

<b>Title</b> <i>Privacy Policy and Protection of Personal Information</i>	<b>Approval</b> Board of Directors	<b>Date of first approval</b> May 9, 2023
	<b>Revision dates</b> <ul style="list-style-type: none"> <li>• Amended on December 13, 2024; effective January 1, 2025</li> <li>• Amended on December 22, 2025; effective December 23, 2025</li> </ul>	
<b>Vice-presidency responsible</b> Governance and Risk Management	<b>Comments</b> n/a	

## 1. SCOPE AND APPLICATION

Fondaction, le Fonds de développement de la Confédération des syndicats nationaux pour la coopération et l'emploi ("**Fondaction**") is committed to protecting the privacy of individuals and the confidentiality of the personal information it collects, holds, uses or communicates. The purpose of the Privacy Policy and Protection of Personal Information (the "**Policy**") is, among other things, to describe in general terms the practices and measures relating to the manner in which personal information is collected, held, used, communicated or otherwise processed or deleted, how Fondaction maintains the confidentiality of such information and how an individual may exercise their rights and choices with respect to their personal information.

The Policy is governed by the *Act respecting the protection of personal information in the private sector* and is supplemented by the Legal Notice—Terms of Use of Fondaction's website, by Fondaction's *Politique de gestion et sécurité de l'information* (Information Management and Security Policy), by the prospectus and by various directives, procedures and instructions. In addition, various products, services or applications may be subject to specific conditions.

The Policy applies to all Fondaction activities. As such, it applies in particular to any individual who is or has been: a user of its website, a shareholder, a beneficiary, a group representative, a remittance officer, a job applicant, an employee, a Fondaction representative, a Fondaction regional representative, a director or a committee member. It also applies with respect to personal information collected in the course of its activities on contacts or third parties, for example, in connection with the administration of an account, in respect of a shareholder's spouse, legal representative, designated beneficiaries or individuals who may be concerned by an application. It also applies to personal information that Fondaction receives from a group pension or savings plan, a subsidiary, another entity of the same group, a partner entity or another third party whose products, services or activities are related or complementary to those of Fondaction.

In some cases, at the time of collection of personal information, for example, when a form is used, Fondaction may provide additional information regarding the processing of personal information or stipulate specific terms and conditions. Fondaction may also, in some circumstances, obtain specific verbal or written consent to the use or communication of personal information, including where required by law.

## 2. NOTION OF “PERSONAL INFORMATION”

The term “personal information” generally means information concerning a natural person and allowing, directly or indirectly, that person to be identified. Anonymized information that cannot be associated with an identifiable individual, either directly or indirectly, does not constitute personal information. In accordance with the law, for the purposes of certain passages of the Policy, information that relates to the exercise of a function within a company, such as certain business contact details, is also excluded.

## 3. OUTSOURCING TO THE COMBINATION

Effective on or around January 1, 2025, Fondaction has entrusted 9525-9495 Québec Inc., also known as “Le Regroupement entre Bâtirente et Fondaction” (The Bâtirente and Fondaction Combination), a legal entity governed by the *Business Corporations Act*, registered in the Registre des entreprises du Québec under number 1180227242, as well as its successors or assigns (hereinafter, the “**Combination**”), with the performance of various activities for and on behalf of Fondaction. These activities include collecting, storing, using, or communicating personal information for and on behalf of Fondaction.

Consequently, certain parts of the Policy must be interpreted or read with the necessary adjustments to account for the activities carried out under this outsourcing arrangement.

## 4. CATEGORIES OF PERSONAL INFORMATION COLLECTED

Fondaction limits the collection of personal information to what is reasonably required to fulfill the purposes for which it was collected.

Fondaction may collect, hold, use or communicate various information depending on the nature of an individual’s relationship with Fondaction, for example, a shareholder, a website user or an employee, including, but not limited to:

- **Identification and authentication information**, such as name, postal address, social insurance number, date of birth, designation of sex, phone number, email address, employer, occupation, employee number, marital status, signatures (handwritten, electronic or digital), passwords and other authentication methods, and government identifiers such as driver’s licence number.
- **Information related to products and services or applications**, such as shareholder number; application number; shares subscribed, purchased, redeemed or transferred; account balances; persons authorized to access the account; information related to transactions and operations; banking or other external account information; identity of designated beneficiaries; history and record of communications.
- **Information related to personal circumstances**, such as that required to validate eligibility for an application to redeem, purchase or transfer under the terms and conditions more fully described in the prospectus, including, for example, a document attesting to disability or terminal illness, proof that all redeemable investments have been liquidated, proof of an extraordinary and unexpected necessary health expense, information relating to the dissolution of a union, etc.
- **Information collected for checking purposes**, including money laundering, sanctions, financial crimes and fraud prevention checks, such as those resulting from checks required under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*, or as part of background checks or due diligence.

