law
- Conducting pre-employment assessments and/or psychometric tests
- Complying with legal and regulatory requirements
- For example, automated card access systems can record information on when Employees enter and leave Nortera premises, and on their working hours.
- Using video surveillance cameras on Nortera premises
- Administering disability benefits for the purposes of administering duty to accommodate decisions, determining continued employment or the ability to safely return to work, or identifying workplace hazards
- Using and possibly sharing medical information, including with medical consultants, disability consultants, government parties or financial institutions
- Having medical examinations conducted, where necessary

Candidate and Employee Privacy Policy

How do we obtain your consent?



- We collect, use and share your Personal Information with your consent or as permitted or required by law. The **way** in which we obtain your consent (or the means used to obtain it) depends, among other things, on the **circumstances** and the **sensitive nature** of the information collected.
- Your consent may be **express** or **implied**, depending on the circumstances and the sensitive nature of the Personal Information in question.
- If you choose to provide us with Personal information, we will assume that you consent to the collection, use and communication of your Personal Information to the extent described in this policy.
- Generally, we will ask for your consent at the **time at which we collect** your Personal Information.
- Should we wish to use your Personal Information for a **purpose that is not indicated** at the time of collection or not governed by law, we will ask for your consent before using the information for such new purpose.
- If you provide us with Personal information about **another person** (e.g. emergency contact), **you are responsible** for obtaining their consent to allow us to collect, use and share their information in accordance with this policy.
- We may collect your Personal Information **from third parties** (e.g. information obtained from references, criminal records), with your consent.
- You may **withdraw your consent** to the collection, use or communication of your Personal Information at any time by contacting us using the contact information provided in the **How to contact us** section below.
- However, before acting on your request to withdraw your consent, we may require **proof of your identity**. In some cases, withdrawing your consent may mean that we will no longer be able to process your application or maintain the employment relationship.

What Personal Information do we collect?

We may collect the following Personal Information:

- Name
- Postal and email address
- Telephone number
- Date of birth
- Gender
- Social insurance number (SIN)


Candidate and Employee Privacy Policy

- Resume and references
- Qualifications and skills
- Performance evaluation
- Work record
- Legal documents relating to employment
- Medical documents
- Educational documents, such as licenses and certificates
- Driver’s license, if employment duties require driving or as identification for a background check
- Background check results
- Banking information, for payment of wages or salary
- Marital status
- Name and date of birth of spouse and/or dependents, if any
- Employee photograph
- Geolocation
- Browsing history, search history, or information about your interaction with a website or application using computer equipment provided by the employer

With whom do we share your Personal Information?

We may share your Personal Information with third parties or service providers for the purposes set out above or as otherwise set out in this policy.

We will not sell or rent your Personal Information to third parties nor trade Personal Information with third parties. However, we may share Personal Information where permitted or required by law, or as described below.

<p>Service providers</p> 	<p>We may call upon service providers to perform services on our behalf. We provide these service providers with only the Personal Information required to perform the services entrusted to them.</p> <p>We inform them that they are prohibited from using Personal Information for any purpose other than the performance of the services for which they have been hired. These service providers are not authorized to share such Personal Information with other persons. We will endeavour to protect Personal Information shared with third parties by entering into contractual agreements and, where necessary, written undertakings requiring them to apply reasonable confidentiality and security practices, procedures and measures.</p> <p>The categories of service providers having access to your Personal Information include service providers hired to perform:</p> <ul style="list-style-type: none">– payroll and time tracking management– insurance and mutual insurance plan management– database management for security cameras and building door access
---	---

Candidate and Employee Privacy Policy

- IT assistance
- financial audits
- human resources software
- website hosting

If you would like more information about our service providers, please contact us by following the instructions provided in the **How to contact us** section.

To the extent permitted or required by law



We may share Personal Information where required by law, regulation, court order, subpoena, valid request or search warrant, or in response to a government investigation or other legitimate request.

We may also share such information with our accountants, auditors, agents and lawyers to enforce or protect our rights. In addition, we may share certain Personal Information when we reasonably believe it necessary to do so to protect the rights, safety or property of Nortera or other persons, to the extent provided or permitted by law.

To make a contract effective and for other legal purposes



We may share Personal Information to conclude an agreement or for any other purpose permitted by law, to the extent applicable and necessary.

Commercial transaction



We may share Personal Information with a third party as part of a reorganization, merger, sale, joint venture, assignment or other disposition of all or part of our business, brands or other assets.

That said, should such a transaction go through, Personal Information will continue to be protected by Applicable Privacy Laws. Should such a transaction not go through, we will demand that the other party to refrain from using or sharing your Personal Information in any way and to completely destroy it.

What do we expect from you as an Employee?

We will ensure that the Personal Information that we collect, use or share about our Employees is as accurate, up to date and complete as possible.

Candidate and Employee Privacy Policy

Insofar as you provide us with Personal Information, we assume that such information is accurate and up to date. Should any of your Employee Personal Information change during the course of your employment with us, we also expect you to inform us of these changes so that we may update your employment record.

