

Online Privacy Policy

1. Generalities

This Web site (the “Web site”) is owned and operated by eXpan Group and its entities Isofoam Group, Le Groupe Légerlite and Foam Concept 2000 (“eXpan Group”). eXpan Group recognizes the importance of protecting personal information and is concerned about how it is handled.

We are committed to collecting, using, disclosing and retaining only the personal information that is necessary to carry out our activities in the course of our business.

eXpan Group has adopted a policy on the protection of personal information, applies it in the course of its business, and has designated a person responsible for the protection of personal information and privacy within its company in accordance with the *Act Respecting the Protection of Personal Information in the Private Sector* (the “Act”). The identity and contact details of this person are listed at the end of this section.

This Privacy Policy describes the type of personal information collected, how it may be used and with whom it may be shared. eXpan Group's privacy policy also describes the measures taken to protect the security of this information and how you can access, modify or delete your personal information.

2. When and how personal information is collected

In the normal course of business and while providing services, eXpan Group collects certain personal information necessary for these purposes or for any other compatible purpose if the criteria of the Personal Information Protection and Electronic Documents Act (PIPEDA) and other applicable privacy laws and regulations are met (collectively, the “Act”). Personal information may also be collected by eXpan Group in the context of employment, customer knowledge, collection, consultation and business relations.

The personal information collected by eXpan Group may relate to the identification, contact information, health, social or family situation, employment, recruitment, financial information, training or education of the individuals concerned, depending on the nature of the relationship between the latter and eXpan Group. Identification documents containing personal information may also be collected by eXpan Group.

eXpan Group ensures that individuals from whom we collect personal information are notified of the collection and understand the purposes for which it is being collected.

eXpan Group may collect personal information using technology that includes functions to identify, locate or profile an individual. In such cases, consent in accordance with the

Act will be sought from the person concerned. Information on the use of eXpan Group's Web site and other technical information or information on the interaction with the Web site may be collected.

In cases where personal information collected by eXpan Group is provided by a third party, i.e. a person other than the person to whom the information relates, the person making the communication must ensure that he or she has obtained the consent of the person to whom the information relates and has given him or her prior notice of the communication.

Please do not provide us with any personal information of third parties during your use of the Web site without first obtaining their express consent to such disclosure.

3. Cookies and Other Website Usage Information

The eXpan Group Web site uses a technology known as “cookies”. A cookie is a tiny element of data that a Web site can send to your browser, which may then be stored on your hard drive so eXpan Group can recognize you the next time you visit. Cookies are used to help identify which parts of the Web site are useful and which parts need improvement, which helps eXpan Group plan future improvements to its Web site. You may set your browser to notify you when you receive a cookie, or to block cookies. However, if you choose not to accept cookies from the eXpan Group Web site, you may not be able to take full advantage of all the features it offers.

A technology called “web beacons” may also be used. This technology allows eXpan Group to know which pages of the Web site you visit. It is also used to optimize and adapt the Web site for you and any future visitors.

The IP (Internet Protocol) addresses of all Web site visitors are collected, along with clickstream and other related information, such as the Web sites you visited immediately before and immediately after visiting the eXpan Group Web site, Web page requests, browser type, operating system, the Internet service provider you use, and the average time spent browsing the eXpan Group Web site. This information is used to administer the Web site, monitor and improve services and the Web site, determine how the Web site is used, identify popular areas and analyze trends and usage patterns.

4. Purpose of use of personal information

Personal information collected by eXpan Group is used to provide our services and, in some cases, to meet legal obligations, particularly those arising from the Act. Personal information collected by eXpan Group may also be required to fulfill contractual obligations to our clients and other third parties.

eXpan Group may use your personal information to communicate you with information about its products, products of its partners, as well as other company news. In accordance with Section 6 below, you may unsubscribe from these communications at any time.

Personal information may also be shared internally and with affiliates to enable eXpan Group to respond appropriately to your requests, communicate with you for the purposes described herein or otherwise assist you, as described above.

eXpan Group will only retain your personal information as long as necessary to fulfill the purposes for which it was collected, and will anonymize, delete or destroy such information once those purposes have been fulfilled and the personal information is no longer required.

5. Accuracy of your personal information

In order to assist you in a professional manner, the personal information collected must be accurate, complete and up-to-date. You can access, update and correct any inaccuracies in your personal information under eXpan Group's control and custody by sending an e-mail to rprp@expan.ca.

6. Withdrawal of consent for collection, use and communication

You may withdraw your consent to the collection, use and disclosure of your personal information at any time by sending an e-mail to rprp@expan.ca. However, if you withdraw your consent, eXpan Group may not be able to continue to respond to your inquiries, process any requests made, or otherwise assist you in connection with the website. With respect to marketing communications, you may choose whether or not to receive such communications from eXpan Group and its affiliates. You may change your preferences regarding commercial communications at any time by clicking on the “unsubscribe” link at the end of each e-mail campaign sent to you by eXpan Group and its affiliates, or by sending an e-mail to rprp@expan.ca. and stating that you no longer consent to receive e-mail, direct mail and/or telephone communications.