- **Web or other activity information**, such as browser type, Internet service provider, referring/exit pages, pages viewed on the website, responses to online surveys or consultations, or comments collected on Fondation digital platforms.

## **5. COLLECTION OF PERSONAL INFORMATION**

Fondation collects personal information in a variety of ways, including directly from the individual concerned, from third parties and through its website, or otherwise, including where permitted by law. Fondation can also generate new information using information already collected.

Fondation may, but is not limited to, collecting personal information from the following general sources:

### **a. Directly from the individual**

Fondation may collect personal information directly from the person concerned or their legal representative, including when they:

- submit an application and subscription form to become a Fondation shareholder or contribute to a spousal RRSP;
- carry out transactions relating to an account, e.g. subscription of shares, redemption, purchase or transfer;
- subscribe to a newsletter or other mailing list;
- fill out a website form, a survey, a consultation or provide comments on digital platforms;
- hold a job, office or position.

Individuals are not required to provide Fondation with their personal information when requested, but Fondation may not be able to provide them with certain products and services or to process an application, including issuing shares to such individuals.

Telephone conversations involving Shareholder Services or Employer Services representatives may be recorded or listened to for compliance, quality control and other purposes. The person concerned is given prior notice that the conversation may be recorded and of the purpose of the recording. Anyone who doesn't want the call to be recorded can consider other avenues, such as using online services.

### **b. From third parties**

In some circumstances, Fondation may collect personal information from third parties, such as an employer, a financial institution, an information agency, a credit reporting agency, another labour-sponsored fund, a Fondation representative or a Fondation regional representative, a group pension or savings plan, a trustee in bankruptcy, a subsidiary, another entity of the same group, a partner entity or another third party whose products, services or activities are related or complementary to those of Fondation, a service provider, a public agency, a legal representative, etc. Fondation may also collect, through a shareholder, information about another individual, such as their designated beneficiary or beneficiaries, mandatary, spouse, etc.

Each third party and shareholder is responsible for ensuring and guaranteeing that they are authorized to provide Fondation with such information and have obtained the free and informed consent of the person concerned for the collection, use and communication of their personal information when required by law.

### **c. Through its website**

The use of the website can allow Fondaction to automatically compile certain information concerning a user profile, which may include the Internet protocol address (or IP address) of a computer, a geolocation zone, the operating system used, the name of the Internet service provider, the date and time a person accessed the website, the previous website visited insofar as it provided a link to the Fondaction website, as well as the content viewed and downloaded on the Fondaction website. To this end, the Fondaction website, like most websites, uses tracking cookies, which are small data files that are stored on a computer when it is visited. Use of the website is also subject to the Legal Notice—Terms of Use and other conditions posted online from time to time.

## **6. USE OF PERSONAL INFORMATION**

With the consent of the person concerned, or as permitted or required by law, Fondaction may use personal information for the following purposes or for any other compatible or reasonable purposes, or for any other purposes specified in a consent:

### **a. General purposes of Fondaction**

Fondaction may use personal information for its general business purposes, such as:

#### **Providing or delivering products and services or handling applications**

- Identifying a person in order to open or access an account, for example, by telephone or through a secure portal;
- Carrying out transactions related to an account, e.g. subscription of shares, redemption, purchase or transfer, the issuance of statements or tax slips, payment of a designated beneficiary;
- Validating the eligibility of an application;
- Establishing and maintaining a business relationship and managing the compliance of products and services offered;
- Answering any questions, comments, suggestions or complaints;
- Providing information on products and services that may be of interest and, more generally, financial literacy content on savings and retirement, and assessing applications for products or services, including determining whether or not a product or service can be offered;
- Allowing access to certain group benefits offered to Fondaction shareholders, including group pension and savings plans offered by the Comité syndical national de retraite Bâtirente inc. (“Bâtirente”);
- Transferring money to or from a financial institution;
- Communicating information related to Fondaction shares.

