

PERSONAL INFORMATION PROTECTION AND PRIVACY POLICY

1. PREAMBLE

- 1.1. Privacy, personal information security, and respect for privacy are paramount to Broccolini, its subsidiaries, and affiliated companies ("**Broccolini**", "**we**"). We aim to protect the personal information entrusted to Broccolini in the conduct of its activities and in the operation of its businesses.
- 1.2. This Personal Information Protection and Privacy Policy ("Policy") aims to outline and establish Broccolini's practices regarding the collection, use, processing, disclosure, storage, and protection of personal information of our clients, investors, partners, employees, candidates, visitors to our offices and premises, users of our website and various social media accounts, as well as members of the general public ("you").
- 1.3. This Policy also aims to specify the role and responsibilities of Broccolini's staff in the management and protection of personal information.

2. DEFINITIONS

- 2.1. "**Personal information**" refers to information about an individual that directly or indirectly identifies them.
- 2.2. A "**privacy incident**" refers to any unauthorized access, use, or disclosure of personal information, as well as the loss of personal information or any other breach of its protection.

3. OBJECTIVES

Through this policy, we establish the practices, policies, and procedures governing how we handle personal information obtained by Broccolini, including by:

- 3.1. Implementing policies and procedures to protect the personal information under our custody and control against unauthorized access, use, or disclosure;
- 3.2. Establishing processes to respond to requests for access to information from affected individuals quickly and effectively;
- 3.3. Establishing a framework for the protection of personal information, defining the roles and obligations of our employees regarding the processing of personal information;

4. COLLECTION OF PERSONAL INFORMATION

In most cases, we collect personal information directly from individuals. However, we may also receive information indirectly, including as part of background checks for job applicants. We also collect personal information automatically on our websites, as described below.

Broccolini may collect, use, retain, and disclose personal information, including for the following purposes:

- Development and maintenance of business relationships with our clients, investors, partners, suppliers, subcontractors, and third parties;
- Directing our investments, concluding movable and immovable property transactions where personal information may be exchanged or disclosed, such as purchase, sale, and leasing operations, mergers, arrangements, or any other type of acquisition or disposal, public offerings, investment or financing operations, or other operations;
- Talent acquisition through the processing and evaluation of received applications and to fill available positions within the company;

- Administration and processing of personnel. Broccolini collects and holds personal information of its staff that allows us to fulfill our obligations as an employer;
- Compliance with our obligations regarding the health and safety of our workers;
- Compliance with our applicable legal or regulatory obligations;
- Use of our websites, applications, web forms, as well as for the distribution and publication of newsletters and publications on social networks and any other method of communication with internet users;
- Any other use underlying the achievement of the aforementioned objectives.

5. CONSENT We will obtain your consent when required for the collection, use, and disclosure of personal information. Generally, Broccolini presumes that a person consents to the collection and reasonable use of personal information voluntarily provided to us when they communicate with us.

6. DISCLOSURE OF PERSONAL INFORMATION

6.1. Internal Communication at Broccolini. Information processed by or within Broccolini is only accessible to employees who require it in the course of their duties.

6.2. Communication by You to Broccolini. Although Broccolini takes necessary measures to protect your personal information, we cannot guarantee the security of information transmitted to Broccolini by email. Any transmission of personal information by email to Broccolini is at your own risk.

6.3. Communication by Broccolini to Third Parties. Generally, Broccolini does not share your information with third parties. However, sharing your information with other parties is sometimes necessary. At all times, we undertake to limit the information to what is strictly necessary and to obtain your consent when required. We provide access to your personal information only to the extent necessary for the provision of services to us. Where applicable, we require our service providers, subsidiaries, affiliated companies, and partners to protect the confidentiality and security of personal information to the same level of protection as we offer. We may disclose your information to:

- Our subsidiaries, affiliated companies, or companies within the same group;
- Our advisors, agents, representatives, or insurers;
- In the context of legal proceedings;
- Any person authorized to obtain them under the law (i.e., public bodies, regulatory or governmental authorities);
- Third parties involved in the conclusion of a commercial transaction, including lease agreements and real estate sales;
- Third parties involved in concluding business transactions as part of asset sales, mergers, or other possible or completed corporate restructuring;
- Social media and digital platforms;
- Our professional, financial, banking operations, technology, insurance, communication, as well as analytics and marketing service providers.

7. PERSONAL INFORMATION OFFICER. A Personal Information Protection Officer ("PIPO" or "Officer") has been designated to ensure that Broccolini complies with the rules described in this policy and that the organization complies with applicable laws. The Officer is responsible for monitoring privacy-related issues. The Officer's contact information is provided in the "Contact Us" section below.

8. STORAGE AND TRANSFER OF PERSONAL INFORMATION. Information provided to Broccolini in paper format is stored and protected on our construction sites and workplaces. Digital documents are stored on our internal servers in Canada and in data centers in Canada and the United States. Our service providers (including their affiliates) and us may access, store, and process personal information outside of Quebec, including in Ontario.

9. INFORMATION ABOUT OUR WEBSITE, SOCIAL MEDIA ACCOUNTS, AND ONLINE PRESENCE

- 9.1. In principle, you can visit our website without providing your identity or any other personal information.
- 9.2. However, our website uses a technology called "cookies" and/or other similar files, such as invisible GIFs, pixel tags, or pixel beacons that collect and store information. We use the term "cookies" in this policy to refer to all files that function in this way. Through cookies, Broccolini or companies we engage to provide technology and analytics services may collect certain information, such as users' IP addresses and other related information such as pages visited, browser type, operating system, and average time spent on our website.
- 9.3. This information helps us understand and evaluate our website activity, improve user experience, and for statistical purposes. This information may also be used to analyze your behavior, make forecasts about your interests and preferences, develop personalized content, and deliver targeted advertisements.

10. **SECURITY MEASURES.** We have implemented reasonable administrative, technical, and physical measures to protect the personal information under our custody and control against theft and loss, as well as unauthorized access, use, modification, and disclosure.

11. YOUR RIGHTS

- 11.1. **Right of Access and Correction of Your Information.** You have the right to access and update your personal information, as well as to correct it within the limits provided by the law for such requests. To make such a request, please send a written request to our Privacy Officer whose contact information is provided below. These requests will be processed in accordance with the applicable privacy legislation.
- 11.2. **Right to Accept, Refuse, and Withdraw Consent.** Your information belongs to you. Subject to legislative, legal, business, or contractual requirements, you have the right to accept, refuse, and withdraw your consent to the collection, use, or disclosure of information. To make a request to this effect, please send a written request to our Privacy Officer whose contact information is provided below. These requests will be processed in accordance with the applicable privacy legislation.
- 11.3. **Retention Period.** In principle, Broccolini only retains your personal information to the extent and for the time required to fulfill the purpose for which it was collected. However, some information is retained longer in accordance with our obligations and legal, tax, and regulatory requirements.

12. **PROCEDURE FOR MANAGING PRIVACY INCIDENTS.** Broccolini has an obligation to handle any privacy incident concerning personal information it holds. When one of these situations arises, Broccolini's Privacy Incident Management Policy applies.

13. **UPDATING THIS POLICY.** We may modify and update our privacy policy as required. We encourage you to check this page periodically to familiarize yourself with these changes.

- 14. CONTACT US.** If you have any questions about this privacy policy or if you wish to request access to the personal information, we have collected about you, please contact us at the following address:

Privacy Officer

Kristen Bruno

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