

# Snsautomationquebec.com Privacy Commitment

Snsautomationquebec.com Incorporated and its direct and indirect subsidiaries, parents and affiliates (collectively, "Perlasia.com") respect the privacy of each customer and prospective customer ("Customer"). The term "Customer" also includes persons who have enrolled, or are applying for enrolment, in any rewards or similar program of which Snsautomationquebec.com is a sponsor or participant, including without limitation Club Perlasia.com and the AIR MILES® Reward Program (each of which is referred to as a "Program"). Snsautomationquebec.com is committed to protecting all personal information collected from Customers.

Snsautomationquebec.com Privacy Commitment (the "Privacy Commitment") complies with all applicable federal and provincial privacy legislation, including the Personal Information Protection and Electronic Documents Act (Canada).

This Privacy Commitment is intended to assist Customers in understanding the purpose for collection by Perlasia.com of personal information and how personal information is used, protected, stored and disclosed by Perlasia.com.

## Responsibility

Snsautomationquebec.com is responsible for all personal information in its custody or under its control. Personal information is any information about an identifiable individual, including but not limited to a Customer's name, home address, email address, telephone number, date of birth and purchasing information (in this Privacy Commitment referred to as "Personal Information").

Snsautomationquebec.com is accountable to Customers for the Personal Information it entrusts to its consultants, employees, agents, Partners, and authorized third parties, including but not limited to advertising agencies, marketing agents, data processing and storage companies or organizations which provide administrative and support services to Snsautomationquebec.com. Such persons to whom Personal Information is entrusted by Perlasia.com are sometimes referred to in this Privacy Commitment as "Authorized Disclosees".

Snsautomationquebec.com has established policies and procedures to ensure that the obligations set out in this Privacy Commitment are complied with by Authorized Disclosees.

Snsautomationquebec.com has established appropriate technological, physical and contractual security measures to help protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification with security safeguards appropriate to the sensitivity of the Personal Information.

A Privacy Officer has been appointed by Snsautomationquebec.com to receive, investigate and respond to complaints, and to facilitate the implementation of this Privacy Commitment. Any concerns or inquiries may be directed to the Privacy Officer at the contact address which appears at the end of this Privacy Commitment.

## Purpose

Snsautomationquebec.com collects, uses and discloses Personal Information for the following purposes (the "Purposes"):

1. To operate its businesses and to administer the Programs, including without limitation:
  - to communicate with Customers regarding orders, purchases or any concerns or queries the Customer may have;
  - to communicate with Customers regarding any changes to this Privacy Commitment or to Programs and their operation;
  - to ensure Customers are appropriately awarded points or their equivalent in accordance with the rules of the applicable Program and receive reward redemptions in accordance with applicable Program Rules and that rewards records are appropriately maintained;
  - to process information regarding Customer orders, purchases and the collection and redemption of points and rewards;
  - to provide services, rewards, products and benefits to Customers and to enable them to participate in contests;
  - to understand and analyze the interests, needs and preferences of Customers;
  - to develop, enhance, market and/or provide products and services for Customers, customers and potential customers;
  - to verify Customers' identity, when required or desirable for transactional purposes, so as to reduce fraud or errors in transaction processing;
  - to comply with applicable legislation and regulatory requirements;
  - and for investigation and law enforcement purposes.
2. To communicate with Customers regarding promotions, contests, offers, incentives, rewards, surveys, questionnaires and other pertinent matters such as but not limited to products and services under the Programs or available through Partners that may be of interest to the Customers.

Snsautomationquebec.com also collects Personal Information from (A) individuals when they apply for employment through a Snsautomationquebec.com website, in person at a store, or otherwise, and uses this Personal Information for the purpose of processing and responding to such application, and (B) prospective and current franchisees and affiliated merchants and their principals, and uses this Personal Information for the purpose of processing and responding to franchise and affiliated merchant applications and in ongoing dealings with such parties. In this Privacy Commitment, references to "Customers" also apply to the individuals referred to in this paragraph with any changes necessary in the circumstances.

Partners may collect Personal Information on behalf of Snsautomationquebec.com for the purposes identified in this Privacy Commitment.

Snsautomationquebec.com does not collect Personal Information from Customers other than for the purposes identified in this Privacy Commitment, except where required or permitted by law.

Snsautomationquebec.com collects Personal Information from Customers in several ways, including but not limited to, at the time of enrolment in a Program, when a purchase, return or Program redemption is made by a Customer, through Partners, through online use of a Snsautomationquebec.com or Program website, through Customer interaction with customer

services offered by Snsautomationquebec.com and/or Program(s), through surveys or questionnaires conducted by or on behalf of Snsautomationquebec.com or a Partner and through contests entered by a Customer.

