



PRIVATE POLICY

This Privacy Policy (the “Policy”) sets out the practices of Estérel Resort with respect to the collection, use, disclosure, and retention of your personal information. For ease of reference, we frequently use “we” in this Policy when referring to Estérel Resort.

This Policy applies regardless of the manner in which we collect your personal information, including, for example, in person, by telephone, by email, or through our websites.

In certain circumstances, we may provide you with additional information regarding the processing of your personal information at the time of collection, including by means of a separate consent form, where applicable.

By accepting this Policy or by providing us with personal information after having had the opportunity to review it or any supplemental notice, you agree that your personal information will be processed in accordance with this Policy and any applicable supplemental forms.

1. How to contact our privacy officer

You may contact our Privacy Officer as follows:

By email:	loi25@esterel.com Attention: Privacy Officer.
By mail:	39 ch. Fridolin-Simard, Estérel, Québec, J0T 1E0 Attention: Privacy Officer.

2. How do we process your personal information?

We process your personal information based on the nature of your interactions with us.

—Employee files —

How do we collect your personal information?	ATS, Office 365, email, telephone, EMPREZ, FolksHR, EmployeurD, physical file.
What personal information do we collect?	First name, last name, telephone number, mailing address, date of birth, emergency contact information, Social Insurance Number (SIN), and bank account number.
From whom do we collect your personal information?	We collect your personal information directly from the employee.
Why do we collect and use your personal information?	We collect and use your personal information to open and maintain the employee's file and for purposes.
How can you refuse the collection of your personal information, and what are the consequences of such refusal?	Not applicable.
Who will have access to your personal information?	Your personal information will be accessible to the Human Resources Department, the Payroll Department, and managers.
How will we share your personal information?	Personal information is stored in files on a secure network within Human Resources and in payroll and scheduling software accessible to the Payroll team and to managers responsible for the employee.
How long do we retain your personal information?	We retain personal information for a period of seven (7) years.
What are the inherent risks associated with the processing of your personal information?	A risk that servers could be compromised.
Where do we store your personal information?	Personal information is stored on a secure network and within the payroll system.
Will we make a decision based exclusively on the automated processing of your personal information?	No.



We will process your personal information in accordance with the nature of your interactions with us. – **CUSTOMER AND CO-OWNER RESERVATIONS** –

How do we collect your personal information?	Booking platforms, Microsoft 365, telephone, email, registration card.
What personal information do we collect?	First name, last name, telephone number, mailing address, date of birth, emergency contact information, Social Insurance Number (SIN), and bank account number.
From whom do we collect your personal information?	The client (or co-owner), or a duly authorized third party acting on behalf of the client (or co-owner).
Why do we collect and use your personal information?	Reservation confirmation, payment processing, client (or co-owner) file, lost and found, activity reservations.
How can you refuse the collection of your personal information, and what are the consequences of such refusal?	Not applicable.
Who will have access to your personal information?	Personal information is stored on the booking platform and in the property management system (PMS).
How will we share your personal information?	Personal information is stored in files on a secure network within Human Resources and in payroll and scheduling software accessible to the Payroll team and to managers responsible for the employee.
How long do we retain your personal information?	Personal information is retained for as long as necessary to carry out the organization's operations, unless otherwise required by law or in exceptional circumstances.
What are the inherent risks associated with the processing of your personal information?	A risk that servers could be compromised.
Where do we store your personal information?	Secure network and web platform.
Will we make a decision based exclusively on the automated processing of your personal information?	No.



We will process your personal information in accordance with the nature of your interactions with us. – **SUPPLIERS** –

How do we collect your personal information?	Microsoft 365, telephone, email, billing.
What personal information do we collect?	First name, last name, email address, telephone number, credit card information, mailing address.
From whom do we collect your personal information?	The suppliers or their respective businesses.
Why do we collect and use your personal information?	Billing, quotation, statement of account, partnership arrangements.
How can you refuse the collection of your personal information, and what are the consequences of such refusal?	Not applicable.
Who will have access to your personal information?	Authorized personnel within the Operations Department, the Accounting Department, and Management.
How will we share your personal information?	Personal information is retained for as long as necessary to carry out the organization's operations, unless otherwise required by law or in exceptional circumstances.
How long do we retain your personal information?	Personal information is retained for as long as necessary to carry out the organization's operations, unless otherwise required by law or in exceptional circumstances.
What are the inherent risks associated with the processing of your personal information?	A risk that servers could be compromised.
Where do we store your personal information?	Secure network and locked physical file storage.
Will we make a decision based exclusively on the automated processing of your personal information?	No.

