

## Privacy Policy

Protecting your privacy is important to Manoir Lac Brome (hereinafter the “**Organization**”, “**we**”, “**our**”). For this reason, we have implemented safeguards and sound management practices to maintain the confidentiality and security of your personal information in accordance with applicable laws.

This privacy policy (the “**Policy**”), which should be read in conjunction with our Terms and Conditions and the applicable Service agreements entered into by the Organization, describes our practices regarding the collection, use, processing, disclosure, and retention of Personal Information (as defined below) of our clients, visitors and users.

By using our website ManoirLacBrome.com (the “**Website**”) or any of our Services, you agree that we may collect, use, process, disclose and retain your Personal Information in accordance with the terms and conditions described herein. If you do not agree to comply with and be bound by this Policy, you may not visit, access, or use our Website or Services or share your Personal Information with us. However, we invite you to contact our Data Protection Officer (“**DPO**”) to discuss an arrangement that may be suitable for you.

This Policy does not apply to Personal Information of the Organization's employees, agents, consultants, or any other person affiliated with the Organization, or to any information that is not Personal Information as defined by applicable law.

### **Purpose of this Policy**

This Policy aims to inform you regarding what personal information we collect by technological means, how we process it, and when we need to communicate it to subcontractors or third parties.

The term "personal information" refers to any information about a natural person that reveals, directly or indirectly, something about that person's identity, characteristics or activities. Examples include your name, date of birth, personal e-mail address, financial information and personal identification numbers.

### **Contact Us**

Any questions, comments, requests, concerns, exercise of rights or complaints regarding this Privacy Policy should be directed to our Privacy Officer at the following coordinates

**Email:** vieprivée@manoirLacBrome.com

**Address:** Manoir LacBrome, 28 MontÉcho, Knowlton, QC, J0E 1V0 450-242-4663 #1  
Processing of Personal Information

### **Collection of Personal Information**

#### **You consent to share your personal information with us**

Your privacy and the confidentiality of your data are of paramount importance to the Organization. That is why we have developed this Policy to tell you what Personal Information we collect, how we process it, when we need to share it with Service Providers or third parties, and when we will ultimately delete or destroy it.

By consenting, you authorize the Organization to collect and process your Personal Information that is necessary to provide you with our Services. Please be assured that you remain in control of your personal information at all times and that the consent you give us to collect or process your personal information may be withdrawn at any time. We will ensure that we respect your choice in accordance with our legal obligations. To do so, simply let us know or tell us when the information is collected on paper, verbally or in the presence of a member of our staff. You may also inform our Customer Service department and indicate your refusal to the collection. Please note, certain Personal Information is necessary for our operations and your refusal may result in our inability to serve you.

In addition, it is important to read this Policy in conjunction with our Website Terms of Use.

In the course of our business, we may collect, process and/or use different types of Personal Information that you provide us as permitted by law including, but not limited to, the information listed below:

- When browsing our Website;
- When visiting our places of business;
- When using Wi-Fi in our places of business;
- When communicating with us by telephone or live chat;
- When interacting via social media and e-mail;
- When interacting on websites such as our Facebook page
- When interacting with our authorized representatives;

### **Personal Information Collected**

In the course of our activities, we may collect, process and use various types of personal information. We strive to limit the collection of personal information to that which is necessary to provide our services to you or which is permitted by law.

The personal information we collect includes:

#### **Via our Website or Forms**

- Contact information, such as your first and last name, address, e-mail address, and telephone number when requesting information about our services at Manoir Lac Brome.
- Information automatically collected through the use of our Website and Services, including:
  - Website usage and other technical data, such as your IP address, the pages you visited, the time and date of your visits, the type of browser you were using, the operating system of your device and other hardware and software information;
  - Geolocation data, such as your IP address, a precise or approximate location determined from your IP address or the GPS of your mobile device (depending on your device settings).

\*\*Personal Information may also be collected by our Internet payment partners, including BMO .

**In various interactions with us:**

- Contact information, such as your first and last name, email address, telephone number, address in order to open a file and/or sign a lease
- Tax-related information, including your income in order to apply for the At Home Service Tax Credit for Seniors.
- Transaction and payment information, such as the payment method used, date and time, payment amount, billing zip code.
- Information you choose to provide or share with us, for example, when you fill out a form or contact one of our employees or representatives, including your preferences or interests;
- Professional or employment-related information, such as your resume, criminal history information, and other information you provide to us when you apply for a job at the Organization

**Use of Personal Information**

**In general, we only use your Personal Information for purposes allowed or required by law, or for the following purposes:**

- Allow you to subscribe to apply for a job, answer your questions, gather opinions and comments or provide you with assistance when needed;
- For the purposes of verifying your identity, personal background, as permitted by law, or to comply with our obligations under applicable laws and regulations;
- Send messages, updates, security alerts or transmit communications as permitted by law;
- Detect and prevent fraud, error, spam, abuse, security incidents and other harmful activities;

We will always respect the purposes for which we have collected your personal information. If we wish to use or disclose your personal information for other purposes, we will seek your consent, except as permitted by law.

**Disclosure of Personal Information**

In the course of our activities, we make your personal information available to our employees, consultants or agents whose duties so require.

