



SUMMARY OF OUR INTERNAL GOVERNANCE POLICY REGARDING THE PROTECTION OF PERSONAL INFORMATION

Estérel Resort is committed to protecting your personal information throughout its entire life cycle, in accordance with its personal information protection program and the requirements set out in applicable laws.

To this end, in addition to our privacy policy, Estérel Resort has adopted a governance policy regarding personal information, the purpose of which is to outline the principles governing the protection of personal information in the course of its operations.

The objectives of our governance policy are to:

- i. ensure the appropriate, secure, compliant, and transparent handling of your personal information;
- ii. establish guidelines governing the handling of personal information by Estérel Resort throughout its life cycle; and
- iii. define the roles and responsibilities of the person responsible for the protection of personal information and those of our staff.

1 Roles and responsibilities

Because respect for your personal information is everyone's responsibility at Estérel Resort, our person responsible for the protection of personal information is supported by a multidisciplinary team that includes members from each of our business units, as well as external advisors.

Each member of our staff has a role to play in ensuring that we act in accordance with our personal information protection program. Accordingly, each staff member is expected to:

- i. direct to the person responsible for the protection of personal information any questions or comments regarding how we handle or should handle your personal information;
- ii. participate in training and awareness activities regarding the importance we place on the protection of personal information.

2 Governance principles

Estérel Resort recognizes the importance of protecting the confidentiality and security of the personal information it processes in the course of its activities, as well as the importance of raising awareness among its staff and partners on this matter.



Estérel Resort has developed guidelines outlining best practices and prohibited practices regarding how your personal information may be handled, including, for example:

- i. we determine the purposes and objectives pursued before collecting your personal information. Your personal information is then used only in accordance with those purposes and objectives;
- ii. if we identify new purposes, we will seek to obtain express consent in order to process your personal information in accordance with those new purposes, unless the law allows us to do otherwise;
- iii. we seek to collect only the minimum amount of personal information required to achieve the identified purposes;
- iv. we strive to obtain your consent at the time your personal information is collected, and when sensitive personal information is involved, we seek to obtain your express consent;
- v. we display our privacy policy in a clear and visible manner when collecting your personal information through technological means;
- vi. we ensure that our technological products or services with privacy settings offer, by default, the highest level of privacy without requiring any action on your part;
- vii. we do not use technologies that allow for identification, location tracking, or profiling without disclosing such practices and informing you how to activate such features;
- viii. we ensure that your personal information is complete and up to date when we use it;
- ix. we carry out privacy impact assessments when required by law, and when we consider that the processing of your personal information presents risks to your privacy;
- x. to the extent possible, we limit access to your personal information solely to members of our staff and service providers who require access in the course of our operations;
- xi. when we make fully automated decisions using your personal information, we ensure that you are informed of the use of such technology and that a process is in place allowing you to submit your observations;
- xii. we do not disclose your personal information to third parties without your consent, except where permitted by law.



3 CONFIDENTIALITY INCIDENT

Estérel Resort has implemented a process to respond to and manage confidentiality incidents.

Under this process, Estérel Resort must take reasonable measures to reduce the risk of serious harm and review its practices in order to prevent new confidentiality incidents of a similar nature.

Estérel Resort documents all confidentiality incidents in its confidentiality incident register and will adapt its personal information protection program as necessary following a confidentiality incident.