

## Personal information confidentiality conditions

#### Effective date: September 2023

#### Last update: N/A, first publication

We understand how important your privacy is to you, and we're committed to maintaining the confidentiality of the personal information we collect about you in accordance with the highest standards of privacy protection. Rest assured that we do not under any circumstances sell the personal information we hold.

These personal information confidentiality conditions are about you. They describe how la Société des alcools du Québec (SAQ) collects, uses and discloses your personal information. They complete our <u>Personal information governance policy</u>. These personal information confidentiality conditions also explain how you can request access to your personal information or have it rectified, when necessary.

When you provide us with personal information via our websites, mobile applications, digital terminals or any other service involving the transmission of personal information, you agree to the processing of that information as described in these personal information confidentiality conditions. In some cases, we may ask you to give your express consent.

### What is "personal information"?

Personal information may, alone or in combination with other information, allow you to be identified directly or indirectly.

### How do we collect your personal information?

We collect your personal information when you

- visit our websites
- download one of our mobile applications
- enter information on our websites or mobile applications
- sign up for the SAQ Inspire program
- take part in our contests, promotions or events
- participate in one of our surveys or other customer studies



- agree to receive our newsletters, promotional emails, flyers, text messages or other communications about our products, services, promotions or events that may be of interest to you.
- use our in-store digital terminals
- purchase or return products to one of our stores
- contact our Customer Relations Centre or contact us by any other means to make a comment, question or complaint
- publish content on our social media accounts
- · show up at one of our stores, via our surveillance cameras

## What personal information do we collect and why?

We collect only the personal information we need to offer you our products and services.

Such information may be collected in connection with the use of our websites, mobile applications, digital terminals, participation in the SAQ Inspire program, visits to our stores and commercial transactions.

#### **Identity information**

#### Which ones?

- Last name
- First name
- Postal address
- Date of birth
- Email address
- Phone number
- User name
- Password
- Your image when you visit one of our stores

#### Why?

- Verify compliance with the age limit for buying alcoholic beverages
- Provide the products, services and information you request
- Manage your account
- Register for the SAQ Inspire program and ensure the proper management of the program as a whole
- Handle your orders properly
- Provide technological support
- Organize and invite you to events and promotional activities
- Answer your questions and comments
- Ensure the safety of people and property inside buildings under our control



#### **User information**

### Which ones?

- Internet Protocol address (IP)
- Information about your device
- Date, time and duration of your visits to our websites
- Pages and content viewed
- Navigation preferences
- Information as a participant in our surveys, activities or events
- Promotional offers, discounts and benefits you have enjoyed
- Information about your preferences

### Why?

- Operate, maintain, improve and offer all the functionalities of our websites
- Understand and analyze your usage patterns and preferences and, in some cases, provide you with personalized offers
- Design, improve or market products and services and new features and functionalities
- Recognize you on our websites, and our mobile applications and our digital terminals and identify your preferences
- For research, analysis and marketing purposes
- Run contests and surveys

#### **Purchasing information**

#### Which ones?

- Products and services purchased
- Delivery address
- Billing address
- Transaction history
- Payment information

#### Why?

- Finalize your purchase
- Process your payment information with the help of a third-party payment provider



#### In general...

We may need to use your personal information to:

- Meet our legal obligations
- Prevent cyberthreats and fraud
- Respond to requests, warrants and orders from courts and other bodies
- · Protect your rights and interests as well as our own
- Collaborate in legal proceedings or investigations

#### Nordic villages

In some northern villages, by-laws require a local authority to authorize the purchase of alcoholic beverages by its residents.

If you live in one of these villages, you must allow us to send a copy of your order to the relevant local authority, which will contain personal information about you, so that we can obtain confirmation that you're authorized to purchase alcoholic beverages.

If we wish to use your personal information for a purpose that is incompatible with those described in these personal information confidentiality conditions, we will obtain your consent before doing so.

### Do we use functions to locate you or personalize our content?

In certain situations, we use technology to locate you or offer you personalized content. To do so, we will ask you to give your express consent.

	When?
Location	When you want to find the store nearest you, or search for in-store product availability using the "Locate me" function.
Customized content	When you browse our websites or applications.
	We use technological tools to help us tailor our websites, mobile applications and digital terminals to your interests and preferences.
	Some of these technological tools are nevertheless activated by default to ensure functioning and security of our websites, applications and the transactions carried out on them. These tools also facilitate your browsing and process your orders.



#### When you join the SAQ Inspire program.

The SAQ Inspire program includes functions that allow us to tailor your client profile based on your purchase and browsing history. This allows us to make personalized offers based on your preferences.

Visit the "<u>SAQ Inspire</u>" section of <u>SAQ.COM</u> or the mobile application to join the SAQ Inspire program. If you wish to unsubscribe, go to the "<u>My account</u>" section.

## > To whom do we communicate your personal information?

In certain circumstances, we use service providers to help us serve you. Before sharing your personal information to them, we take appropriate measures to ensure that they undertake to comply with the required obligations regarding the protection of personal information.

