



Website Privacy Policy

Alouette is committed to protecting the privacy of Personal Information, and takes the protection of personal information very seriously. In order to bring to Users' attention the privacy practices implemented, Alouette has prepared this Privacy Policy, which summarizes: **(i)** the types of Personal Information collected and the reasons why Alouette collects it; **(ii)** how Alouette uses and protects Personal Information; **(iii)** under what circumstances Personal Information can be shared; and **(iv)** how Alouette stores and destroys Personal Information. This Privacy Policy further describes Your rights, as well as the security measures in place and the procedure applicable in the event of a breach of confidentiality.

This Privacy Policy should be reviewed carefully, as it governs the use of the Website.

You do not have to provide Personal Information to access and use the Website unless You decide to contact Alouette and to disclose information to Alouette; Personal Information may, however, be processed as set out below.

Alouette is committed to comply with and implement the provisions of the Act respecting the protection of personal information in the private sector (the Act). In this regard, Alouette has appointed a person in charge of the protection of personal information.

1. Definitions and interpretation

In this Privacy Policy, the following capitalized terms have the meanings set forth below:

- **Alouette** refers to Aluminerie Alouette inc.
- **Authorized Subcontractor** refers to any person assisting Alouette in the development or provision of the Website, and requiring access to certain information (including Personal Information).
- **Cookies** refers to the small text files that are placed on the hard disk of devices as applicable when someone accesses the Website, which may either be temporary and disappear when such devices are turned off or be permanent and stay even after such devices are turned off.
- **Other Forms of Technologies** means any other forms of software/system that can retain information for an extended period of time.
- **Personal Information** means any information concerning a natural person which directly or indirectly allows the person to be identified, except as set forth in the Act.

- **User** or **You** means any person browsing on the Website.
- **Website** refers to Alouette's website available at <https://www.alouette.com/> or any other URL, as may be applicable from time to time.

Unless the context requires otherwise: (i) grammatical variations of any term defined herein have a similar meaning; and (ii) words importing the singular number shall include the plural and words importing the masculine gender shall include the feminine and neutral genders and vice versa.

2. Collection and use of personal information

Personal Information collected or provided in connection with the Website is obtained, used, disclosed, retained, destroyed and otherwise processed as provided for in this Privacy Policy. Alouette may also process Personal Information in accordance with applicable laws and regulations, including the Act, to comply with its obligations.

2.1 Information obtained directly from a User

No Personal Information needs to be collected or provided to access and use the Website. You may, however, choose to provide some Personal Information to Alouette. If You provide information to Alouette, then Alouette will, in accordance with the Act, consider that You have consented to the collection of such information for the purposes for which it was provided (or otherwise as required or permitted by the Act).

The following information may be provided:

- **Comments, questions and requests for information:** Alouette collects information when You fill out an information request form or when You contact Alouette by e-mail. You may choose to provide certain Personal Information (e.g., names and e-mail addresses, and opinions/observations) if You contact Alouette to request information or to make any requests/comments. Alouette will use the Personal Information provided to respond to Your communication.
- **Content:** No Personal Information needs to be provided to have access to the content of the Website. Cookies may, however, collect certain information as described in Section 2.2 below.
- **Online accounts:** Alouette's employees may have access to an online account to allow them to view their employee files, to work and track vacations remotely, and to access training, e-mails and other resources offered by Alouette. These online accounts are governed by the policies of Alouette applicable to them.

2.2 Information Collected Using Cookies and Other Forms of Technologies

Alouette uses Cookies on its Website to improve Your experience and to collect information about Your use of our Website. Certain types of Personal Information can be collected by automated means, such as through the following Cookies or Other Forms of Technologies:

- **Cookies and Other Forms of Technologies.** When You access or use the Website, certain information (e.g., clicks/interactions that have occurred) may be collected using the following Cookies:

Process Cookies	These Cookies allow the Website to work properly in keeping track of requests, ensuring the integrity of web pages and allowing Users to browse from one page to the other.
Personalization Cookies	These Cookies are used to personalize and enhance Your experience by presenting personalized features or content.
Statistical Cookies	These Cookies collect data (such as the date, time, frequency of use, pages viewed, features used and questions submitted in the search bar) to allow Alouette to see how You interact with the Website. The statistics generated are used to improve the Website and to design features that improve Your experience (e.g., more information about a topic).