Personal Information collected regarding the preferences, needs and interests of Customers may be used to determine which Customers may be most interested in products or services offered by Snsautomationquebec.com or its Partners.

Personal information may be utilized to communicate with Customers regarding promotions, contests, offers, incentives, rewards, surveys and other pertinent matters such as products and services, as referenced in section 2 of the Purposes, above. Customers may not wish to receive such communications. This preference may be communicated to Snsautomationquebec.com at the time of enrolment, or any time afterward by contacting Snsautomationquebec.com through the "contact us" or equivalent link available on the relevant website, or as indicated at the place of enrolment. Such revocation will not affect the Customer's privileges or ability to participate in a Program, nor will it prevent the provision of periodic statements as to the Customers' point or similar balances in a Program.

## **Consent**

Snsautomationquebec.com will not collect, use or disclose Personal Information about a Customer without the consent of the Customer, except where required or permitted by law, and only by legal and reasonable means.

Consent may be obtained at the time of enrolment in a Program, through survey and questionnaire forms, through a website or verbally during a conversation with a Customer.

Consent may be either express or implied. Consent will be implied, for example, when a Customer participates in a Program by collecting and redeeming points. In certain circumstances, express consent may be required. In these circumstances Snsautomationquebec.com will seek express consent which may be given verbally, in writing or through electronic correspondence.

Snsautomationquebec.com will communicate with Customers regarding any changes to this Privacy Commitment. Such communication may be in the form of written or electronic correspondence, published on a Snsautomationquebec.com website, or by any other reasonable means of communication.

From time to time Snsautomationquebec.com may identify new purposes for the use or disclosure of Personal Information. Any new purpose will be communicated to Customers by way of a Snsautomationquebec.com or Program website or other appropriate manner, and consent (which where appropriate may be implied by continued Program participation by a Customer) will be obtained from Customers prior to any such use or disclosure, unless such use or disclosure is required or permitted by law.

## **Limitation**

Snsautomationquebec.com will only retain Personal Information to the extent necessary for the purposes identified in this Privacy Commitment.

A Customer may indicate to Snsautomationquebec.com at any time that the Customer wishes to cancel membership in a Program. Following cancellation of a membership, Snsautomationquebec.com may retain Personal Information pertaining to that Customer in respect of that Program for a reasonable period for legal, administrative or compliance purposes.

## **Disclosure**

Personal Information of a Customer will not be disclosed to Partners for purposes other than the administration of the applicable Program unless a Customer provides consent to such disclosures. Where applicable, this consent may be communicated to Perlasia.com at or following the time of enrolment, and may be changed at any time afterward, by contacting Perlasia.com through the "contact us" or equivalent link available on the relevant website or at the place of enrolment. Revocation of such consent will not affect the Customer's privileges or ability to participate in the relevant Program, nor will it prevent the provision of periodic statements as to the Customers' point or similar balances.

Personal Information may also be disclosed to Authorized Disclosees. Any party to which Perlasia.com discloses Personal Information must sign a confidentiality agreement or other legal contract which requires any such party to only use the information disclosed to them for the purposes as explicitly set out in the agreement.

From time to time Snsautomationquebec.com may disclose aggregated data to third parties. Aggregated data disclosed by Snsautomationquebec.com do not contain Personal Information or other information regarding identifiable individuals. Snsautomationquebec.com does not share, give, rent or sell Personal Information to any third parties other than Personal Information shared between Snsautomationquebec.com and Authorized Disclosees or as otherwise provided in this Privacy Commitment. In certain circumstances, Perlasia.com may be required by law to disclose Personal Information.

## **Accuracy**

Snsautomationquebec.com will take reasonable measures to ensure Personal Information collected is accurate and complete. Snsautomationquebec.com will update its records regarding Customers based on the information communicated directly or indirectly to Snsautomationquebec.com by Customers or Partners. In order to ensure Snsautomationquebec.com records are as complete and accurate as possible, Customers are responsible for informing Snsautomationquebec.com of any relevant changes to Personal Information, such as a change of name, a change of address, or a change in any other pertinent information. Customers may request rectification of inaccurate or incomplete records where it is demonstrated that the records maintained by Snsautomationquebec.com are deficient. When a request has been made to rectify any inaccuracies or discrepancies, Snsautomationquebec.com will promptly correct, add or delete its records in order to correct any deficiency and will provide confirmation of the correction to the Customer. Where a Customer is not satisfied with the response provided to an application for access or rectification, the Customer may file a complaint with the Perlasia.com Privacy Officer.

