

1. GENERAL PURPOSE

This policy is intended to inform you of the practices of Stein Monast LLP (including Steinlex Inc.) (“SM”) regarding governance and confidentiality of personal information.

Its purpose is to provide a framework for the security and protection of personal information collected, used, communicated and kept by SM and to prevent unauthorized consultation, use or communication of this information. It also aims to protect this information against any integrity breach.

In addition, this policy establishes the rules governing access to this information, its communication, its use, its keeping, its destruction as well as the rights of access, rectification and withdrawal.

2. LEGISLATIVE FRAMEWORK

- *Civil Code of Quebec (CQLR);*
- *Act respecting the protection of personal information in the private sector (CQLR, c. P-39.1) (the “Act”);*
- *Act to establish a legal framework for information technology (CQLR, c. C-1.1);*
- *Privacy Act (RSC, 1985, c. P-21);*

3. SCOPE

This policy applies to all SM employees, lawyers/notaries, partners, consultants, suppliers and business partners (the “Users”).

4. BASIS

SM recognizes the importance of privacy, security and the protection of personal information and is committed to respecting the provisions, values and principles established by all applicable legislation, including updates thereto, by implementing the policies, practices and measures necessary to ensure the protection of personal information communicated to it in the context of its business.

SM ensures that it implements the necessary physical, IT and technological security measures to protect the confidentiality of this personal information.



5. **OBJECTIVES**

The objectives of the policy are:

- Define the type of personal information SM collects;
- Define the means used by SM to protect this information;
- Specify the standards for the collection, keeping, use, communication, and destruction of this information;
- Determine the rights of access, rectification, and withdrawal of personal information by SM or a third party, regardless of the nature of its medium and the form in which it is accessible, whether written, graphic, audio, visual, computerized, or other;
- Determine the roles of the persons involved, including that of the person in charge of the protection of personal information.

6. **DEFINITIONS OF PERSONAL INFORMATION**

Any information concerning a natural person, which allows them to be directly or indirectly identified and which is not public within the meaning of the Act.

This information may include, but is not limited to:

- Contact information such as first and last name, postal address, email address, MAC address or telephone number;
- Information regarding the credit file of a natural person;
- Identification information, such as a copy of a passport, a driver's license or a health insurance card;
- Billing information such as a billing address, banking information or payment system data;
- Marketing and communication preference information such as comments or survey responses;
- Information relating to the use of the SM website, including technical information on visits or any other information collected through cookies or other similar tools;
- Recruitment-related information such as resumes (*curriculum vitae*), employment or academic background information, or any other information relevant to potential recruitment;
- Background information such as the names of former employers, titles and positions or digital content such as photos, videos or audio files;



- Any other personal information provided.

However, Divisions I and II of the *Act respecting the protection of personal information in the private sector*, which concern the collection, use, communication, keeping and destruction, do not apply to personal information concerning the performance of duties within an enterprise by the person concerned, such as the person's name, title and duties, as well as the address, email address and telephone number of the person's place of work.

7. GENERAL PRINCIPLES

SM takes appropriate security measures to ensure the protection of personal information collected, used, communicated, kept or destroyed and which are reasonable considering, among other things, their sensitivity, the purpose of their use, their quantity, their distribution and their medium, in particular by ensuring:

- The integrity of the information, so that it is not destroyed or altered in any way without authorization, that it is destroyed in accordance with SM's retention schedule and that the support of this information provides it with the desired stability and durability;
- The confidentiality of personal information, by limiting its communication to only those persons authorized to have access to it, either externally with the express consent of the person concerned or internally when this information is necessary for the performance of the employee(s)' duties;
- The identification and authentication, so as to confirm, when required, the identity of a person or the identification of a document or device;
- Compliance with legal, regulatory or business requirements to which SM is subject.

SPECIFIC PRINCIPLES FOR PERSONAL INFORMATION

8. COLLECTION OF PERSONAL INFORMATION

8.1 Collection

SM may collect the following information: first name, last name, postal address, email address, public IP address, MAC address, telephone number, credit card number, date of birth, social security number and copies of driver's license, passport or health insurance cards.

Technical data and cookies may also be collected by SM during visits to its website, such as the type of browser used, preferred language, referring site, date and time of the visit to the site. This data is collected to better understand how users use the website and to improve its performance.