We will process your personal information in accordance with the nature of your interactions with us. – **SUITE OWNER** –

How do we collect your personal information?	Microsoft 365, email, telephone, lease agreement, deed of sale.
What personal information do we collect?	First name and last name (or corporate name, where applicable), email address, mailing address, bank account number, tax identification number, names of immediate family members.
From whom do we collect your personal information?	Notary and the co-owner and/or the co-owner's authorized representative.
Why do we collect and use your personal information?	Opening of the co-owner's file, rent payment processing.
How can you refuse the collection of your personal information, and what are the consequences of such refusal?	Not applicable.
Who will have access to your personal information?	Personal information is stored in files on a secure network within the Accounting Department.
How will we share your personal information?	Personal information is retained for as long as necessary to carry out the organization's operations, unless otherwise required by law or in exceptional circumstances.
How long do we retain your personal information?	For as long as the owner remains active and, thereafter, for seven (7) years following the sale of the unit.
What are the inherent risks associated with the processing of your personal information?	A risk that servers could be compromised.
Where do we store your personal information?	Secure network, physical file marked as closed.
Will we make a decision based exclusively on the automated processing of your personal information?	No.

3. What identification, profiling, or tracking technologies do we use?

We use technologies that enable us to identify you, determine your location, or carry out profiling in relation to you. These technologies allow you to access and benefit from the following services:

- Tools that infer personal preferences based on online behaviour.
- Technologies related to targeted advertising or the assessment and performance measurement of advertising campaigns.

These technologies enable the following functionality: personalization of your use of the website. You may activate these technologies by consenting to the cookies identified as serving identification, profiling, or location purposes in the cookie banner displayed on our website. For further information, please refer to our Cookie Policy attached as Schedule A hereto.

4. Premises security

Our properties are equipped with video surveillance cameras capable of recording your image or your vehicle, including your licence plate number, make and model, when you are on our premises. In limited circumstances, these cameras may also capture images of individuals located in the vicinity of our properties.

Certain areas of our sites are subject to access restrictions. To enter these areas, you may be required to provide your name and other information. If you are a contractor with whom we do business, we may issue you an access card, whether physical or digital, to access our buildings. We will collect information about you as well as about the company authorizing us to issue you such card. Our card readers record the dates and times of use.

We also employ security personnel to monitor and protect our buildings. In the event of an incident, these personnel may collect information about the individuals involved, interview witnesses, and record other relevant details. The data collected as part of our security programs is used to protect our property, maintain a safe environment for our employees, customers, and visitors, respond to emergencies, investigate breaches of our policies or violations of the law, and examine claims such as property damage or personal injury.

5. Safeguards and inherent risks

We implement appropriate security safeguards to protect your personal information. However, given the risks inherent in the use of information systems, we cannot ensure or guarantee the security and confidentiality of the personal information that you transmit or provide to us.

If you have reason to believe that personal information has been compromised, please contact our Privacy Officer.

6. What are your rights with respect to your personal information?

The law grants you various rights regarding your personal information. You have the following rights:

- **Access to your personal information**

You may ask us whether we hold personal information about you and, if so, request access to that personal information.

- **Correction**

You may request that we correct any personal information we hold about you that is incomplete or inaccurate.

- **Withdrawal of consent**

You may withdraw your consent to the disclosure or use of the personal information we hold about you.

7. How can you exercise your rights?

To exercise any of the rights described above, please contact our Privacy Officer using the contact information provided in section 1.

8. How can you file a complaint regarding our handling of your personal information?

Estérel Resort takes requests, complaints, and comments regarding how we handle your personal information very seriously. We invite you to contact our Privacy Officer to submit complaints or comments regarding our personal information protection practices.

Your complaint will be reviewed by our Privacy Officer, who will determine whether the handling of your personal information complies with our privacy program and with applicable laws.

We aim to respond to each complaint promptly and within 30 days.

You may also file a complaint with the Commission d'accès à l'information du Québec (Quebec Access to Information Commission) using the form available [here](#). However, we encourage you to first contact our Privacy Officer.

9. External sites or services

This Policy does not apply to third-party websites, pages, or applications that may be accessed through our products and services, including, without limitation, our websites, web portals, and mobile applications, and we are not responsible for such third-party services. If you follow such links, those third-party sites or services will likely have their own privacy policies, which you should review before submitting your personal information.



10. How do we update this Policy?

We may, at our sole discretion, amend this Policy from time to time.

Before taking effect, any proposed changes will be published on Estérel Resort's websites, together with a notice of change. The proposed changes will take effect on the date indicated in the relevant notice of change.



SCHEDULE A

POLICY ON THE USE OF COOKIES AND IDENTIFICATION, PROFILING AND LOCATION TECHNOLOGIES

This policy regarding the use of analytics tools and cookies (the "Cookie Policy") describes how and why Estérel Inc., as well as all affiliated entities, companies, brands, or trade names as set out in Schedule B hereto ("Estérel Resort" or "we"), uses cookies, web beacons, and other identification, profiling, and location technologies on our websites, our mobile applications, and in our promotional electronic communications.

Our Cookie Policy supplements our Privacy Policy and should therefore be read in conjunction with it.

1. What you need to know about cookies and web beacons

a. What are cookies and web beacons?

Cookies are small text files that are downloaded to your device when you visit a website, use a mobile application, or download an email. Cookies allow a website to recognize a device, store information (for example about your preferences or your use of the website), and retrieve that information each time you access the website.