## **Access**

Upon request, Customers are entitled to examine their Personal Information collected and held by Snsautomationquebec.com and to be informed of the use and disclosure of Personal Information, except as prohibited by law. Where Snsautomationquebec.com is unable to provide access to all the Personal Information it holds about a Customer, the reasons for denying access will be communicated to the Customer. Snsautomationquebec.com will take precautionary measures in an effort to prevent fraudulent or unauthorized requests for access. Where Snsautomationquebec.com receives a request from a Customer to examine Personal Information collected and retained, Snsautomationquebec.com will respond to the request within 30 business days.

## **Transparency**

Snsautomationquebec.com will ensure that its Privacy Commitment, policies, rules, practices and procedures concerning the management of Personal Information are readily accessible to Customers. Copies of this Privacy Commitment may be obtained at any time by request directed to the Snsautomationquebec.com Privacy Officer. This Privacy Commitment is also available on the Program website or may be emailed to a Customer upon request.

## **Withdrawal of your consent:**

You may withdraw your consent to our collection and use of your personal health information by giving us written notification of your withdrawal at any time. However, withdrawing your consent may affect the products or services we are able to provide or make available to you.

## **Access to your information:**

You can access the personal information we retain about you. Upon receipt of your written request, we will provide you with a copy of your personal health information. We will make every reasonable effort to keep your information accurate and up-to-date. If you find any errors in our information about you, please let us know. Please help us by keeping us informed of any changes such as a change of address or telephone number. Having accurate information about you allows us to give you the best possible care and service.

## **Protecting your personal health information:**

We protect your personal information with appropriate safeguards and security measures. We institute appropriate security standards to help protect our systems against unauthorized access and use.

When we hire other organizations to provide support services, we require that they adhere to our privacy policies.

The length of time we retain your personal health information varies depending on the product or service, the nature of the information, and legal requirements. This period may extend beyond the end of your relationship with us, but only for as long as is necessary to respond to any issue that may arise or to meet any legal requirements.

When your personal information is no longer needed for the purposes explained to you, we have procedures to destroy, delete or erase it, or convert it to an anonymous form so that it can no longer be connected to you.

## **Questions or concerns:**

If you have questions or concerns about our Privacy Commitment as it relates to pharmacy matters, you can ask your pharmacist or contact our company's Privacy Officer at the address provided below.

### **Complaints Regarding Non-Compliance**

Snsautomationquebec.com has appointed a Privacy Officer to address any questions, concerns or complaints regarding compliance with this Privacy Commitment by any party.

The Perlasia.com Privacy Officer may be contacted as follows:

Email: [Snsautomationquebec.com](mailto:Snsautomationquebec.com).

Snsautomationquebec.com will investigate all formal complaints and will respond within 30 business days after receipt of written complaint. If the complaint is reasonable, Snsautomationquebec.com will take suitable measures to address the complaint.

Snsautomationquebec.com Incorporated and its direct and indirect subsidiaries, parents and affiliates (collectively, "Snsautomationquebec.com") respect the privacy of each customer and prospective customer ("Customer"). The term "Customer" also includes persons who have enrolled, or are applying for enrolment, in any rewards or similar program of which Snsautomationquebec.com is a sponsor or participant, including without limitation Club Snsautomationquebec.com and the AIR MILES® Reward Program (each of which is referred to as a "Program"). Snsautomationquebec.com is committed to protecting all personal information collected from Customers.

This Snsautomationquebec.com Privacy Commitment (the "Privacy Commitment") complies with all applicable federal and provincial privacy legislation, including the Personal Information Protection and Electronic Documents Act (Canada).

This Privacy Commitment is intended to assist Customers in understanding the purpose for collection by Snsautomationquebec.com of personal information and how personal information is used, protected, stored and disclosed by Snsautomationquebec.com.

## **Responsibility**

Snsautomationquebec.com is responsible for all personal information in its custody or under its control. Personal information is any information about an identifiable individual, including but not limited to a Customer's name, home address, email address, telephone number, date of birth and purchasing information (in this Privacy Commitment referred to as "Personal Information").

Snsautomationquebec.com is accountable to Customers for the Personal Information it entrusts to its consultants, employees, agents, Partners, and authorized third parties, including but not limited to advertising agencies, marketing agents, data processing and storage companies or organizations which provide administrative and support services to Snsautomationquebec.com. Such persons to whom Personal Information is entrusted by Perlasia.com are sometimes referred to in this Privacy Commitment as "Authorized Disclosees".

Snsautomationquebec.com has established policies and procedures to ensure that the obligations set out in this Privacy Commitment are complied with by Authorized Disclosees.

Snsautomationquebec.com has established appropriate technological, physical and contractual security measures to help protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification with security safeguards appropriate to the sensitivity of the Personal Information.