We also use Google Analytics to better understand who is using our Website, and how it is being used. Google Analytics uses Cookies to collect information, such as the pages visited, places where Users click, the time spent on each Website page, the Internet Protocol address, the type of operating system used, and location. For information about how Google Analytics uses this information, please visit: <http://www.google.com/policies/privacy/partners/>. Google may track Your activity over time and across websites. Once again, such information is used to target advertisements and content that may be of interest to You, and also to provide statistical insight through features such as Google Analytics and Google Ads.

Many web browsers allow You to manage Your preferences. You can set Your browser to refuse Cookies or delete certain Cookies. You may be able to manage Other Forms of Technologies in the same way that You manage Cookies using Your browser's preference. In some instances, Cookies (e.g., those that are not required) and tracking tools used by third-party service providers may be disabled (e.g., Google allows You to deactivate Cookies designed to target ads by accessing its [Opt-Out page](#), and Google Analytics can be deactivated, once You download the browser add-on available for that purpose). You may also decline the use of Cookies by other third-party vendors by logging on to the Network Advertising Initiative consumer deactivation page.

Other Forms of Technologies can also be used for similar purposes. Anyone experiencing issues can contact Alouette.

- **Social Media:** Alouette uses social media platforms that allow You to follow and add Alouette to Your list of contacts. Alouette has access to web pages and profiles according to the settings chosen, as described in the privacy policies and terms of use applicable to these platforms. Alouette also receives notifications and access to links and/or other publications in which it is identified/tagged. You should review the privacy settings applicable to such accounts/pages to determine the content that Your contact can access and limit that access, if necessary.

3. Sharing of Personal Information Collected

Alouette does not sell or otherwise market Personal Information. In addition, no Personal Information is shared or disclosed to third parties or used for purposes other than those: (i) described in this Privacy Policy; (ii) required or permitted by law; or (iii) authorized by the Users.

- **Website:** Personal Information may be shared with the Authorized Subcontractors assisting Alouette with the Website. In such case, disclosure will be limited to the Authorized Subcontractors with a “need to know” such information and bound by confidentiality agreement, and will take place in compliance with applicable law;
- **Other:** Alouette reserves the right to disclose Personal Information about Users: (i) in order to comply with a law/regulation, including any legal proceedings or governmental requests; (ii) to defend itself in the event of a legal action; (iii) to protect its right and the rights of the Users and (iv) as otherwise permitted or required by law, including the Act.

4. Security measures implemented

4.1 Security

Alouette has implemented various measures to preserve the security and privacy of Personal Information, which are reasonable considering, in particular, its sensitivity, the purpose of its use, its quantity, its distribution, and its medium. These measures include the following:

- **Limited collection and processing:** No Personal Information needs to be provided; should Personal Information be provided, then Alouette only processes it for the purposes for which it was provided (subject to applicable law), and Alouette does not collect and process Personal Information in connection with the Site other than as described in this Privacy Policy or as permitted or required by law, including the Act.
- **Limited access:** Subject to applicable law, only Alouette’s employees, representatives and Authorized Subcontractors with a “need-to-know” will have access to Personal

Information, and such access will be given in accordance with the law and following the implementation of proper measures.

- **Authorized Subcontractors:** Authorized Subcontractors are required to ensure the protection of Personal Information to which they have access in the performance of their obligations, and to comply with applicable law.
- **Privacy impact assessments:** Privacy impact assessments are conducted when required and in accordance with applicable law.
- **Securing data in transit:** Should Personal Information be communicated, then a HTTPS or reCAPTCHA protocol will be used to transfer Personal Information, and the SSL technology will be used to protect it by using server authentication and data encryption. This can be confirmed by looking: (i) at the address bar which will, depending on the browser, have a lock sign to the left of the Website address (URL); and (ii) at the URL or the address bar of the browser, where the first characters should change from “http” to “https”.
- **Secure data centres:** The Website is hosted on a secure and private platform provided by a recognized IT provider.
- **Confidentiality incident:** If Alouette has reasons to believe that a confidentiality incident involving Personal Information has occurred, then Alouette will take reasonable steps to reduce the risk of harm and prevent future incidents. If such incident presents a risk of serious harm being caused, then Alouette will notify the Commission d'accès à l'information and the persons concerned. Alouette may also notify any person who could reduce this risk (by communicating only the necessary Personal Information). Finally, Alouette will comply with the other requirements set forth in the Act.

