



PERSONAL INFORMATION PROTECTION POLICY

Le Groupe Maurice, including all its residences and affiliated companies, undertakes to respect the privacy of its residents, employees, external volunteers and all persons with whom it does business.

Le Groupe Maurice undertakes to collect, use and protect personal information in accordance with this Personal Information Protection Policy (the “Policy”) and in compliance with the *Act respecting the protection of personal information in the private sector* and related laws or regulations.

Important principles governing personal information management

The following three principles guide Le Groupe Maurice’s personal information management practices:

- **Consent:** Le Groupe Maurice collects personal information with the consent of the persons concerned or their agents, or if required to do so by law or court order.
- **Transparency:** Le Groupe Maurice makes sure to act with transparency in its personal information protection practices.
- **Protection:** Le Groupe Maurice makes sure to maintain best practices in the areas of information management and protection in order to store personal information securely and to oversee its use.

1. COLLECTION AND USE OF PERSONAL INFORMATION

1.1. Consent

In general, Le Groupe Maurice will request consent for the collection, use or disclosure of personal information at the time it is collected.

Under certain circumstances, personal information may be collected, used or communicated without obtaining the consent of the persons concerned or their agents, particularly if required to do so by law or court order, or if obtaining consent is difficult or impossible for some reason, or in case of emergency or if a person’s life, health or safety is threatened.

1.2. Framework for personal information collection

Le Groupe Maurice collects and uses personal information in the following situations:

| Applicability | Information collection framework |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| General | In connection with Le Groupe Maurice’s activities, particularly involving external suppliers or to comply with laws, court decisions or other legal requirements. |
| Applicable to residents | (1) In connection with the provision of services within residences: <ul style="list-style-type: none">a) Recreationb) Health care and assistancec) Food |

| | |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| | d) Security e) Administration (2) In connection with apartment/studio rentals (3) In connection with condominium purchases/sales |
| Applicable to employees | (1) In connection with the hiring process (2) In connection with work performance |
| Applicable to external volunteers | In connection with the candidate selection process |

1.3. Types of personal information collected

Le Groupe Maurice limits itself to collecting required personal information only. Here are some examples of personal information that may be collected:

| Category | Examples |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identification information | Name, birthdate, mailing address, email, telephone number, photo, marital status, government ID (passport number, driver's licence number, etc.), social insurance number, citizenship, birth country, gender identity, sexual orientation, visible minority, number of children |
| Financial information | Bank account number, credit history/rating, insurance policy, group insurance beneficiary, income |
| Health information | Medical file, disability status, vaccination, medications taken, health insurance number, contact information for pharmacist/physician/social worker |
| Employment information | Employment status, criminal record, employment contract, work permit |
| Information on next of kin | Name, age, birthdate, mailing address, email, telephone number, mandate/proof of representation |
| Education/training information | Schooling, diplomas, proof of training, proof of registration with a professional association |
| Marketing information | Communication preferences, food preferences, activity preferences, areas of interest, website use |

1.4. Information collection objectives

Le Groupe Maurice collects and uses personal information primarily to achieve the following objectives:

| Category | Objective |
|---------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Getting to know residents, employees, volunteers and other persons with whom Le Groupe Maurice does business | Verify identity Update contact information Ensure personal safety/security Verify the accuracy of personal information disclosed |
| Developing and maintaining trust-based relationships with these persons | Adapt our communication methods Understand and meet expectations Assess needs Enhance our services Document and efficiently manage incidents/accidents Process requests and complaints Determine the cost of services |

| | |
|---------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Acting responsibly and diligently | Fulfil our contractual obligations Comply with laws and court decisions Train our employees appropriately Ensure that sound business practices are maintained Enforce our organizational policies and processes |
| Improving our products and services, and offering a distinctive client/employee experience | Understand how and by whom our digital tools and our website are used in order to improve them Learn more about on the experiences of our residents, their loved ones and our employees Facilitate and increase our interactions with prospective clients, residents, their loved ones and our employees Improve the experience in our residences or in connection with employment Facilitate data entry and processing for analytical and statistical purposes |

2. PROTECTION OF PERSONAL INFORMATION

To ensure the protection of personal information, Le Groupe Maurice applies security measures that adhere to best practices in the field, as well as to appropriate standards for the type of personal information being protected. Technological and organizational measures are used to ensure the protection of the personal information collected.

For example, access to our various IT systems and physical files is granted to each user based on the type of information stored in them and on their level of sensitivity, taking into account the user's need to access this information in the performance of his/her duties. The level of sensitivity of personal information is taken into consideration when the required level of protection is established.

Users are trained on internal policies and procedures aimed at protecting the confidentiality of personal information.

3. COMMUNICATION OF PERSONAL INFORMATION

To the greatest possible extent, Le Groupe Maurice limits access to the personal information collected and ensures that only those persons who need access to certain types of personal information in the performance of their duties can access it. Nevertheless, to achieve the objectives mentioned in this Policy, Le Groupe Maurice must sometimes communicate certain types of personal information to other persons or organizations.

For example, Le Groupe Maurice may be required to communicate personal information to the following third parties:

- Le Groupe Maurice's various affiliated companies.
- External suppliers for the provision of services.
- Public organizations, such as the CISSS, CIUSSS, MSSS, CLSC, as well as fire, police or ambulance departments.
- Quebec's *Ministère du Revenu* for the processing of tax credits for residents.
- Courts or other competent authorities.
- Complaints and Service Quality Commissioners or the *Protecteur du citoyen* (ombudsperson).
- Public Guardian/Trustee.

- Medical personnel external to Le Groupe Maurice, such as doctors and pharmacists.
- Designated emergency contact persons.

3.1. Sensitive personal information

Le Groupe Maurice has put in place specific security measures and mechanisms to ensure that no sensitive personal information is disclosed to unauthorized persons unless Le Groupe Maurice is required to act in accordance with applicable law.

3.2. External service providers

Le Groupe Maurice uses external service providers in connection with its operations. These providers may have access to various types of personal information. Le Groupe Maurice carefully selects its providers and ensures that they protect all personal information communicated to them.

3.3. Outside Canada

Le Groupe Maurice stores the personal information it collects primarily in Canada, although this information sometimes has to be transferred outside Canada, e.g. if a service provider is based in another country. In that case, prior to transferring any personal information outside Canada, Le Groupe Maurice ensures that it will be properly used and protected.

4. STORAGE AND DESTRUCTION OF PERSONAL INFORMATION

Le Groupe Maurice stores personal information in accordance with legal and regulatory requirements.

Le Groupe Maurice undertakes to destroy or de-identify this information diligently, based on the applicable circumstances and rules. Destruction or de-identification is carried out securely, in accordance with applicable best practices.

Once this information has been de-identified, the persons concerned can no longer be identified and the information is no longer deemed personal. Among other things, Le Groupe Maurice uses this information for analytical or statistical purposes, or to establish performance indicators.

5. REQUESTS TO ACCESS OR RECTIFY PERSONAL INFORMATION

To submit an information or rectification request, to share a comment or to file a complaint in line with this Policy or with respect to personal information, please contact the Information Protection and Privacy Officer by email (rprp@legroupe maurice.com) or by regular mail to the following address:

Le Groupe Maurice
FAO: Information Protection and Privacy Officer
2400-137 Rue des Nations
Montreal, Quebec H4R 3G4

The Information Protection and Privacy Officer will respond to your request as soon as possible.

6. POLICY UPDATES

This Personal Information Protection Policy may be modified without notice. Updated versions of this Policy will be available at all times on Le Groupe Maurice's website.