



## Privacy Policy

*Last revised: December 19, 2023*

Kruger Inc., including all of its affiliates and subsidiaries (collectively “Kruger” or “we”), are committed to maintaining the accuracy, security and privacy of Personal Information in accordance with applicable legislation. This Privacy Policy is a statement of principles and guidelines concerning the protection of Personal Information of our clients, service providers and other individuals (“you”). This Privacy Policy applies to any Personal Information that we collect, use, and disclose (collectively “process”) about you, including through the websites that are owned and/or operated by Kruger, and through telephone, written, and in-person interactions.

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### **1. Consent**

By submitting personal information to Kruger or its service providers and agents, you agree that we may collect, use and disclose such personal information in accordance with this privacy policy and as permitted or required by law.

Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the purposes identified in this Privacy Policy at any time by contacting Kruger’s Chief Privacy Officer. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you. If you provide Kruger or our service providers and agents with personal information of another individual, you

represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

Our services and websites are not targeted or directed at children under the age of 16. No one under age 16 may use the services or provide any personal information to our websites. We do not knowingly collect personal information from children under the age of 16. If you believe we might have any information from or about a child under 16, please contact us using the contact details as provided in the “Contact Us” section below. We will take steps to delete that information as soon as possible.

## 2. What Personal Information do We Process?

Personal information means any information which relates to a natural person and allows that person to be identified directly, or indirectly in combination with other information (hereinafter, “Personal Information”). It does not include information from which all references to the identity of the relevant individual have been removed (i.e., anonymous personal information).

Without limitation, any of the following categories of information (which may constitute personal information) may be collected by us:

- **Identity information:** includes name, date of birth, gender, job title, profession, username and password;
- **Contact information:** includes email, address, postal code and telephone numbers;
- **Purchase information:** includes information about products/services you have purchased in the past including the date of your purchase and the price paid and information about products/services that you prefer or that interest you;
- **Financial information:** includes credit/debit card or account information and information about credit worthiness;
- **Technical information:** includes internet protocol (IP) address and geolocation information, web browser type and version, operating system and/or device, cookies and other technology on the devices you use to access this web site;
- **Internet activity information:** includes session information, such as page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page; and
- **Information about your career profile:** includes information about your history of applications for a position at Kruger, information about the person that referred you for a position at Kruger, your status as a Kruger employee, the legal status that allows you to work in Canada, your résumé and other information you choose to add to your profile on one of our career platforms.

## 3. How do We Collect Your Personal Information?

We may use different methods to collect personal information from and about you including through:

- Direct interactions. You may give us personal information by corresponding with us or by using our services, including without limitation our web site’s features and services. This includes personal information you may provide if you:
  - Sign-up for a user account on our web site and update such user account;
  - Contact us through telephone, mail, email, social media, or a chat-box on our web site;
  - Input or upload any Personal Information through one of our web sites; and
  - Subscribe to our newsletter, respond to a survey, fill out a form, participate in a sweepstakes, or otherwise input or upload information or files through our website, by telephone, or in person.
  
- Automated technologies or interactions. As you interact with our web site, we will automatically collect technical information and internet activity information about your equipment and browsing actions and patterns. We collect this information by using cookies, pixels, server logs and other similar technologies. We may also receive technical information about you if you visit other web sites employing our cookies.

**4. Why do We Process Your Personal Information?**

In general, Kruger processes Personal Information in order to provide you with services related to your purchase of products, and about applicants for positions with Kruger for the purpose of evaluating the application and deciding whether to establish (and subsequently to manage or terminate) an employment, contractual relationship or partnership. More specifically, we process your Personal Information for the following purposes:

Purpose	Category of personal information
Establish and manage customer relationships, perform services and fulfill our duties. This includes developing, enhancing, marketing, selling or otherwise providing Kruger’s products and services, and understanding and responding to customer, supplier and other third party needs and preferences, such as to contact and communicate with those parties and to conduct surveys, research and evaluations. This may also include the sharing of Personal Information by and between Kruger personnel and affiliated companies and partnerships for such purposes.	<ul style="list-style-type: none"> <li>- Identity information</li> <li>- Contact information</li> <li>- Purchase information</li> <li>- Technical information</li> </ul>
Consider whether Kruger should establish a commercial relationship with customers, suppliers and other third parties, including to evaluate credit standing and to match credit bureau or credit reporting agency information. This includes establishing and maintaining	<ul style="list-style-type: none"> <li>- Identity information</li> <li>- Contact information</li> <li>- Purchase information</li> <li>- Technical information</li> <li>- Financial information</li> </ul>

commercial relationships with customers, suppliers and other third parties, including to issue invoices, administer accounts, collect and process payments, and to fulfill contractual obligations.	
Establish, manage and terminate employment, contractual and partnership relationships.	<ul style="list-style-type: none"> <li>- Identity information</li> <li>- Contact information</li> <li>- Technical information</li> <li>- Information about your career profile</li> </ul>
Distribute Kruger's newsletters and other informational e-mail communications, and other material to individuals on our mail and e-mail lists, including via third party mailing houses and e-mail service providers.	<ul style="list-style-type: none"> <li>- Identity information</li> <li>- Contact information</li> </ul>
Detect and protect Kruger and other third parties against error, negligence, breach of contract, fraud, theft and other illegal activity, and to audit compliance with Kruger's policies and contractual obligations.	<ul style="list-style-type: none"> <li>- Identity information</li> <li>- Contact information</li> <li>- Purchase information</li> <li>- Financial information</li> <li>- Technical information</li> <li>- Internet activity information</li> <li>- Information about your career profile</li> </ul>
Engage in business transactions, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving Kruger.	<ul style="list-style-type: none"> <li>- Identity information</li> <li>- Contact information</li> <li>- Purchase information</li> <li>- Financial information</li> <li>- Technical information</li> <li>- Internet activity information</li> <li>- Information about your career profile</li> </ul>
As permitted by, and to comply with, any legal or regulatory requirements or provisions, and for any other purpose to which you consent.	<ul style="list-style-type: none"> <li>- Any other Personal Information, as permitted or required by applicable laws.</li> </ul>

**5. To Whom do We Disclose Your Personal Information?**

From time to time, Kruger may disclose your Personal Information to:

- service providers, including an organization or individual retained by Kruger to perform functions on its behalf, such as marketing, data processing, document management and office services;
- an organization or individual retained by Kruger to evaluate your creditworthiness or to collect debts outstanding on an account;
- a financial institution, on a confidential basis and solely in connection with the assignment of a right to receive payment, the provision of security or other financing arrangements;

- a person who, in the reasonable judgment of Kruger, is providing or seeking the information as your agent;
- to our insurers and to regulatory agencies such as insurers or others in connection with regulatory or other activities relating to the obligations of Kruger;
- to personnel in Kruger, government authorities, insurers, benefits providers, consultants or agents as reasonably required to establish, manage or terminate employment, contractual relationships and partnerships;
- to an acquiring entity in connection with the consummation or proposal of a business transaction (including liquidation, realization, seizure or repossession), concession, merger, business combination or any other type of acquisition, liquidation, transfer, translatable contract or financing of Kruger, in whole or in part, or of any property, stock, asset, share or business of Kruger; and
- any third party or parties, where you consent to such disclosure or where disclosure is required or permitted by law.

By providing us with personal information, you acknowledge and agree that such personal information may be transferred to other jurisdictions for processing and storage, including in servers located across Canada and in the United States, where laws regarding the protection of personal information may be less stringent than the laws in your jurisdiction. Further, such personal information may be accessible to law enforcement, national security authorities, and the courts of such jurisdictions. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the personal information.