First-party cookies. First-party cookies are created by the website you visit. A website can only access the cookies that it has placed on your device. For example, cookies placed when you visit a search engine are not accessible by our websites.

Third-party cookies. Third-party cookies are created by a website other than the one you are visiting and are mainly used for profiling and behavioural advertising purposes. They also allow website owners to provide certain services. This type of cookie may be placed through what is



known as a web beacon (more information on this below). Since a website can only access the cookies it has placed, we cannot access third-party cookies placed on any of our websites.

A web beacon, often referred to as an invisible pixel, is a transparent image, usually 1 pixel by 1 pixel, that is placed on a website or in an email to measure how a user interacts with specific content. Web beacons operate by sending information with the request to the third party's web server when the web beacon is requested to be displayed.

b. What can you do to control the cookies placed on your computer or mobile device?

Most browsers allow you to configure how cookies are accepted by your browser. Keep in mind that changing your cookie settings may prevent certain websites from functioning properly. Please consult your browser developer's documentation to learn how to configure cookie settings.

You may also use your browser's private or incognito mode, which will automatically delete all cookies placed during your use of private mode once all private browsing tabs are closed. Please consult your browser's help section to learn more about how private mode works.

Most recent browsers include built-in features to block or control content used for profiling. We encourage you to consult your browser's help section to determine whether such a feature is available.

Some browsers may offer third-party extensions that can be used to manage and delete cookies. If you choose to use such extensions, we encourage you to pay close attention to the extensions you install and the permissions they require.

You may also disable our use of cookies and similar technologies that allow us to conduct profiling and display advertising on third-party websites.

2. How do we use cookies on our website?

a. Why do we use cookies on our websites and mobile applications?

We use cookies and web beacons to:

- analyze traffic on our websites and mobile applications generally;
- adjust website or mobile application settings based on your device;
- display advertisements through services provided by third parties;
- help us understand how people use our services and interact with our promotional materials so that we can improve them;
- help us personalize our approach, responses, and services by remembering your preferences;
- build profiles to refine our marketing strategies.



In addition, we use third-party cookies and web beacons from providers such as Mailchimp, TikTok, Google Analytics, DoubleClick, and Facebook for analytics, preference, and improvement purposes.

These cookies and web beacons allow us to display promotional content on websites that are not owned by Estérel Resort.

Web beacons are also included in our promotional emails to collect statistical information regarding email openings and interactions with their content, for the purpose of assessing and analyzing the performance of our promotional campaigns. Your interaction with these promotional emails may be used as an indicator of your interest in our products and services. Based on this interaction, we may adjust the manner and frequency with which we contact you regarding our promotional offers and communications.

Security. We use cookies to ensure the proper functioning of our security measures, as well as those implemented by third parties.

Traffic Analysis. We use cookies to understand how you interact with our websites and mobile applications. Our partners may also use cookies to analyze your use of our websites and applications and to provide us with information regarding such use.

Marketing. We use cookies to display advertisements based on your interests and your use of our websites and mobile applications. Our partners may also use cookies to determine whether our advertisements have been displayed to you and, if so, whether you have interacted with them. In such cases, our partners share data and statistics with us regarding the performance of our advertisements.

3. Analytics tools used to measure interaction with our websites, mobile applications and promotional materials

a. What you should know about analytics

Analytics tools are used to collect, analyze and measure web traffic and user visits to our websites and mobile applications to better understand and optimize their use. These tools operate by collecting information about a visitor's interactions with one or more web pages. Such information may include, for example, the visitor's IP address.

b. Which analytics tools do we use on our websites?

Google Analytics.

We use the Google Analytics tool provided by Google Inc. to collect information about how visitors use our websites. We use the reports generated by Google Analytics to help us improve our websites.

The information collected is in an anonymized form and may include:

- the country and city from which you access our websites;
- demographic information based on information that Google already holds about you from your interactions with other websites;
- the number of visitors to our websites and the pages visited.

Additional information about the data made available to us through Google Analytics is available on the following page.

When we transmit your IP address to Google for the purposes of using Google Analytics, we anonymize it by truncating the last three digits. The Google Analytics Terms of Use prohibit us from sending personal information to Google through Google Analytics. Information relating to your interaction with our websites will be transferred to and stored by Google.

In addition, we also use the following services provided through Google Analytics:

- Google Analytics Demographics and Interest Reporting;
- Google Display Network Impression Reporting;
- Remarketing with Google Analytics.

To learn more about how Google processes personal information it may hold about you through the Google Analytics services we use, please consult Google’s Privacy Policy by clicking [here](#).

4. How do we update this Policy?

We may, at our sole discretion, amend this Cookie Policy from time to time. Before taking effect, any proposed amendments will be published on Estérel Resort’s websites together with a notice of change. Such amendments will come into force on the date specified in the relevant notice of change.

For further information:

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By mail:	39 ch. Fridolin-Simard, Estérel, Québec, J0T 1E0 Attention: Privacy Officer.