#### **Managing business operations**

- Preventing errors and fraud and meeting legal requirements;
- Exercising due diligence to prevent or reduce commercial risks, comply with good governance requirements or manage and audit business operations;
- Ensuring information, system or network security;
- Complying with legal obligations, in particular legislation applicable for opening an account, including validation of the account holder’s identity;
- Investigating or assisting with investigations;
- Informing the competent authorities and collaborating with them when required;
- Responding to requests, warrants and orders from courts or agencies that have the power to compel Fondaction to share information, in particular, in the context of

- information requests or seizures;
- Collecting amounts due;
- Responding to audits, evaluations, requests or legal requirements.

### **Managing the website**

- The website may use information to manage and facilitate its use, which may include tracking cookies and other technologies to tailor the website to preferences and to compile statistics about its consultation and use in order to improve it, such as analysis tools like Google Analytics and similar technologies. Statistics may include the number of visits, the average time of each visit and the pages visited.

### **Managing the file of an employee, a representative, a committee member, a director or certain consultants**

- Verifying identity, background and, in some cases, diplomas obtained;
- Responding to applications and communicating with the applicant, the incumbent or a former incumbent;
- Evaluating an application;
- Concluding an employment contract or any other contract;
- Processing payrolls, deductions and applicable contributions, and paying all sums due;
- Coordinating enrolment in a group insurance plan or a group pension or savings plan, including calculating amounts payable upon retirement or otherwise, such as a termination;
- Managing performance or professional development;
- Ensuring health and safety compliance, monitoring, preventing violence, handling complaints or managing administrative, disciplinary or legal measures.

### **Administering an investment, a reinvestment or a divestment**

- Conducting a background check;
- Performing due diligence;
- Appointing or recommending the appointment of a director, an officer or a committee member.

#### **b. Continuous improvement purposes**

Fondaction may use personal information to enhance customer experience and improve or develop its range of products and services, including the use of the website. This can include generating statistics to better understand and assess interests and needs. In some cases, this use of information may be carried out on a de-identified or anonymized basis.

#### **c. Personalized communications, promotional purposes, and engagement**

Fondaction may use personal information to provide content tailored to the profile of the person concerned, by email or other channels, including recommendations, offers, contests, or consultations relating to its products and services or, where applicable, those of certain partners or other third parties whose products, services or activities are related or complementary to those of Fondaction. Personalization may be based on information such as age, mailing address or other details provided by the person concerned or derived from their relationship with Fondaction.

Fondaction may also use personal information to communicate with its shareholders or other individuals, for example, by email, telephone, text message, mail or via the online account, regarding products, services, recommendations, special offers, promotions, contests or events

that may be of interest to them.

Fondaction includes an unsubscribe procedure in its commercial electronic messages, allowing anyone to stop receiving them. This does not apply to communications about products held or administrative communications necessary for the proper management of the matter at hand or made in accordance with the law.

## **7. COMMUNICATION TO OTHER INDIVIDUALS OR ORGANIZATIONS**

Fondaction may communicate personal information to its mandataries, service providers (including in the context described in section 3), subsidiaries or other entities of the same group, to Fondaction representatives or Fondaction regional representatives, to partner entities and to other third parties, including Bâtirente, whose products, services or activities are related or complementary to those of Fondaction, to a shareholder's employer and to other individuals or organizations in accordance with the law. Fondaction may only communicate information to Bâtirente that is necessary to confirm shareholders' eligibility for the group pension and savings plans offered by Bâtirente, and to enable shareholders to enroll online. Once this information has been provided, Bâtirente and its service providers process it in accordance with their respective privacy policies.

Service providers who may receive personal information include, but are not limited to: consulting companies; human resources management companies; training companies; account and tax statement preparation companies; postal and courier companies; scanning companies; document storage companies; cloud or other data storage providers; software suppliers; IT maintenance and consulting services; portfolio management systems; annual meeting participation systems, including vote counting; trust companies; market intermediary or archiving services.

When Fondaction communicates personal information to third parties such as mandataries or service providers, it stipulates by contract, in accordance with the law, that the personal information communicated must be used only for the purposes of fulfilling the contract and that it must benefit from reasonable protection measures, taking into account, for example, its sensitivity, use or quantity. Such third parties may be required to provide reasonable assurance that their information security and data protection controls are adequate for this purpose. In some circumstances, Fondaction may also communicate personal information to an individual—such as a tutor, a mandatary or a trustee in bankruptcy—who, in Fondaction's reasonable opinion, is acting as a representative of another individual.

