

PRIVACY POLICY

Last Updated On 18-Oct-2023

Effective Date 18-Oct-2023

GSH Group attach an importance to the protection of personal information of its clients, employees, suppliers, and visitors to its Internet site.

This document aims to inform you about how we collect, use, disclose, process and store personal information.

GSH Group is a Canadian corporation with its office in Quebec. It is subject to the Loi modernisant des dispositions législatives en matière de protection des renseignements personnels.

1. Personal Information – Definition

Personal information is any information which relates to a natural person and allows, alone or in combination with other information, that person to be identified.

2. Principles applicable to the collection, use, and communication or personal information

a) Responsibility

GSH Group is responsible for the personal information it manages, including personal information disclosed to third parties for processing and administrative purposes.

b) Determination of the purposes of collection

GSH Group determine the purposes for which it collects personal information before collecting it or at the time of collecting it. In the course of its activities, *GSH Group* collects personal information for the purpose of operating its businesses, recruiting, employees, serving its customers, establishing and maintaining business relationships, maintaining the security of its facilities, customers, employees and third parties, and complying with its legal obligations.

c) Consent

GSH Group will not collect, use or disclose personal information for purposes other than those for which it was collected, except with the consent and knowledge of the individual or as authorized or required by law.

d) Limitation of Collection

The collection of personal information by *GSH Group* is limited to what is necessary for the purposes that it has mentioned or that are clearly implicit at the time of collection. *GSH Group* always obtains personal information through legal methods. There is a possibility that *GSH Group* may collect and use a third party's information on a person, when the law so authorizes it, and with the individual's consent in all other cases.

e) Limitations to the use and disclosure

GSH Group will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the person or as required by law. *GSH Group* undertake to limit disclosure and access to personal information only to those who need it for the purposes for which they were collected. We may

share personal information with agents and partners who work to perform functions on our behalf, including data processing, order and publication fulfillment, sending postal mail and e-mail, providing customer service, and providing marketing assistance. *GSH Group* retains personal information for as long as it is reasonably needed for the purposes for which they were collected or as required by law.

f) **Accuracy**

GSH Group will make responsible efforts to ensure that personal information of individuals is as accurate and complete as is necessary for the purposes for which it is to be used.

No request for rectification may be considered unless it is made in writing, in accordance with the request for access to personal information process as hereinafter provided.

g) **Security**

GSH Group undertakes to apply, and to require that its subcontractors acting as data processors, apply physical, technological and administrative safety measures that are appropriate to maintain the confidentiality of personal information, and protect same from loss, theft, disclosure or unauthorized access. Personal information retained by *GSH Group* is stored in Canada or in United States.

h) **Transparency**

GSH Group will readily make information available to individuals about its policies and practices relating to the management of personal information upon demand.

i) **Access**

Subject to relevant legislation, on receipt of a written request from an individual in this regard, *GSH Group* informs the individual whether it holds any personal information about him or her. On receipt of such written request, *GSH Group* sends a summary of how the information is or has been used, provides a list of any third parties to which the information has been disclosed and the purpose for disclosing the information to third parties. *GSH Group* may decline to provide an individual access to his or her information, in accordance with applicable laws, in which case it shall state its reason or reasons for such decision, except when it is prohibited from doing so by law.

j) **Complaints**

A person about whom *GSH Group* has personal information may file a complaint regarding non-compliance with this policy. *GSH Group* has procedures in place to receive and respond to complaints concerning this policy and its personal information handling practices.

3. Contact and representative

If you have any questions, concerns or complaints about your personal information or *GSH Group*' privacy policy, you can contact *Mario Pelletier* by mail at *GSH Group*, 8000 rue St-Patrick, Lasalle, Qc H8N 1V1 or by e-mail at info@gsh.ca.