4.2 General Considerations

Despite the foregoing, Users must keep in mind that **no technology is infallible or fully protected against unforeseeable or force majeure events, cyberattacks or unauthorized uses and access, and that there is a risk in transmitting any data electronically. This risk is inherent in all communications of data, including e-communications. Consequently, Alouette cannot guarantee that such data will never be intercepted or viewed or subject to other incidents. In addition, events affecting devices or systems may occur, pursuant to which devices or systems can be accessed or controlled by unauthorized persons, and undesirable communications and invitations may be received. Should a user receive a communication that looks like it is from Alouette asking for personal information, the user shall avoid responding to such communications. Alouette will never request financial and other sensitive information that way. If the user has communicated personal information in response to a suspicious e-mail, pop-up or phony website claiming to be affiliated with Alouette or if any of the foregoing events takes place, please contact Alouette immediately.**

It is also the responsibility of each individual to take steps reasonably required to protect their Personal Information.

5. Storage of personal information

Subject to applicable law, Alouette shall retain and store Personal Information for use and disclosure consistent with this Privacy Policy, as long as necessary for the purposes detailed herein. To that end, Alouette may retain Personal Information after a specific purpose has been fulfilled if reasonably necessary: (i) to comply with applicable law or prevent infractions; (ii) to resolve disputes; and (iii) to enforce this Privacy Policy. Once no longer required, the Personal Information will either be erased or retained on an aggregated and anonymized basis.

6. Third-Party Websites

Links to third-party websites are provided on the Website. Alouette is not responsible for the information available on these third-party websites and cannot guarantee/warrant that such information is accurate. These websites are not under the responsibility of, and their features and content are not controlled by, Alouette. This privacy policy is not applicable to these websites: You must review their policies.

7. Users' rights and how to contact Alouette

7.1 Users' rights

Subject to applicable law, Alouette will confirm the existence of any Personal Information it holds about You following receipt of Your request to that effect, and will communicate applicable Personal Information (e.g., by allowing You to take a copy of it). You may request a correction, or exercise any other rights by contacting Alouette and complying with applicable legal requirements.

In order to process Your request, Alouette may need additional information to confirm Your identity.

In certain cases, the law can allow or require Alouette to refuse to grant You applicable right (of access, etc.). Likewise, information will not be accessible once destroyed according to Alouette's practices (see Section 5). If Alouette is unable to comply with a request, the reasons for such refusal will be disclosed, subject to any applicable law.

7.2 Communications with Alouette

You can contact Alouette as follows:

- **Questions, comments and requests:** Should You have any questions, comments or requests regarding the protection of Your Personal Information, then You can contact the person in charge of the protection of Personal Information, using the contact information set forth below:

Person in charge of the protection of Personal Information:
questionconfidentialite@alouette.qc.ca

Requests will be processed diligently and within the applicable legal timeframes. You may refuse or withdraw Your consent to the collection or other processing of Personal Information, or request the deletion of Personal Information at any time (with reasonable notice) and subject to any legal requirements.

- **Complaint:** You may file any complaints to the person in charge of the protection of Personal Information (see contact information above). You must provide Your name, the type of complaint and any details deemed relevant to the complaint. The person in charge of the protection of the Personal Information will then review the complaint. If necessary, the person in charge of the protection of the Personal Information will contact You to obtain additional information, as required. Following the investigation, You will be informed of the result of such investigation. You can also contact the Commission d'accès à l'information; in such a case, the complaint must be made in writing according to the applicable process (see in particular the information available [here](#)).
- **Unsubscribe from e-mails:** This can be done at any time by using the contact information available [here](#), or by clicking on the unsubscribe mechanism provided at the bottom of each e-mail or by replying to an e-mail received with the word "Stop" or "Unsubscribe".

8. Other provisions

8.1 Changes

Alouette reserves the right to modify its Privacy Policy at any time and without notice. These amendments will be made available as per the mechanism set forth in the Act. If You do not agree with these changes, then You must stop accessing and using the Website prior to such changes becoming effective; thereafter, any access to and use will constitute acceptance of such changes.

8.2 Severability

If a provision conflicts with applicable law or is not enforceable, that provision will be severable from the remaining provisions and will be deemed rewritten to be valid and enforceable while respecting, as far as possible, its original intent.

8.3 Force majeure

Alouette is not responsible for any damages caused by a force majeure event.

8.4 Applicable laws

This Privacy Policy is governed by the laws in force in Quebec, excluding any rules or principles that may lead to the application of foreign laws. Any disputes which cannot be resolved by direct and good faith negotiations shall be submitted to the courts of the Province of Quebec, which shall have exclusive jurisdiction to decide such dispute.

Approved by the person in charge of the protection of Personal Information | REVISION 00 : 2024-06-10