8.2 Consent to collection

The collection of personal information by SM is carried out in complete transparency and with the free, prior and informed consent of the person concerned, which is obtained through one or more detailed consent forms with simple and clear terms, subject to the exceptions provided for in the Act, or through a cookie consent banner.

In accordance with applicable laws, when SM collects personal information, it requires the consent of the person concerned by disclosing in advance the purposes for which this information is collected and will be used.

SM will seek to obtain new, separate consent before using personal information held for purposes that are inconsistent with those for which it was initially collected.

8.3 Method of collection

The collection of personal information may be carried out, namely in person, via secure file/data-sharing platforms, via data management platforms (e.g. Hubspot), by email, through forms or telephone interviews.

SM collects personal information from the person concerned or from third parties, with the prior consent of the person concerned, and provides in particular, upfront and in simple and clear terms, the following information during collection and subsequently upon request, according to the consent forms appearing in Schedule A of this policy:

- The name of SM;
- The purposes for which the information is collected;
- The means by which the information is collected;
- To which third parties or categories of third parties the collected information may be communicated;
- The terms and conditions for the keeping and destruction of the information;
- The rights of access and rectification provided for by the Act;
- The right to withdraw consent to the communication or use of the collected information.
- The possibility that personal information may be disclosed outside Quebec.

Any person who provides personal information following receipt of the above information consents to its use and communication for the purposes for which such information was collected.

SM also collects data through its website, via the following technologies:



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- a) Cookies when using its website to ensure proper management and to provide a consistent, efficient and personalized experience of the website and offer some of its services.

A cookie is a small data file that is stored on the user's computer or mobile device or a cookie from related services such as Google Analytics, Google AdWords, Facebook or Hubspot. These cookies contain identifying information that allows SM to know how people interact with the services, target people with relevant offers, learn about their browsing history on the site, as well as summarize their experience using the services.

The cookies used are divided into four distinct categories:

- Necessary cookies;
 - Functionality cookies;
 - Performance cookies;
 - Tracking cookies.
- b) Login logs: Whenever someone uses SM's services through its website, the servers automatically record the login information that their browser sends while connecting to a website. These logs may contain information such as their Internet search, their IP address, their browser type and language, their Internet service provider, the date and time of their connection, the pages they visited, one or more cookies that allow their browser to be identified and the number of clicks.

To the extent required, information provided by a person as part of their use may be combined with information from other SM services or third parties such as Google Analytics, Google Adwords, Facebook or Hubspot, to improve the quality of the services. For certain services, the person can choose whether to allow the combination of this information.

If a person wishes to opt out of Google Analytics, Google Adwords, Facebook, or HubSpot advertising features, including through ad settings, mobile apps ad settings, or any other available means, they can visit the Internet to access the opt-out add-on for each of these applications. Alternatively, a person can consult one of the following resources to learn more about third-party cookie use and how to opt out: Google Advertising & Privacy and Google Ads Settings.

In any case, SM implements confidentiality settings ensuring, by default, the highest level of confidentiality.

A consent banner is automatically displayed upon landing on the SM website to allow the user to activate cookies. The performance of certain services offered on the website may be affected if the user refuses.



9. USE

SM collects and uses personal information to provide personalized and secure services to its clients, in compliance with applicable laws and security rules.

SM will use the personal information collected for any of the following purposes:

- Verify the client's identity;
- Communicate with the client;
- Provide a service or carry out a mandate in a personalized manner;
- Accept payment for professional fees and disbursements incurred;
- Share personal information with third parties when necessary to carry out the service contract or mandate;
- Provide training, send invitations to events, and offer services;
- Conduct development and research to ensure the highest security standards are maintained and to understand our client's requirements to improve our offering;
- Recruit staff, process applications, and assess the candidate's profile in relation to job requirements;
- Hire employees;
- As permitted or required, for any applicable legal or regulatory obligation or provision;
- Any other purpose to which an individual has consented;
- Assert its rights, where applicable.

SM uses the information collected and held only for the purposes for which consent was obtained. Therefore, unless specifically consented to, SM does not communicate, sell, rent, give, exchange, share or disclose to third parties any personal information held.

