

Privacy Policy

GENERAL

Transcontinental Inc. and its [affiliated entities](#) (collectively, “TC Transcontinental”, “we”, “us” or “our”) are committed to maintaining the privacy, security and accuracy of personal information under our care and control. This privacy policy (“Privacy Policy”) informs you of our privacy practices with respect to our collection, use, disclosure and otherwise processing of personal information.

ACCOUNTABILITY

TC Transcontinental is responsible for personal information under its care and control and has designated a Chief Privacy Officer who must ensure compliance with this Privacy Policy and applicable privacy laws. If you have any concerns, questions, requests or complaints about this Privacy Policy or the processing of your personal information, please contact our Chief Privacy Officer by e-mail at chiefprivacyofficer@tc.tc, or by fax at (514) 954-2802. Alternatively, you can contact our Chief Privacy Officer by mail at:

Chief Privacy Officer
Transcontinental Inc.
1 Place Ville Marie, Suite 3240
Montréal, Québec H3B 0G1
Canada

COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Types of Personal Information

The types of personal information that we collect or process from time to time in the course of operating our business and providing our products and services includes your name, physical address, telephone number, e-mail address, contact details, job function/title, financial, credit and billing information and other incidental information relating to the products or services we provide, feedback and survey responses, identification and other background verification data, employment history and other information relevant to potential recruitment or association to or with TC Transcontinental, website usage information, and other personal information provided to us.

Collection, Use and Disclosure

Personal information is collected namely through your voluntary disclosure, your use of our services or websites, your purchase of our products or services, your subscription to our publications, through our registration or subscription forms, by means of surveys, as part of any entry to a contest or other promotion, when you register for seminars or newsletters. We may also collect personal information where permitted by law or with your consent through third party agents, contractors, vendors or suppliers who provide products and services to us (“Service Providers”), through public platforms as well as through our third party business partners to whom we provide our products and services.

We may collect, use, disclose and/or otherwise process your personal information for the following purposes:

- to create and maintain client or supplier accounts.
- to provide the product, service or information you requested.
- to communicate with you regarding the products and services you order and to respond to your requests and inquiries.
- to process payments and collect unpaid accounts.
- to detect and protect against error, fraud, theft and other illegal activity.
- to better understand your needs and preferences.
- to engage in business transactions.
- to provide customer service.
- to organize and administer contests and/or surveys.
- to fulfil our legal, regulatory, or risk management obligations.
- to reorganize or make changes to our business (for example if we merge, combine or divest a part of our business).

- for recruitment purposes.
- for security or emergency preparedness purposes and to enhance workplace safety.
- for any other purpose for which you otherwise provide your consent.

Disclosure within TC Transcontinental

TC Transcontinental has operations namely in Canada, the United States, Latin America, the United Kingdom and New Zealand and, as such, any personal information that we collect may be shared with and processed by any entity within the TC Transcontinental group in order to better serve you or as otherwise necessary for the purposes described in this Privacy Policy. We take reasonably necessary steps to ensure that your data is treated in an appropriate and secure manner and in accordance with this Privacy Policy, subject, however, to the legal requirements of the relevant foreign jurisdiction.

Disclosure to Service Providers

We may also share personal information with certain third parties such as Service Providers acting on our behalf for the purposes described in this Privacy Policy. Note that some of our Service Providers who process or have access to personal information on our behalf may be located in a foreign jurisdiction. A list of such jurisdictions can be made available upon request to our Chief Privacy Officer, on a case-by-case basis. You consent to the transfer of personal information to countries outside your country of residence, which may have different data protection rules than in your country of residence. While such information is outside of your country of residence, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

We take reasonably necessary steps to ensure that your data is treated in an appropriate and secure manner and in accordance with this Privacy Policy, subject, however, to the legal requirements of the relevant foreign jurisdiction.

Disclosure in Business Transactions

TC Transcontinental may be involved in the sale, merger or restructuring of some or all of our business or assets. In the course of such transaction, TC Transcontinental may disclose your personal information to the purchaser or new corporate entity. In such case, TC Transcontinental will require such third parties to agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy and in accordance with applicable privacy laws.

We ensure that your personal information is used and disclosed as provided for in this Privacy Policy, unless we have obtained your consent for any other purposes, or as otherwise required or permitted by applicable laws.

OUR WEBSITES

TC Transcontinental sometimes collects personal information through its various websites. In this section, we provide you with additional information regarding such collection.

