Privacy Policy Agromart Group

Last update: January 10, 2025

The Agromart Group (we will refer to it as "Agromart") values your privacy and is committed to protecting your personal information.

This Policy describes how we collect, use, share, and protect your personal information when you visit our website www.agromartgroup.com and when you visit our stores in Ontario. It also explains how you can exercise your privacy rights, for example, to access or correct your personal information.

When you provide personal information according to this Policy, we assume that you agree that this information will be treated as described in this Policy.

• What is personal information?

Personal information means any information that can identify a natural person, directly or indirectly. For example, your name, address, telephone number, date of birth, IP address, browsing activities, purchase history and credit card number can be considered personal information.

Information about a business is generally not considered personal information.

• What does this Policy cover?

This Policy applies to the personal information of individuals who interact with us via our website or when visiting our stores in Ontario.

• How do we collect your personal information?

We collect your personal information when you

- provide us with personal information on our website, including by browsing on our website
- communicate with us through various means, such as email, telephone, via certain forms or in person.
- make transactions with an Agromatt (informations are extracted from invoices)

• What personal information do we collect and why?

What type of information do we collect or create?

Why do we need it?

Transaction related

- Transactional data: information related to a transaction, such as payment information and purchased products
- Client Tag: a client number is created and associated with your account
- Aggregate data on your purchase history
- Contact information: first name; last name, phone number, address and email address

- To allow you to make your purchase and process your payment
- To manage rebate programs with our partners and allow us to provide you with discounts, rebates or other privileges; and to provide our partners reports to allow them to evaluate your eligibility to the rebate programs and make the appropriate payments (see the To whom do we share your personal information? section).
- If you wish to withdraw your consent to participate in the rebate program, please contact your Agromart.
- To perform market analysis

On our website

- Loggin information
- Contact information: first name; last name, phone number, address and email address
- Usage data, such as the number of users, city, device information; session statistics, latitude (of city), longitude (of city), browser information, answers to questions, clicks, etc.
- To authenticate you
- To contact you
- To provide you with the requested product or service or answer your request.
- For the purposes described in our Cookie Policy (put hyperlink).

In general, we may also use your personal information to comply with applicable laws and fulfill our regulatory obligations, to process product complaints, to maintain our security systems and to protect our rights and the rights of others.

• How do we obtain your consent?

How we obtain your consent (i.e. how we obtain it) depends on the circumstances. Sometimes we ask for your explicit consent. However, consent may also be implied, i.e. it is inferred from the circumstances or from your silence.

If you provide us with personal information about another person, <u>you are responsible for obtaining that</u> person's consent.

To whom do we share your personal information?

We may share your personal information with other organizations, such as our partners or service providers, for the purposes listed in the **What personal information do we collect and why?** section.

In such cases, we will endeavour to protect the personal information communicated by means of written agreements and undertakings, requiring them in particular to adopt good practices and security measures in line with our expectations.

Third party category

What they do for us

Service Providers (and their own service providers)

We may engage service providers to perform services <u>on our behalf</u>. Categories of service providers accessing or processing your personal information include those engaged to

- Provide analytics services (e.g. Google analytics) consult our Cookie Policy Hyperlink: https://www.iubenda.com/privacypolicy/65655915/cookie-policy.
- Display content from external platforms (e.g. Google Fonts)
- Interact with external social networks and platforms (e.g. Twitter Tweet button and social widgets, by X Corp.)
- Hosting and platform services, such as user registration services (e.g. WordPress.com)
- SPAM protection services (e.g. Google reCAPTCHA)
- Tag management services, to manage tags or scripts on our website (e.g. Google Tag Manager)
- Traffic optimization and distribution (e.g. Cloudflare)

Partners involved in the management of rebate programs

As a retailer, Agromart has a privileged relationship with its customers.

As a result, we participate in the management of certain rebate programs, with certain manufacturers (and their service providers). We may generate data based on your consumption of certain products and share it with third parties that help us perform market analysis, manage the programs, such as our affiliated company Développement Tangara Inc. Tangara helps us creating reports and determining your eligibility and qualification for payment based on your transactions at Agromart.

The reports generated by Tangara may also be shared with the manufacturers, to allow them to manage their rebate program and to perform market analysis. For instance, reports may be shared to allow them to pay rebates to eligible customers.

Affiliated entities

We may share your personal information with our affiliates or shareholders, in an aggregate, de-identified or anonymous form,

to answer a specific request and solely if necessary to manage our corporate affairs.

Others, when authorized by law

From time to time, we may be asked to provide personal information by certain organizations that do not act on our behalf, but are authorized to request it.

We only disclose the information when authorized to do so by law, regulation, court order, subpoena, valid demand or search warrant, or in response to a government investigation or other lawful request.

• How long do we keep your personal information?

We will keep your personal information as long as necessary to fulfill the purposes indicated in this Policy, unless the law or an exceptional situation requires us to keep it longer. This could be the case, for example, in the event of litigation.

• Where do we keep your personal information?

We store your personal information on several servers and platforms in Canada.

If we disclose personal information outside of Canada, where privacy laws may differ, we will ensure that your information receives an adequate protection, for example through contractual measures. While such information is outside of your province or country of residence, it 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.

• How do we protect your personal information?

Only those employees who need to process your personal information to perform their duties have access to it. They have access only to the information they need to perform their duties.

We have implemented several types of measures to protect your personal information against loss, theft and any unauthorized access, use or disclosure. These include

- physical measures, such as locked premises
- technological measures, such as firewalls
- organizational measures

That said, no security measure is absolute or fully guaranteed. If you have reasons to believe that your interaction with us is no longer secure (for example, if you believe that the information you have provided to us has been compromised), please contact us immediately at the address listed in the **How can you get in touch?** section.

• What are your privacy rights?

Accessing, correcting or deleting your information

You may access the personal information we hold about you and obtain a copy of it.

You can request that we correct errors or omissions regarding your personal information. If you demonstrate the inaccuracy, ambiguity or incompleteness of your personal information as found in our files, we will modify them.

Withdraw your consent

You may also withdraw your consent at any time, subject to a reasonable notice.

How this request is handled depends on the situation and the purpose for which it is made. Depending on the situation:

- you may be able to withdraw your consent, but we will no longer be able to offer a product or service or rebate that depends on it. Otherwise, we will inform you of the consequences of your request in our response.
- you will not be able to withdraw your consent because the processing of your personal information is necessary or mandatory

In all cases, we may be required to retain certain personal information to comply with our legal or contractual obligations.

To exercise your rights, please make a written request to our Privacy Officer using the contact details provided in the **How can you get in touch?** section. We may ask you for identification to verify your identity.

To learn more about your rights under Canadian laws, please visit the following link.

• How can you get in touch?

You may direct any requests, questions, complaints or comments regarding this Policy or our privacy practices to our Privacy Officer at

Privacy Officer

Agromart Group 17554 Plover Mills Road Thorndale, ON NOM 2PO Privacyofficer@sollio.ag

Will we update this Policy?

This Policy is effective as of the update date shown at the top of the page.

If we make material changes to this Policy, we will notify you on our site. The changes will take effect at the time of publication of the Policy or any other date indicated in the Policy.