How long do we retain your Personal Information?

We will retain your Personal Information in accordance with our business and legal obligations and only for as long as is necessary to fulfill the purposes identified in this policy, unless a longer retention period is required by law.

Should you be hired, we will generally retain your Personal Information on file for the duration of your employment plus three (3) years, unless we are required by law to retain it longer.

Should you not be hired, we will generally retain your Personal Information for three (3) years after the decision has been made, unless we are required by law to retain it longer. Similarly, if you authorize us to contact you for subsequent job offers, we will retain your Personal Information for three (3) years after the decision has been made.

If we use Personal Information to make a decision that directly affects a Candidate or Employee, we will retain the information for a reasonable amount of time after using it and for at least one (1) year after making the decision. In other cases, we will destroy Personal Information, or in some cases make it anonymous, when we no longer need it for the purposes for which it was collected or for other purposes where permitted by law.

Where do we store your Personal Information?

We currently store the Personal Information of Employees and Candidates in Canada. Where necessary, information may be held and used in any country in which we use third-party service providers. As a result, we may share Personal Information in countries other than your country, province or state of residence, where privacy laws may differ.

Should your Personal Information be used outside your country or province of residence, it will be subject to the laws of the country, province or state in which it is located and may be shared with the governments, courts, law enforcement agencies or regulatory bodies of that other country, or communicated in accordance with the laws of that country. However, our practices regarding your Personal Information will always be governed by this policy and Applicable Privacy Laws.

What rights do you have regarding your Personal Information?

Wherever possible, we will ensure that your Personal Information is accurate, complete and up to date. However, we will not systematically update your Personal Information. We expect you to provide us with updates to your Personal Information from time to time, as necessary.

We may ask you to provide proof of identity before responding to your request to access or rectify Personal Information. Such identifying information will only be used for this purpose.



Candidate and Employee Privacy Policy

Right to access and to rectify information	Right to withdraw consent	Right to request information on automated decision-making
<p>You may request access to the Personal Information that we have about you and obtain copies.</p>	<p>You may withdraw your consent to the communication or use of the Personal Information collected.</p>	<p>Where applicable, you are entitled to request information on the use of any fully automated decision-making system and the impact that it may have on you.</p>
<p>Should any of your Personal Information be inaccurate, incomplete or ambiguous, or if its collection, communication or retention is not authorized by law, you may request that it be rectified.</p>	<p>[You may also request that your Personal Information no longer be communicated.]</p>	
<p>You may also ask us for information on how your Personal Information was collected from you, along with the names of the persons who have access to your information within Nortera and details on how long it was retained.</p>		

To exercise your rights, please send a written request along with proof of identity to our Privacy Officer as indicated below in the **How to contact us** section.

Once your request has been sent, we will provide you with a written response no later than thirty (30) days from the date of receipt of your request at the contact information indicated above.

In some cases, we may refuse to provide you with the Personal Information you request, or we may redact or black out certain information from the documents we provide to you.

How do we protect your Personal Information?

We implement reasonable procedures and safeguards to protect the Personal Information of Employees and Candidates under our control.

For example, only authorized personnel who are bound by confidentiality obligations have access to the physical and electronic files containing the Personal Information of Employees and Candidates. Personal Information of Employees and Candidates stored electronically will be adequately protected by safeguards and passwords and will be accessible only to those personnel who require access to it in order to perform their duties, in particular human resources department employees and certain authorized managers.

Candidate and Employee Privacy Policy

What about electronic monitoring?

No electronic monitoring will be done without first informing you and obtaining your consent. Thus, for management reasons and after obtaining the consent of the Employees in question, Nortera may:

- electronically monitor your telephone calls
- electronically monitor your emails
- electronically monitor your Internet use

All of the items below may be monitored:

- computers, laptops
- telephones, wireless phones
- radios
- electronic photo
- optical or biometric systems
- electromagnetic systems

Excluded from such electronic monitoring is anything to do with geolocation and maintenance, or computer system protection through the use of data loss prevention software or internet traffic monitoring software to detect malware.

Who evaluates compliance with this policy?

Our Privacy Officer will independently assess allegations of violations of this policy by reviewing practices and procedures and determine whether follow-up corrective action is necessary, including disciplinary action, up to and including termination of employment.

How to contact us

You may address any request, question, complaint or comment concerning this policy to our Privacy Officer at the following coordinates.

Privacy Officer

privacy@norterafoods.com
140 De l'Équinoxe Street
Brossard, Quebec
J4Z 0R4 Canada

Will we update this policy?

This policy is effective as of the date of update at the bottom of each page.

We reserve the right to amend this policy from time to time. When we make changes to this policy, they take effect immediately when notice of the amendment is made available to you on our website.

Candidate and Employee Privacy Policy

Revision history

Version	Date	Author	Description
---------	------	--------	-------------