Fondaction may also communicate personal information where permitted or required by law, for example:

- With governments; governmental bodies or agencies; or law enforcement agencies when required by law—as in the case of communication for tax purposes to the Canada Revenue Agency or to Revenu Québec, or in securities matters to the Autorité des marchés financiers.
- With individuals; organizations; fraud prevention agencies; regulatory or governmental bodies or agencies; money laundering and terrorist financing prevention and deterrence organizations such as the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC); database or registry operators used to cross-check information provided against existing information; insurers, financial institutions or lending institutions to validate eligibility or to detect or eliminate financial abuse, fraud and criminal activity, to protect Fondaction's assets and interests, to assist in internal and external

investigations of potentially illegal or suspicious activities, or to manage, defend against or settle actual or potential losses related to any of the foregoing. For these purposes, personal information may be grouped together with data belonging to other individuals, and may be subject to data analysis.

In all cases, Fondation does not sell the personal information entrusted to it in the course of its activities.

## **8. CHOICES REGARDING THE USE OF PERSONAL INFORMATION**

An individual may, in some cases, choose how Fondation handles their personal information.

### **a. Activities requiring optional consent**

In some circumstances, Fondation may collect, use or communicate personal information for purposes that are not strictly necessary to provide a requested product or service or to process an application submitted to Fondation. These purposes may include the presentation of recommendations, promotions, special offers, consultations, contests or surveys. They may also include activities to encourage Québec workers to save more for their retirement, or activities aimed at better understanding the different profiles of shareholders, particularly in the context where the subscription of shares with Fondation benefits, under certain conditions, from tax assistance in the form of tax credits.

Insofar as personal information is processed for these purposes, Fondation will rely on optional consent. This means that the person will have the opportunity to decide whether their information can be processed for these purposes, unless applicable laws allow Fondation to process the information without prior consent.

An individual may always choose to withdraw their consent to the collection, use and communication of personal information for these purposes by following the terms and conditions set out in this Policy or, where applicable, those that will be communicated to them from time to time to this effect.

### **b. Changing communication preferences**

An individual may elect not to receive commercial or promotional messages from Fondation by email by clicking on the unsubscribe link in the correspondence sent.

Despite this election, Fondation may communicate with an individual regarding a product held or an application submitted or for administrative communications required for the proper management of the matter at hand in accordance with the law, for example, to send a customer service message, important information, notices of statement or document availability, and reminders.

Fondation will process any change in preferences, generally within ten (10) business days of the request.

### **c. Changing browser settings on a device**

It is possible to erase tracking cookies from the hard drive of a computer or mobile device, to block the creation of tracking cookies or to receive a warning before a tracking cookie is stored. An individual can remove or disable some of these technologies at any time through their browser. If someone wishes to deactivate Google Analytics, they can use the Google deactivation add-on located at <https://tools.google.com/dlpage/gaoptout>. However, in the event of removal or deactivation of some of these technologies, some of the features of the website and digital platforms may no longer be functional or accessible.

Users are invited to refer to their browser instructions or help screen to find out how to block, delete and manage tracking cookies on their computer or mobile device.

**d. Restriction on the collection, use and communication of personal information**

For situations other than those described above, any individual may withdraw their consent to the collection, use and communication of personal information in accordance with the Policy at any time upon reasonable notice to Fondation in writing, subject to legal or contractual restrictions.

However, the withdrawal of consent may affect Fondation's ability to offer or provide products and services to an individual or to respond to an application. In some circumstances, legal or contractual requirements may prevent a person from withdrawing consent, for example, to the extent that information is required to satisfy tax or compliance obligations.

## **9. PERSONAL INFORMATION SAFEGUARDS**

Fondation's *Politique de gestion et sécurité de l'information* (Information Management and Security Policy) and various other directives, procedures and instructions govern the protection of personal information at Fondation.

Without limiting the scope of the foregoing, Fondation takes reasonable measures to ensure the confidentiality of personal information and, as such, implements a series of security measures to protect personal information against loss or theft, as well as against any unauthorized consultation, communication, reproduction, use or modification. These security measures include physical measures (e.g. office access cards for employees, data backup and archiving using an external system, etc.), administrative or organizational measures (such as data confidentiality and data security training) and technological measures (such as the use of passwords, firewalls, data encryption, SSL protocol, network monitoring, etc.) that are reasonable given the sensitivity of the information, its use, quantity, distribution and medium.

Fondation also takes the necessary steps to ensure that all its employees and those of the Combination are informed about the content of the Policy and its protection of personal information practises, and deploys identity and computer access management initiatives to determine which employees or other authorized individuals may access information assets and for what period of time.