7. When personal information may be disclosed by eXpan Group

From time to time, eXpan Group may share personal information in its possession with third parties, including service providers. These third parties may, in some cases, be located outside the province of Quebec, so the personal information that eXpan Group collects and holds may be in a jurisdiction with a different applicable legal regime than that of Quebec.

eXpan Group's contracts with third parties require them to maintain the confidentiality of personal information and provide, among other things, for their obligation to respect the

legal framework applicable to eXpan Group with respect to the protection of personal information and privacy.

Subject to an exception provided for in the Act, consent will be sought from individuals to whom personal information relates if eXpan Group were to disclose to third parties personal information that is not related to its current operations and activities or that is not compatible with the purposes for which it was collected.

It is also possible that eXpan Group may disclose certain personal information it holds during a commercial transaction or in other cases provided for by law. If the circumstances of the communication are such that eXpan Group does not need to seek the consent of the individuals to whom the personal information relates, it will comply with the requirements of the Act to proceed with such communication.

In addition, eXpan Group may be required to disclose certain personal information it holds to government authorities or law enforcement agencies.

8. Security measures taken by eXpan Group with respect to personal information held by it

eXpan Group implements policies and practices that govern the governance of eXpan Group and the protection of personal information.

Personal information held by eXpan Group is kept in secure locations, in accordance with generally accepted practices, and access to this information is limited to employees who need access to it in the course of their duties.

eXpan Group employees are made aware of the importance of protecting personal information and of the measures to be taken to ensure its confidentiality. As part of their duties, employees follow procedures that protect the confidentiality of personal information and promote best practices in this area.

eXpan Group protects personal information as soon as it is collected and implements security measures to protect it against use that does not comply with current legislation, accidental loss, unauthorized modification, disclosure or access, misuse or any form of illegal use. However, eXpan Group cannot guarantee that the personal information it collects will be protected against any attack.

8. Where eXpan Group stores personal information

eXpan Group's personal information may be held or transferred outside the province of Quebec, including countries other than Canada whose privacy laws differ from those of Quebec and Canada. When information is located outside Quebec or Canada, it is subject

to the laws of the country where it is located, and its collection, communication, use and destruction may be carried out differently from provincial or federal requirements.

9. Retention Period for Personal Information

Unless authorized or required by applicable laws, eXpan Group retains personal information only for the time necessary to achieve the purposes for which it was collected, including to meet ethical, legal, tax, accounting, or appropriate government notification requirements. At the end of the retention period, personal information is destroyed, deleted, or anonymized. Anonymized information no longer allows, and irreversibly prevents, the identification of the individual concerned.

In the event of a confidentiality incident involving personal information, eXpan Group follows the provisions of the applicable law and takes reasonable measures to mitigate the risks of harm to the individuals concerned by the personal information involved in the incident.

10. Links to Third-Party Sites

In the event that the website contains links to other websites that eXpan Group does not own or operate, none of your personal information will be shared with these third parties without your consent. Linked websites may have separate and independent privacy statements, notices, and terms of use that are recommended to be read carefully. eXpan Group has no control over these websites and, therefore, assumes no responsibility or liability for how the organizations operating these websites may collect, use, disclose, protect, or otherwise handle your personal information.

11. Updates to Our Privacy Policy

eXpan Group may revise this privacy policy from time to time. If eXpan Group decides to modify its privacy policy, the updated version will be available on our websites. To ensure you are informed of the latest privacy terms, it is recommended to regularly check the page where the privacy policy is posted.

12. Complaint related to our policy

Anyone who believes that their own personal information or that of another person has been subject to:

- *Unauthorized access by law;*
- *Unauthorized use by law;*
- *Unauthorized disclosure by law;*
- *Loss or any other breach of the protections provided by law*

is invited to submit their complaint in writing to the Privacy Officer identified below.

The complaint must include relevant details, such as the personal information involved, the context, the potential or actual harm suffered or that could be suffered, as well as the relevant dates. The details of the reported incident should be described as precisely as possible to enable a prompt response.

Any employee who receives a complaint knows to forward it immediately to the Privacy Officer.

Upon receipt of a complaint, eXpan Group follows its internal complaint handling procedure to address the complaint fairly

13. Privacy officer

For any questions or comments regarding how eXpan Group handles personal information throughout its lifecycle within eXpan Group, or if you wish to exercise your rights under the law concerning personal information protection, you can contact the Privacy Officer at eXpan Group:

Jérôme Caron
eXpan Group inc.
1338, boul. Vachon N
Sainte-Marie (Québec) G6E 1N4
rprp@expan.ca

You can contact us by phone at (418) 387-3641. You can unsubscribe from eXpan Group's email lists at any time by sending an email to rprp@expan.ca.