

## **Privacy Policy**

Kruger Inc. and its affiliates (“Kruger” or “we”) are committed to maintaining the accuracy, security and privacy of Personal Information in accordance with applicable legislation. This Kruger Privacy Policy is a statement of principles and guidelines concerning the protection of Personal Information of our clients, service providers and other individuals (“you”).

### **Consent**

BY SUBMITTING PERSONAL INFORMATION TO KRUGER OR ITS SERVICE PROVIDERS AND AGENTS, YOU AGREE: THAT WE MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting the Kruger Inc.’s Corporate Director, Compliance. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you. If you provide Kruger or our service providers and agents with personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

### **What Personal Information do We Collect?**

Canadian privacy legislation defines "Personal Information" broadly as information about an identifiable individual or as information that allows an individual to be identified. For the purposes of this policy, Personal Information means information about an identifiable individual as defined from time to time in applicable privacy legislation. Generally speaking Personal Information does not include what is considered business contact information: your name, title or position, business address, telephone number, facsimile number or e-mail address. The types of Personal Information that Kruger may collect about you includes your name, home address, telephone number, personal e-mail address, billing and account information, and other information incidental to manufacturing and selling our products and providing our services.

We also collect from former employers and other third parties, and from publicly available sources, personal information about prospective or current employees, contractors and partners that is reasonably required to establish, manage or terminate an employment, contractual or partnership relationship.

### **Why do We Collect Your Personal Information?**

In general, Kruger collects, uses and discloses Personal Information about our customers and service providers in order to provide our customers with services related to their purchase of products, and about applicants for positions with Kruger for the purpose of evaluating the application and deciding whether to establish (and subsequently to manage



terminate an employment, contractual or partnership relationship. More specifically, we collect, use and disclose your Personal Information for the following purposes;

- to establish and manage customer relationships, perform services and fulfill our duties. This may include the sharing of Personal Information by and between Kruger personnel and affiliated companies and partnerships for such purposes;
- to consider whether Kruger should establish a commercial relationship with customers, suppliers and other third parties, including to evaluate credit standing and to match credit bureau or credit reporting agency information;
- to establish and maintain commercial relationships with customers, suppliers and other third parties, including to issue invoices, administer accounts, collect and process payments, and to fulfill contractual obligations;
- to establish, manage and terminate employment, contractual and partnership relationships; .
- to understand and respond to customer, supplier and other third party needs and preferences, including to contact and communicate with such parties and to conduct surveys, research and evaluations;
- to develop, enhance, market, sell or otherwise provide Kruger's products and services;
- to market, sell or otherwise provide products and services of third parties with whom Kruger has a commercial relationship;
- to distribute our newsletters and other informational e-mail communications, and other material to individuals on our mail and e-mail lists, including via third party mailing houses and e-mail service providers;
- to develop and manage Kruger's business and operations;
- to detect and protect Kruger and other third parties against error, negligence, breach of contract, fraud, theft and other illegal activity, and to audit compliance with Kruger's policies and contractual obligations;
- to engage in business transactions, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving Kruger;
- as permitted by, and to comply with, any legal or regulatory requirements or provisions; and
- for any other purpose to which you consent.

### **To Whom do We Disclose Your Personal Information?**

From time to time, Kruger may disclose your Personal Information to:

- service providers, including an organization or individual retained by Kruger to perform functions on its behalf, such as marketing, data processing, document management and office services;
- an organization or individual retained by Kruger to evaluate your creditworthiness or to collect debts outstanding on an account;
- a financial institution, on a confidential basis and solely in connection with the assignment of a right to receive payment, the provision of security or other financing arrangements; or
- a person who, in the reasonable judgment of Kruger, is providing or seeking the information as your agent;
- to our insurers and to regulatory agencies such as insurers or others in connection with regulatory or other activities relating to the obligations of Kruger;
- to personnel in Kruger, government authorities, insurers, benefits providers, consultants or agents as reasonably required to establish, manage or terminate employment, contractual and partnership relationships; and



# Kruger

any third party or parties, where you consent to such disclosure or where disclosure is required or permitted by law,

## **Where do We Store Your Personal Information?**

Your Personal Information is stored in secured locations and on servers controlled by Kruger, located either at our offices or at the offices of our service providers,

## **How May You Obtain Access to Your Personal Information?**

Upon your written request, subject to certain exceptions, Kruger will inform you of the existence, use and disclosure of your Personal Information and will give you access to that information. Access requests should be sent to our Corporate Director, Compliance, using the contact information below.

## **How do We Protect Your Personal Information?**

To help protect the confidentiality of your Personal Information, Kruger employs administrative and technological safeguards appropriate to the sensitivity of your Personal Information. Where Personal Information is sent to a third party for processing we ensure, through our contacts with them, that all Personal Information is kept secure. We operate secure data networks protected by industry standard firewall and password protection systems.

## **Privacy and Our Website**

**Cookies-**When an individual visitor accesses the Kruger website, we may use a browser feature called a 'cookie' to collect information such as the type of Internet browser and operating system the visitor uses, the domain name of the Website from which the visitor came, date and duration of the visit, number of visits, average time spent on our website, pages viewed and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies the visitor's browser, but not necessarily the visitor; to our computers each time our website is visited. Unless a visitor specifically informs us (e.g. by registering for an event or sending us correspondence from the website), we will not know who the individual visitors are. In addition to the identified purposes described in our Privacy Policy, we may use this website information and share it with other organizations with whom we have a commercial relationship to measure the use of our website, to improve the functionality and content of the website and to facilitate usage by a visitor. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on our website.

**Online Communications** - In order to provide our website visitors with a service or information, visitors may voluntarily submit Personal Information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, and participating in contests and surveys. If you are known to Kruger as a registered user of an online service, we may combine and store Personal Information about your use of our website and the on line information you have provided with certain other online and offline information we may have collected.

**E-mail Communications** - Occasionally, we may send marketing or promotional e-mail communications to you with information that may be useful, including information about the products and services of Kruger and other third parties with whom we have a relationship. In this process, we may collect certain information such as the date/time you first opened our e-mail communications, the number of times you open our e-mail communications, the number of click-throughs per article, total click-through activity on the contents of our e-mail



**Kruger** communications and compile generally the related statistics. We may combine and store any such information to manage and improve our e-mail communications to you. We will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future marketing or promotional e-mails from Kruger.

**Links** – Our website may contain links to other websites which are provided as a convenience only. Visitors are advised that other third party websites may have different privacy policies and practices than Kruger, and Kruger has no responsibility for such third party websites.

### **Changes to the Privacy Policy**

Kruger reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes on our website and make such revised policy and changes available upon request to the Kruger Corporate Director of Compliance. However, Kruger will obtain the necessary consents required under applicable privacy laws if it seeks to collect, use or disclose your Personal Information for purposes other than those to which consent has been obtained unless otherwise required or permitted by law.

### **Further Information**

For information about this Privacy Policy, please contact:

3285 Bedford Road  
Montreal, Quebec H3S 1G5  
Attention: Corporate Director, Compliance