

Privacy Policy (IN SHORT)

This Policy applies to Employee and Candidate Personal Information that is managed by GROUPE GERMAIN INC. and its affiliates (hereinafter "GERMAIN HÔTELS").

Why do we collect your Personal Information?

	Candidate	Employee
• To analyze your application, to facilitate your hiring or, with your consent, to contact you for further offers	✓	
• To communicate with you	✓	✓
• To administer monetary benefits related to your employment		✓
• To comply with our policies	✓	✓
• To protect our interests	✓	✓
• To meet our business objectives	✓	✓

How do we obtain your consent?



If you choose to provide us with your Personal Information after **reviewing this policy**, we will assume that you consent to the collection, use and disclosure of your Personal Information.



If we want to use your Personal Information for a **purpose not identified in this policy** or not required by law, we will ask for your consent before using the information for the new purpose.

With whom do we share your Personal Information?

We may disclose your Personal Information outside of Quebec or of your province of residency, including for:

	Candidate	Employee
• Website hosting	✓	✓
• Human resources software	✓	✓
• Managing Security camera databases and access to building doors	✓	✓
• Managing of insurance and mutual insurance schemes		✓
• Payroll and time management		✓
• IT support		✓
• Financial audits		✓

What rights do you have regarding your Personal Information?

You can, at any time:



Withdraw your consent to the collection, use or disclosure of your Personal Information.



Request **access** to or **correction** of your Personal Information

TO LEARN MORE...

GERMAIN HÔTELS values your privacy and is committed to protecting your Personal Information.

This Policy outlines how we collect, use, disclose and protect your Personal Information and how you may exercise your rights, for example to access or correct it.

When does this Policy apply?

This Policy applies to Employee and Candidate Personal Information that is managed by GERMAIN HÔTELS, whether they are stored by GERMAIN HÔTELS or by a third party.

What does everything mean?

"Applicable Privacy Laws," means any laws, regulations, recommendations or notices applicable to privacy matters, including, to the extent applicable, the *Act respecting the protection of personal information in the private sector* and the *Personal Information Protection and Electronic Documents Act* (PIPEDA), as well as any other statute, regulation, recommendation or notice that replaces, supplements, amends, extends, re-enacts or codifies applicable privacy laws of Canada.

"Employee" means any person employed by GERMAIN HÔTELS, including any intern, student or officer, on a full-time or part-time, permanent or temporary basis.

"Candidate" means any individual who applies for employment at GERMAIN HÔTELS.

"Personal Information" means any information about an individual that directly or indirectly identifies that individual, such as a name, employee number, social insurance number (SIN), online tracking identifier such as an IP address, or one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that individual.

Why do we collect your Personal Information?

We will only collect, use and disclose Candidate and Employee Personal Information in accordance with Applicable Privacy Laws. For example, we will only use your Personal Information for purposes for which we have obtained your consent, or for other purposes that may be required or permitted by law.

Please read on to understand the reasons why we collect your Personal Information.



To facilitate the hiring process



To communicate with you



To administer monetary benefits related to employment

This includes

- checking references provided by a Candidate
- conducting background checks
- screening or pre-employment assessments that are reasonably required to perform the job
- interviews with prospective job Candidates
- with your consent, to contact you with other job offers that may interest you.



To comply with our policies

This includes

- disclosing Personal Information to outside service providers who assist us in administering such information, to appropriate government departments, or as

This includes

- facilitating communication with Candidates and Employees
- for Employees, facilitating communication with family members in the event of medical emergencies or other situations that may arise and require contacting family members
- we will always try, where possible, to collect Candidate and Employee Personal Information directly from the individual, and will only collect Personal Information from other sources as necessary.



To protect our interests

This includes

- using various types of monitoring and control for security purposes, including the presence of Employees, Candidates and others on GERMAIN HÔTELS's premises
- for example, automated card

This includes

- hours worked, rate of pay, or salary, for the purpose of determining base pay
- communicating with third parties, including payroll and benefit service providers, insurers, actuaries, pension trustees, trustees and various government departments as required by law
- internal administration of benefit plans



To meet our business objectives

This includes

- collecting Candidate and Employee demographic data to ensure the success of various Equity, Diversity and Inclusion (EDI) strategies and programs.
- monitoring and promoting employee safety and health, which includes
 - the administration of disability benefits for the