## **6. Your Rights**

Subject to certain exemptions, to the extent permitted by applicable law, you have the following rights in relation to the personal information we hold about you:

- Your right of access. At your written request we will inform you whether we hold personal information relating to you and if we do, you have the right to receive a general account of our processing of such personal information. If your request is made in writing, subject to applicable laws and the provisions of this Privacy Policy, we will also provide you with access to your personal information that is in our possession. A reasonable fee may be levied if you request the transcription, reproduction or transmission of such information and you will have to provide information or documentation to verify your identity. We will inform you of the approximate cost before proceeding to respond to your request. Your rights to access your personal information are not absolute. Access can be denied for several different reasons under applicable legislation. If we deny your request for access to your personal information, we shall explain why.
- Your right to rectification. If we hold personal information about you and you believe that it is not accurate, complete and up-to-date, you can request to have it rectified (or rectify it yourself via your account information page, if available). If we discover that information is not accurate, complete and up-to-date, we will take reasonable steps to rectify it. We will also send any information that has been amended, where appropriate, to any third parties that have access to the information.

- Your right to withdraw consent. If we rely on your implicit or explicit consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdrew your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## **7. How do We Protect Your Personal Information?**

To help protect the confidentiality of your Personal Information, Kruger employs physical, administrative and technological safeguards appropriate to the sensitivity of your Personal Information. Where Personal Information is sent to a third party for processing we ensure, through our contacts with them, that all Personal Information is kept secure. We operate secure data networks protected by industry standard firewall and password protection systems.

## **8. How Long Will We Retain Your Personal Information?**

We only keep personal information for as long as necessary and for the reasons it was collected, or for as long as required to comply with any applicable legal obligation and our document retention policies. The length of time personal information is kept varies according to the nature of the information, and it may extend beyond the end of the relationship between an individual and us.

When the personal information collected is no longer required by us, the necessary procedures for destroying, deleting, erasing, or converting it into an anonymous form are applied.

## **9. Our Websites**

- Cookies - When an individual visitor accesses the Kruger website, we may use a browser feature called a 'cookie' to collect information such as the type of Internet browser and operating system the visitor uses, the domain name of the Website from which the visitor came, date and duration of the visit, number of visits, average time spent on our website, pages viewed and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies the visitor's browser, but not necessarily the visitor; to our computers each time our website is visited. Unless a visitor specifically informs us (e.g. by registering for an event or sending us correspondence from the website), we will not know who the individual visitors are. In addition to the identified purposes described in our Privacy Policy, we may use this website information and share it with other organizations with whom we have a commercial relationship to measure the use of our website, to improve the functionality and content of the website and to facilitate usage by a visitor. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on our website.
- Links – Our website may contain links to other websites which are provided as a convenience only. Visitors are advised that other third party websites may have different privacy policies and practices than Kruger, and Kruger has no responsibility for such third party websites.

## **10. E-mail Communications**

Occasionally, we may send marketing or promotional e-mail communications to you with information that may be useful, including information about the products and services of Kruger and other third parties with whom we have a relationship. In this process, we may collect certain information such as the date/time you first opened our e-mail communications, the number of times you open our e-mail communications, the number of click-throughs per article, total click-through activity on the contents of our e-mail communications and compile generally the related statistics. We may combine and store any such information to manage and improve our e-mail communications to you. We will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future marketing or promotional e-mails from Kruger.

## **11. Changes to the Privacy Policy**

Kruger reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes on our website and make such revised policy and changes available upon request to Kruger's Chief Privacy Officer. However, Kruger will obtain the necessary consents required under applicable privacy laws if it seeks to collect, use or disclose your Personal Information for purposes other than those to which consent has been obtained unless otherwise required or permitted by law.

## **12. Contact Us**

For any questions or concerns about this Privacy Policy, or to exercise any of the rights that you have in relation to your personal information, please contact:

Chief Privacy Officer  
[privacyoffice@kruger.com](mailto:privacyoffice@kruger.com)  
514-343-3100  
3285 Bedford Road  
Montreal, Quebec H3S 1G5