Cookies

By using a web browser feature called a "cookie", TC Transcontinental and our third-party Service Providers may gather information when you visit our websites such as data about the frequency of your visits to our websites, the duration of your visits, the number of pages you view and the type of web browser and operating system you use. A cookie is a small text file containing a unique identification number that identifies the visitor's web browser, but not necessarily the visitor, to our computers each time our websites are visited.

In addition to the identified purposes described in this Privacy Policy, we may use information obtained from our websites and share it with other organizations with whom we have a commercial relationship to measure the use of our websites and to improve the functionality and content of our websites. TC Transcontinental and our third party Service Providers may also use cookies and invisible web beacons to deliver interest-based advertisements that are relevant and targeted to the visitors of our websites.

You can manage your cookies by installing a third party program or by configuring your web browser. Most web browsers are initially set up to accept cookies; however, you can delete or disable cookies by modifying

your settings. If you decide to disable cookies on our websites, you may not be able to take full advantage of all website features once you have done so.

Online Communications

If you are known to TC Transcontinental as a registered user of an online service that we offer, we may combine and store information about your use of our websites and the online information that you have provided us with along with other online and offline information we may have collected.

Searches

For your convenience, search functions are sometimes provided on our websites. We keep records of the words searched to learn more about what kind of information our visitors are seeking, and thus improve our products and services.

Hyperlinks

For your convenience, TC Transcontinental's websites may contain hyperlinks to websites operated by third parties. When you click on one of these hyperlinks, you will be transferred from TC Transcontinental's websites and be connected to a third party site, which may have different privacy policies and practices in place. This Privacy Policy is no longer applicable when you leave our websites. You should consult the privacy policies of these other entities before providing any personal information on their websites. TC Transcontinental is not responsible, nor do we accept any liability, for the personal information collection, use and disclosure practices of other entities to which our websites may link.

SECURITY AND RETENTION

TC Transcontinental has implemented reasonable security measures to safeguard the personal information under our care and control. Any personal information maintained by TC Transcontinental is archived in a reasonably secured environment based on the nature of the information. TC Transcontinental limits the collection and use of personal information to that which is necessary for the purpose(s) identified by TC Transcontinental unless otherwise required or permitted by law. Credit card information is processed using industry-standard encryption technology. Any credit card information submitted to TC Transcontinental will be used only to complete the purchase and arrange for shipping (where applicable) and/or for credit verification purposes (where applicable).

Only authorized employees, agents, partners and Service Providers may have access to personal information under our care and control. We instruct all of our authorized employees, agents, partners and Service Providers who have access to personal information under our care and control to use appropriate privacy and security precautions when processing such information.

Personal information is retained as described in this Privacy Policy, and otherwise in accordance with our record retention policies. Our record retention periods are established taking into account requirements of privacy laws, the purposes for which the information was collected, legal and regulatory requirements to retain the information for minimum periods, limitation periods for taking legal action, and our business purposes.

ACCURACY, ACCESS AND OTHER RIGHTS

We use reasonable efforts to ensure that your personal information is kept as accurate, complete and up-to-date as possible. We do not routinely update your personal information, unless such a process is necessary. In order to help us maintain and ensure that your personal information is accurate and up to date, please inform us as soon as possible of any changes to your personal information so that we can update our records.

If you wish to request access to, or correction of, your personal information that is in our care and control, please make your request in writing to our Chief Privacy Officer at the address or numbers above. All requests to access information or change information will be treated in accordance with applicable law.

Under certain circumstances and in accordance with applicable data protection laws, you may also have the right to object to our use of your personal information, to request the deletion of your personal information or restrict its use, to request a copy of the information you have provided to us to use for your own purposes, contest any automated decision made where this has a legal or similar significant effect and ask for it to be reconsidered, where we are processing personal information with consent, withdrawal of consent in the

circumstances permitted by law, or to make a complaint with a data protection supervisory authority. If you have any questions about these rights, or you would like to exercise any of them, please contact our Chief Privacy Officer.

UPDATES TO THIS PRIVACY POLICY

TC Transcontinental reserves the right to make changes to this Privacy Policy at any time. All such changes will be posted on TC Transcontinental websites, which will be effective immediately upon posting. We recommend that you review this Privacy Policy from time to time to obtain the current version. You may contact our Chief Privacy Officer at the addresses or number above to obtain a current copy of this Privacy Policy.

This Privacy Policy was last updated on August 30, 2023.