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|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| otherwise required by law | access systems may record information about the entry and exit of Employees to GERMAIN HÔTELS's premises and the time they work | purpose of administering Duty to Accommodate decisions, determining continued employment or ability to return to work safely, or determining workplace hazards |
| <ul style="list-style-type: none">• conducting pre-employment assessments and/or psychometric testing | | |
| <ul style="list-style-type: none">• complying with legal and regulatory requirements. | <ul style="list-style-type: none">• video surveillance cameras that film GERMAIN HÔTELS's premises. | <ul style="list-style-type: none">• the use and possible disclosure of medical information, namely to medical service providers, disability service providers, government parties or financial institutions |
| | | <ul style="list-style-type: none">• conducting medical examination, if required. |

How do we obtain your consent?



- We collect, use and disclose your Personal Information with your consent or as permitted or required by law. **How** we obtain your consent (that is, in what manner) will depend on the **circumstances**, as well as the **sensitivity** of the information collected.
- Your consent may be **express** or **implied**, depending on the circumstances and the sensitivity of the Personal Information in question.
- If you choose to provide Personal Information to us, we assume that you



- Typically, we will seek your consent **at the time** your Personal Information is **collected**.
- If we want to use your Personal Information for a **purpose not previously identified** to you at the time of collection, we will seek your consent prior to our use of such information for this new purpose.
- If you provide Personal Information about **another individual** to us (e.g., emergency contact), **you are responsible** for obtaining their consent



- You may **withdraw your consent** to our collection, use or disclosure of your Personal Information at any time by contacting us using the contact information in the "**How you can contact us?**" section below.
- However, before we implement the withdrawal of consent, we may require **proof of your identity**. In some cases, withdrawal of your consent may mean that we will **no longer be able** to process your application or maintain

consent to the collection, use and disclosure of your Personal Information as outlined in this Policy.

to enable us to collect, use and disclose their information in accordance with this Policy.

the employment relationship.

- We may collect your Personal Information **from third parties** (e.g., information obtained from references, criminal history), with your consent.

What Personal Information do we collect?

We may collect the following information:

- Name
- Postal and email address
- Telephone number
- Date of Birth
- Gender
- Social Insurance Number (SIN)
- Resume and references
- Qualifications and skills
- Performance Evaluation
- Work record
- Legal documents related to employment
- Medical documents
- Educational documentation (licenses and certifications)
- Driver's license (if required to drive for employment purposes or as identification for a background check)
- Background check results
- Banking information (for payroll deposits)
- Marital status
- Name and date of birth of spouse and/or dependents (if applicable)
- Employee's photograph
- Geolocation
- Browsing history, search history, or information about your interaction with a website or application using computer equipment provided by the employer.

With whom do we share Personal Information?

We may disclose your Personal Information to third parties or service providers for the reasons explained above or as otherwise set out in this Policy.

We will not sell or rent Personal Information to third parties or trade Personal Information with third parties. However, we may share Personal Information where permitted or required by law, or as set out below:

Service providers



We may use service providers to perform services on our behalf. For example, we may hire an individual or organization to perform work on our behalf. We only provide these service providers with the Personal Information necessary to perform the services.

We inform them that they are prohibited from using Personal Information for any purpose other than to perform the services for which they have been retained. These service providers are not permitted to share this Personal Information with others. We will endeavour to protect Personal Information disclosed to third parties by entering into contractual agreements and, to the extent applicable, written undertakings with them, requiring them to adopt reasonable privacy and security procedures and measures.

Categories of service providers handling your personal information include the following:

- payroll and time management;
- management of insurance and mutual insurance schemes;
- management of databases for security cameras and building door access;
- computer assistance;
- financial audits;
- human resources software;
- management of the website.

If you would like more information about our service providers, please contact us by following the instructions provided in the **"How you can contact us?"** section.

As permitted or required by law



We may disclose Personal Information when required 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.

We may also disclose such Information to its accountants, auditors, agents and attorneys to enforce or protect our legal rights. In addition, we may disclose certain Personal Information when we reasonably believe that it is necessary to do so to protect the rights, safety or property of GERMAIN HÔTELS or others, as provided or permitted by law.

To perform an agreement and other legal grounds



To the extent applicable and necessary, we may disclose Personal Information to enter into an agreement, or for any other recognized purpose that we may have for disclosing information.

Business Transactions



We may disclose Personal Information to a third party in connection with a reorganization, merger, sale, joint venture, assignment or other disposition of all or part of our business, brands, affiliates, subsidiaries or other assets.