However, as no mechanism offers flawless security, a degree of risk is inevitable.

Depending on the volume and sensitivity of the information, the purposes for which it is to be used and the medium on which it is stored, Fondation implements a combination of safeguards to protect personal information, including:

- Appointment of a person in charge of the protection of personal information who assumes the roles and responsibilities set out in the *Act respecting the protection of personal information in the private sector* and who ensures, among other things, that Fondation complies with applicable protection of personal information legislation;
- Procedures for receiving, investigating and responding to complaints or applications regarding Fondation's information handling practices, including those related to any incident involving personal information;
- Contractual measures, security questionnaires and other tools to ensure that suppliers with whom Fondation shares personal information have adequate security measures in place.

## **10. STORAGE OF PERSONAL INFORMATION**

Fondaction retains personal information to provide products or services or to respond to applications submitted, to manage its business activities, including, in particular, for the performance of a contract or for any other legitimate interest of Fondaction or to comply with its legal obligations. Once the purposes for which the personal information was collected or used have been fulfilled, and subject to preservation periods set out in other legislation, the *Act respecting the protection of personal information in the private sector* stipulates that this information must be destroyed or anonymized, so that it can no longer identify an individual.

## **11. TRANSFERS OF PERSONAL INFORMATION OUTSIDE QUÉBEC**

Generally speaking, personal information is held (data at rest) in Canada, whether in Québec or in another province. Notwithstanding the foregoing, it may also be held in any country where Fondaction's service providers operate and to the extent necessary for their functions or services.

As a result, some Fondaction suppliers may access, use or store personal information outside Québec. In such a situation, the safeguards described in Section 9 apply, but the fact remains that personal information so communicated may be subject to the laws of a foreign state, including any laws allowing or requiring communication of the information to governments, government agencies, courts and law enforcement agencies of that state.

## **12. REQUEST FOR ACCESS, RECTIFICATION, MODIFICATION OR DELETION, OR COMPLAINT RELATING TO PERSONAL INFORMATION**

Subject to certain legal exceptions, any individual may have access to personal information concerning them, request the rectification of inaccurate information and request the correction or deletion of their personal information if its collection, use, communication or retention is not authorized by law. Any individual may also file a complaint regarding the protection of personal information.

Anyone who finds that information in their file is inaccurate is invited to promptly contact Fondaction to have it corrected, or, if applicable, to use their online account for this purpose. To exercise any other right provided for in this section, any individual is invited to communicate with Fondaction using the contact information provided in Section 14.

The person concerned may be charged a reasonable fee for the transcription, reproduction or transmission of information. Should Fondaction intend to charge such fees, it will inform the person concerned of the approximate amount due before proceeding.

## **13. CHANGES TO THE POLICY**

Fondaction may amend the Policy at its sole discretion. Any changes are effective when they are posted on its website. In accordance with the law, additional terms and conditions may apply. By continuing to interact with Fondaction after the new version of the Policy has been posted, any individual will be deemed to have accepted the changes to the Policy, subject to any additional requirements that may apply. Each individual is responsible for ensuring that they have read and understood the Policy and any amendments thereto.

## **14. CONTACT INFORMATION**

General questions about privacy and the protection of personal information can be submitted as indicated below:

- by phone: 514-525-5505 or toll-free 1-800-253-6665;
- by mail: 2175 De Maisonneuve Boulevard East, Suite 103, Montréal, Québec H2K 4S3.

With the exception of specific cases, such as a request to update a shareholder file, all requests for access, rectification, modification or deletion and all complaints must be submitted in writing to the person in charge of the protection of personal information as indicated below:

- by email: [confidentialite@fondaction.com](mailto:confidentialite@fondaction.com);
- by mail: 2175 De Maisonneuve Boulevard East, Suite 103, Montréal, Québec H2K 4S3.

The person in charge of the protection of personal information shall respond promptly to any request submitted to them, generally within thirty (30) days of receiving the written request. If this person is unable to respond to a request, in whole or in part, the reason is to be provided to the individual who made the request.

## **15. PERSON IN CHARGE AND REVIEW**

In accordance with the provisions of the *Act respecting the protection of personal information in the private sector*, the Policy has also been approved by the person in charge of the protection of personal information at Fondaction. The application and revision of the Policy are under their responsibility. The minimum revision frequency is every three (3) years, or more often if necessary.