This information is accessible only to SM employees or agents who need it to carry out their duties and the latter are required to respect the confidential nature of this information.

10. KEEPING AND DESTRUCTION

All personal information collected, regardless of its medium, is kept in a secure environment against unauthorized access. Personal information is kept for the period necessary to fulfill the purposes for which it was collected and for SM to comply with its legal obligations. The information will then be destroyed in accordance with applicable laws.



11. SECURITY OF INFORMATION

All personal information collected, regardless of its medium, is kept in a secure environment against unauthorized access, communication, copying, use or modification, as well as against loss or theft. These security measures include, where appropriate, the use of firewalls and secure servers, encryption, the deployment of appropriate access rights management systems and processes, careful selection of processors, sufficient training for SM personnel who have access to personal information in the context of their duties, as well as other essential measures to ensure appropriate protection of personal information against unauthorized use or disclosure. SM uses information technology to support its business processes to provide better service delivery and appropriate security for the information it holds.

SM implements adequate security and access management measures to ensure the confidentiality, integrity and availability of the personal and confidential information it holds based on the sensitivity of this information, the risks to which it is exposed and the obligations to which SM is subject.

However, despite all efforts, no method of electronic transmission or storage is completely secure. Consequently, SM cannot guarantee the security of personal information transmitted to it or that such personal information will not be obtained, accessed, communicated, altered or destroyed as a result of a breach of security and protection measures.

12. COMMUNICATION TO THIRD PARTIES

SM requires the consent of the person concerned before communicating their personal information to a third party, unless applicable laws authorize the disclosure without such consent.

As part of the services offered and the collection of data through a platform (e.g. Hubspot), SM may communicate, in compliance with applicable legal requirements, personal information to its external providers located in and outside Quebec. In this case, SM's external service providers are subject to confidentiality agreements and/or legal restrictions prohibiting the use of the information communicated for purposes other than those for which SM collected it.

SM and its suppliers may be required to provide personal information held by reason of a court order, an administrative investigation or another situation provided for in any law.

As part of a restructuring of SM's activities, SM may be required to communicate personal information to potential or existing purchasers and their advisors for the purposes of said transaction.

In all cases where personal information must be transmitted to a third party, SM will ensure that it complies with the requirements of applicable laws before any communication.



13. ACCESS, RECTIFICATION AND WITHDRAWAL RIGHTS

Any person who requests it has the right to access their personal information held by SM unless otherwise provided for in applicable laws. Requests may be made through the person in charge of the protection of personal information. Unless there are serious practical difficulties, computerized personal information collected directly or indirectly from the person concerned will be provided in a structured and commonly used technology format.

A person may request that their personal information be corrected, rectified, destroyed or no longer used for the purposes for which it was collected.

Any person concerned may also, at any time, withdraw their consent to the use of their personal information by contacting the person in charge of the protection of personal information. This withdrawal of consent will only be effective for the future, upon receipt by SM. Upon receipt of the notice of withdrawal of consent, SM undertakes to cease all use of the personal information in question and to destroy it, subject to any legal or regulatory obligation relating to its conservation.

SM will also notify any person or entity to whom such personal information has been communicated pursuant to the consent obtained, so that these persons or entities may also cease its use and, if applicable, destroy it.

However, SM may not be able to fulfill its obligations in the event of a premature request to withdraw consent or destruction. In this case, SM cannot be held liable for any harm suffered by the person concerned.

14. COMPLAINTS MANAGEMENT

Any person who wishes to file a complaint regarding the collection, keeping, use, communication, destruction or rights of access or rectification to their personal information by SM must forward it to the person in charge of the protection of personal information named below. The person in charge of the protection of personal information will analyze the complaint and provide a response within thirty (30) days of receipt of the complaint.

15. DISSEMINATION OF THIS POLICY

SM publishes this policy on its website and disseminates it by any means likely to reach the persons concerned.

16. RESPONSIBILITY OF THE PERSON COMMUNICATING THE INFORMATION

Anyone who provides information to SM is responsible for ensuring that it is accurate and up-to-date.



Any person who transmits information to SM must also ensure that the system or equipment with which they transmit or receive information from SM is sufficiently secure and act diligently in this regard. SM cannot be held responsible for unauthorized access to information resulting from negligence or vulnerabilities in the equipment or system that transmits information to or receives it from SM.