We use the services of suppliers in the following areas:

Area	What they do for us
Payment services	Authorize purchases and process transactions securely.
Marketing and advertising	Generate targeted advertising and promotions relating to our products and services, based in particular on your preferences.
Data analysis	Analyze and improve our services through usage information.
Sending email	Manage the sending of emails, such as order confirmations, updates and newsletters.
E-commerce platform	Host our websites and mobile applications and ensure their ongoing smooth operation.
Delivery services	Deliver products ordered online.

**Management of points** Keep track of the points awarded and used during transactions.



• We may share your personal information in the event of actual or suspected fraud.

In the event of suspected fraud, we may share your personal information with the authorities.

#### • We may disclose your personal information in certain circumstances

In exceptional cases, we may disclose your personal information without your consent:

- if the law requires us to do so. For example, if we receive a court order to disclose your personal information.
- if it is impossible to obtain your consent and the law allows us to disclose your personal information.

Some of your personal information may be released outside Quebec province, where some of our suppliers may do business. We do not sell the personal information we have collected.

### How do we protect your personal information?

#### Measures

We have put in place physical, administrative and technical safeguards to protect the confidentiality and security of the personal information we hold, including preventing unauthorized access.

When you make a purchase from the SAQ, your payment information is transmitted by a secure method throughout the transaction.

#### Restricting access

Only authorized and qualified personnel who need to consult your personal information in the course of their duties have access to it. The following categories of persons may have access to your personal information:

- Customer Relations Centre employees
- Stores employees (when you present your Inspire card)
- Employees who are responsible of the sectors concerned by complaints, suggestions, or comments
- Legal department employees, to handle problem cases, such as complaints
- Information technologies department employees supporting IT applications and infrastructures
- Business intelligence and consumer insights team
- Administrative employees of the storage cellar and wine cellars department
- Employees of the prevention, investigation, and safety department
- SAQ.com employees
- Marketing employees



Private wine importations employees

In addition, our staff is required to comply not only with the law, but also with the SAQ's privacy protection requirements. Our staff must process this information solely for the purposes mentioned above.

#### Warning

Although we take security measures to prevent unauthorized access to your personal information, no security measure is absolute or completely guaranteed. If you have reason to believe that your interaction with us is no longer secure (for example, if you believe that the security of any information you have provided to us has been compromised), please contact us immediately at the address indicated in the "**How to contact us**" section below.

## How long do we keep your personal information?

We will keep your personal information only as long as necessary to fulfill the purposes described in these personal information confidentiality conditions, to comply with our legal obligations, to settle disputes and to enter into agreements with our agents or partners, all in accordance with our document retention schedule. Personal information will then be destroyed in a secure and confidential manner.

## What are your rights regarding your personal information?

#### Access, rectification and deletion

If you have an account with us, you can access your personal information via your online profile or on our mobile applications. You can modify and update it to keep it accurate.

If you experience technical difficulties in accessing or modifying your personal information, you may contact the **Customer Relations Centre**, at your convenience:

- Using the form on the Contact Us page on <u>SAQ.COM</u>
- By telephone at 1 866 873-2020
- By mail:
  Société des alcools du Québec
  7500 Tellier Street
  Montreal, Quebec H1N 3W5

#### Withdrawing your consent

You may also withdraw your consent to the use and disclosure of the personal information we hold about you. However, in this case, we may no longer be able to offer you certain products or services, such as your participation in the SAQ Inspire program, which allows you to collect points, consult your purchase history, receive exclusive offers and personalized benefits.



To exercise your rights of access and rectification under the Act respecting access to documents held by public bodies and the protection of personal information, you can also submit an official request, in writing, at <u>m.comtois@saq.qc.ca</u>

Please note that when you exercise your rights, we may require you to identify yourself by presenting a valid ID.

## How can I change my electronic communications preferences?

We undertake to manage email addresses responsibly and to use them in accordance with the law.

You can change your communication preferences in the "<u>My account</u>" section of our website or mobile applications. Each of our communications will give you the opportunity to remove your name and email address from our mailing list.

Furthermore, even if you unsubscribed from our commercial messages, the law authorizes us to send you emails and other electronic communications in certain specific situations.

## How to contact us?

If you have any questions or comments regarding the present privacy policy, if you wish to access, consult or rectify your personal information held by the SAQ or if you wish to avail yourself of the privacy complaint process provided for in our <u>Personal information governance policy</u>, please contact us at the following address:

Person in Charge of Access to Documents and Protection of Personal Information

Martine Comtois 7500 Tellier Street Montreal, Quebec H1N 3W5 By email: <u>m.comtois@saq.qc.ca</u> By phone: 514 254-6000, ext. 6645

### Can we update these personal information confidentiality conditions?

As privacy concerns, business practices and the law continue to evolve, we may need to change these personal information confidentiality conditions. If we make material changes, we will announce them by posting a notice of updated personal information confidentiality conditions on our website and by any other means likely to reach affected individuals at.

If our personal information confidentiality conditions change, the current version, as posted online, will apply to you.



# Official version

The French version of these personal information confidentiality conditions is the official version and prevails over the English version.

## What are our obligations?

The SAQ is a public organization subject to the Act respecting access to documents held by public bodies and the protection of personal information.

For more information on our privacy practices, visit the **<u>SAQ Privacy Zone</u>**.

To make a request for access to an SAQ document or for more information on our access to information practices, please consult the <u>Access to information</u> section of our website.