Although we try to avoid sharing your personal information with third parties, we may use service providers to perform various services on our behalf, such as IT management and security, and data analysis, hosting and storage. In such circumstances, we provide only the personal information necessary for the performance of their mandate, and we are committed to ensuring that the principles set out in this Policy are respected.

In addition, these service providers provide us with sufficient guarantees that they have implemented adequate safeguards for the protection of your personal information processed or communicated

before your personal information is communicated to them. When our service providers no longer need your personal information, we ask them to destroy it in an appropriate manner.

We do not sell, trade or otherwise disclose your personal information to third parties, subject to exceptions provided by law.

### **Retention of Personal Information**

Subject to applicable law, we retain your Personal Information only for as long as necessary to fulfill the purposes for which it was collected, unless you consent to your Personal Information being used or processed for another purpose. In addition, our retention periods may be modified in a timely manner due to legitimate interests (e.g., to ensure the security of Personal Information, to prevent abuse and breaches or to prosecute criminals).

For more information on how long your Personal Information is retained, please contact our DPO using the contact information provided in section 1.2 of this Policy.

### **Your Rights Regarding Your Personal Information**

The law provides you with the following rights regarding your personal information:

- You have the right to be informed of the Personal Information we hold about you and to request a paper copy of the documents containing your Personal Information, subject to the exceptions provided by applicable law;
- You have the right to have the Personal Information we hold about you rectified, amended and updated if it is incomplete, equivocal, out of date or inaccurate;
- You have the right to withdraw or change your consent for Manoir Lac Brome to collect, use, disclose or retain your Personal Information at any time, subject to applicable legal and contractual restrictions.
- You have the right to ask us to stop disseminating your Personal Information and to de-index any link attached to your name that provides access to that information if such dissemination violates the law or a court order;
- You have the right to file a complaint with the Organization regarding the protection of your personal information;
- You have the right to file a complaint with the *Commission d'accès à l'information*, subject to the conditions set out in the applicable law.

In order to comply with your request, you may be asked to provide appropriate identification or otherwise identify yourself, as required by law.

To exercise any of these rights, please contact us as indicated in the "Contact us" section.

### **Security Measures**

Manoir Lac Brome has implemented physical, technological and organizational security measures to adequately protect the confidentiality and security of your personal information against loss, theft or any unauthorized access, disclosure, reproduction, communication, use or modification. These measures include controlling access to our offices and equipment, setting up a secure connection between your device and our server on our Website, making Manoir Lac Brome employees aware of this Policy, obtaining their commitment to comply with it and to respect the confidentiality of your personal

information, and adopting governance measures aimed in particular at the secure storage and destruction of your personal information.

In addition, we limit access to your personal information to those staff members who need it to perform their duties. These people only have access to the information they need to perform their duties.

Despite the adoption of such measures, we cannot guarantee the absolute security of your Personal Information. If you have reason to believe that your Personal Information is no longer secure, please contact us immediately as indicated in the "Contact us" section.

### **Limitation of Liability**

Manoir Lac Brome undertakes to take all reasonable measures to ensure a level of confidentiality and security of Personal Information in accordance with technological standards appropriate to its sector of activity and the sensitivity of the data collected.

Notwithstanding the foregoing, you acknowledge that no computer system offers absolute security and that there is always a degree of risk involved in transmitting Personal Information over the public Internet.

You agree that Manoir Lac Brome cannot be held responsible for any breach of confidentiality, hacking, virus, loss, theft, misuse or alteration of Personal Information transmitted or hosted on its systems or those of a third party. You also agree to waive all claims in this regard, except in the case of gross negligence or intentional misconduct on the part of Manoir Lac Brome. Accordingly, you agree to hold Manoir Lac Brome and its officers, directors, affiliates and business partners harmless from any damages of any kind, whether direct or indirect, incidental, special or consequential, arising out of the use of your Personal Information.

In the event of a Privacy Incident involving your Personal Information that poses a high risk to your rights and liberty, you will be notified of such breach as soon as possible, and Manoir Lac Brome will take appropriate steps to preserve the confidentiality and security of your Personal Information.

### **Cookies and other tracking technologies**

We use cookies and similar technologies (collectively, "**Cookies**") to help us operate, protect and optimize the Website and the services we offer. You can set your browser to notify you when you visit the Website so that you can decide whether or not to accept some or all Cookies.

Among the Cookies we collect via our Website are the following:

- **Functionality cookies:** These cookies enable the Website to remember the choices you make (such as your username, preferred language, etc.) to provide you with a personalized and enhanced experience on future visits.
- **Analysis cookies:** these help us analyze and understand how you use our website, so that we can improve its usability, functionality and content.
- **Advertising cookies:** These cookies are used to display relevant advertising based on your interests and browsing history.

## **Updating Our Privacy Policy**

We reserve the right to modify this Policy at any time in accordance with applicable law. In the event of a change, we will post the revised version of the Privacy Policy, update its effective date, and provide notice of the update on the home page of our Web Site. The notice will indicate the date of its publication, the general purpose of the changes made and the date on which the changes take effect.

We encourage you to review this Policy whenever you access our Web Site to stay informed about our safeguards and practices for handling your personal information.

If you do not agree to the new terms of the Privacy Policy, please do not continue to use our Web Site and services. If you choose to continue using our Web Site or services after the new version of our Policy becomes effective, your use of our Web Site and services will be governed by the new version of the Policy.

This Policy was last updated on March 28, 2024