If the confidentiality of their information is compromised or their identity is stolen, the person concerned is required to notify SM as quickly as possible by contacting the person in charge of the protection of personal information named below.

17. CONFIDENTIALITY INCIDENTS

In the event of an incident affecting the protection of personal information, SM will take the necessary measures to reduce the risk of harm being caused and prevent further incidents of the same nature from occurring, in accordance with the Information Security Incident Management Policy.

18. AFFILIATED SITES

Some of SM's services may be offered in connection with other websites. Personal information transmitted by a person to these sites may be sent to SM to provide the service. This information is processed in accordance with this policy. Affiliated sites may have different privacy practices, SM thus recommends that you familiarize yourself with their applicable policies and practices.

19. LINKS

SM may display links in a format that allows it to determine whether these links have been followed. This information is used to improve the quality of personalized content and ads.

20. PERSON IN CHARGE OF THE PROTECTION OF PERSONAL INFORMATION

The managing partner of SM is responsible for the protection of personal information and can be reached using the contact information available on the SM website or at the following address: confidentialite@steinmonast.ca.

21. POLICY MANAGER

The managing partner of SM is responsible for the implementation of this policy (the “**Policy Manager**”). They are also responsible for ensuring, in collaboration with the director of administration and organizational optimization, that this policy continues to meet applicable laws and SM's operational needs.



22. POLICY REVIEW

This policy will be reviewed: (i) when there is a change in SM's corporate, professional, legislative, or regulatory environment that requires a review of this policy, or (ii) when required or deemed appropriate by the Policy Manager from time to time.

Any amendment to this policy must be approved by the Board of Directors of SM to be effective.

23. APPLICATION OF THE POLICY

This written policy is effective as of August 31, 2023, and supersedes any other existing policy to the same effect.

Date of last review: July 10, 2025



SCHEDULE A

FORM

CONSENT REGARDING THE PROTECTION OF PERSONAL INFORMATION

(NATURAL PERSON)

FIRST AND LAST NAME OF SIGNATORY (BLOCK LETTERS): _____

DATE OF BIRTH: _____

1. Collected information

Stein Monast collects personal information from the client or from third parties, including their first name, last name, date of birth, postal address, email address, telephone number, credit card number or banking information, passport number, driver's license number, health insurance number or social security number and any other information relevant to the performance of the service contract and the mandate.

2. Method of collection

Collection may namely be carried out in person, via secure file/data-sharing platforms, by email, through forms or telephone interviews.

3. Purposes for which personal information is collected

Stein Monast collects personal information necessary to identify the client, communicate with them, offer a service or carry out the mandate in a personalized manner, pay invoices, offer them the opportunity to participate in training or improve the services provided.

4. Communication of personal information to third parties

As part of the mandate or service contract, Stein Monast may communicate personal information obtained to third parties in and outside Quebec, including government authorities, its own suppliers or partners, and other parties involved in the matter. In all cases, communication will be made solely for the primary and legitimate purpose for which the information was collected or for purposes compatible with that purpose.

5. Keeping and destruction of personal information

All personal information collected, regardless of its medium, is kept in a secure environment against unauthorized access. Personal information is retained for the period necessary to fulfill



the purposes for which it was collected and to ensure that Stein Monast complies with its legal obligations. The information will then be destroyed in accordance with applicable laws.

6. Right of access, rectification or withdrawal

The signatory may have access to information concerning them. They may request this in accordance with the Confidentiality and Protection of Personal Information Policy. The signatory may also request the correction or destruction of personal information. They may also withdraw this consent to the collection, use, and keeping of personal information by contacting the person in charge of the protection of personal information. Stein Monast will also notify any person or entity to whom this information may have been communicated of this withdrawal of consent.

By signing this consent, or by sending their approval by email, the person mentioned on page 1 represents that they have read and understood the above content. They also represent that they have read the summary of Stein Monast's Confidentiality and Protection of Personal Information Policy available on its website and have received the necessary support to address their questions and concerns, if any, regarding the protection of personal information.

Our mandate will begin upon receipt of this consent, duly signed or approved by email.

If more than one natural person is a client or party involved in the same mandate, each must send us this consent duly signed or approved form by email.

Date: _____

Signature

Nom