However, if such a transaction is completed, Personal Information will continue to be protected under Applicable Privacy Laws. If such a transaction is not completed, we will require the other party to refrain from using or disclosing your Personal Information in any manner and to destroy it completely.

What do we expect from you as an Employee?

We will make reasonable efforts to ensure that the Personal Information we collect, use or disclose about our Employees is accurate and as complete as possible.

To the extent that you provide us with information on which we intend to rely, we assume that such information is accurate and up-to-date. If any of your Employee Personal Information changes during the course of your employment with us, we also expect you to notify us of such changes so that your employment record can be updated.

How long do we keep your Personal Information?

We will keep your Personal Information in accordance with our other business and legal obligations and only as long as reasonably necessary to fulfill those obligations, unless a longer retention period is required by law.

If we use Personal Information to make a decision that directly affects a Candidate or an Employee, we will retain the information for a reasonable period of time after using it and for at least one year after we make the decision. In other cases, we will destroy records containing Personal Information or in some cases, anonymize all Personal Information in the records, when we no longer need the information for the purpose for which it was collected, or for other business or legal purposes.

Where do we keep your Personal Information?

We currently keep Candidate or Employee Personal Information in Canada. If necessary, it may be stored and processed in any country where we use third party service providers. In the latter

case, we may transfer Personal Information to countries other than your country/province/state of residence, where privacy rules may be different.

If your Personal Information is processed outside of your country/province of residence, it is subject to the laws of the country/province/state in which it is located and may be disclosed to the governments, courts, law enforcement agencies or regulatory bodies of that other country, or disclosed in accordance with the laws of such country. However, our practices regarding your Personal Information will at all times be governed by this Policy and Applicable Privacy Laws.

What rights do you have regarding your Personal Information?

We will take steps to ensure that your Personal Information is kept as accurate, complete and up-to-date as reasonably necessary. We will not routinely update your Personal Information, unless such a process is necessary. We expect you, from time to time, to supply us with updates to your Personal Information, when required.

We may require that you provide sufficient identification to fulfill your request to access or correct your Personal Information. Any such identifying information will be used only for this purpose.



Right of access and rectification

You may request access to and a copy of the Personal Information we have about you.

If any Personal Information about you is inaccurate, incomplete or misleading, or if its collection, disclosure or retention is not permitted by law, you may request that it be rectified.

You may also request information from us about the ways in which your Personal Information was collected from you, as well as the names of the individuals and



Right to consent withdrawal

You may withdraw your consent to the disclosure or use of the Personal Information collected.

organizations who have access to your information within GERMAIN HÔTELS and details about how long we store it.

To exercise your rights, please send a written request, with proof of your identity, to our Privacy Officer at the following contact information:

Privacy Officer

1200, rue Des-Sœurs-Du-Bon-Pasteur, local 500 – Québec (Québec), Canada G1S 0B1

privacy@germainhotels.com

Once your request has been sent, we will provide you with a written response no later than 30 days from the date of receipt of your request at the contact information indicated above.

In some specific cases, we may refuse to provide you with the Personal Information requested or we may redact (black out) certain information from the records that we provide you with.

How do we protect your Personal Information?

We will implement procedures and security measures for access to physical and electronic records containing Candidate and Employee Personal Information that is under our control.

For example, only authorized personnel, who are bound by confidentiality obligations, have access to both the physical and electronic files containing Employee and Candidate Personal Information. Employee and Candidate Personal Information stored electronically will be adequately protected by security measures and passwords and will be accessible only to those personnel who require access to perform their duties, including employees in the Human Resources department and certain authorized managers.

Who will assess compliance with this Policy?

GERMAIN HÔTELS's Privacy Officer will independently assess allegations of violations of the Privacy Policy by reviewing practices and procedures and determine whether follow-up corrective action is required, including disciplinary action up to and including termination of employment.

How can you contact us?

Please direct any requests, questions or comments regarding this Policy to the Privacy Officer at the contact information provided below.

Privacy Officer

1200, rue Des-Sœurs-Du-Bon-Pasteur, local 500 – Québec (Québec), Canada G1S 0B1

privacy@germainhotels.com

Will we update this Policy?

This Policy is current as of the "updated" date which appears at the bottom of each page.

We may modify this Policy from time to time. When we make changes to this Policy, they become immediately effective when made available to you on our website.