A Privacy Officer has been appointed by Snsautomationquebec.com to receive, investigate and respond to complaints, and to facilitate the implementation of this Privacy Commitment. Any concerns or inquiries may be directed to the Privacy Officer at the contact address which appears at the end of this Privacy Commitment.

## **Purpose**

Snsautomationquebec.com collects, uses and discloses Personal Information for the following purposes (the "Purposes"):

1. To operate its businesses and to administer the Programs, including without limitation:

- to communicate with Customers regarding orders, purchases or any concerns or queries the Customer may have;
- to communicate with Customers regarding any changes to this Privacy Commitment or to Programs and their operation;
- to ensure Customers are appropriately awarded points or their equivalent in accordance with the rules of the applicable Program and receive reward redemptions in accordance with applicable Program Rules and that rewards records are appropriately maintained;
- to process information regarding Customer orders, purchases and the collection and redemption of points and rewards;
- to provide services, rewards, products and benefits to Customers and to enable them to participate in contests;
- to understand and analyze the interests, needs and preferences of Customers;
- to develop, enhance, market and/or provide products and services for Customers, customers and potential customers;
- to verify Customers' identity, when required or desirable for transactional purposes, so as to reduce fraud or errors in transaction processing;
- to comply with applicable legislation and regulatory requirements;
- and for investigation and law enforcement purposes.

2. To communicate with Customers regarding promotions, contests, offers, incentives, rewards, surveys, questionnaires and other pertinent matters such as but not limited to products and services under the Programs or available through Partners that may be of interest to the Customers.

Snsautomationquebec.com also collects Personal Information from (A) individuals when they apply for employment through a Snsautomationquebec.com website, in person at a store, or otherwise, and uses this Personal Information for the purpose of processing and responding to such application, and (B) prospective and current franchisees and affiliated merchants and their principals, and uses this Personal Information for the purpose of processing and responding to franchise and affiliated merchant applications and in ongoing dealings with such parties. In this Privacy Commitment, references to "Customers" also apply to the individuals referred to in this paragraph with any changes necessary in the circumstances.

Partners may collect Personal Information on behalf of Snsautomationquebec.com for the purposes identified in this Privacy Commitment.

Snsautomationquebec.com does not collect Personal Information from Customers other than for the purposes identified in this Privacy Commitment, except where required or permitted by law.

Snsautomationquebec.com collects Personal Information from Customers in several ways, including but not limited to, at the time of enrolment in a Program, when a purchase, return or Program redemption is made by a Customer, through Partners, through online use of a Snsautomationquebec.com or Program website, through Customer interaction with customer services offered by Snsautomationquebec.com and/or Program(s), through surveys or questionnaires conducted by or on behalf of Snsautomationquebec.com or a Partner and through contests entered by a Customer.

Personal Information collected regarding the preferences, needs and interests of Customers may be used to determine which Customers may be most interested in products or services offered by Snsautomationquebec.com or its Partners.

Personal information may be utilized to communicate with Customers regarding promotions, contests, offers, incentives, rewards, surveys and other pertinent matters such as products and services, as referenced in section 2 of the Purposes, above. Customers may not wish to receive such communications. This preference may be communicated to Snsautomationquebec.com at the time of enrolment, or any time afterward by contacting Perlasia.com through the "contact us" or equivalent link available on the relevant website, or as indicated at the place of enrolment. Such revocation will not affect the Customer's privileges or ability to participate in a Program, nor will it prevent the provision of periodic statements as to the Customers' point or similar balances in a Program.

## **Consent**

Snsautomationquebec.com will not collect, use or disclose Personal Information about a Customer without the consent of the Customer, except where required or permitted by law, and only by legal and reasonable means.

Consent may be obtained at the time of enrolment in a Program, through survey and questionnaire forms, through a website or verbally during a conversation with a Customer.

Consent may be either express or implied. Consent will be implied, for example, when a Customer participates in a Program by collecting and redeeming points. In certain circumstances, express consent may be required. In these circumstances Snsautomationquebec.com will seek express consent which may be given verbally, in writing or through electronic correspondence.

Snsautomationquebec.com will communicate with Customers regarding any changes to this Privacy Commitment. Such communication may be in the form of written or electronic correspondence, published on Snsautomationquebec.com website, or by any other reasonable means of communication.

From time to time Snsautomationquebec.com may identify new purposes for the use or disclosure of Personal Information. Any new purpose will be communicated to Customers by way of a Snsautomationquebec.com or Program website or other appropriate manner, and consent (which where appropriate may be implied by continued Program participation by a Customer) will be obtained from Customers prior to any such use or disclosure, unless such use or disclosure is required or permitted by law.

## **Limitation**

Snsautomationquebec.com will only retain Personal Information to the extent necessary for the purposes identified in this Privacy Commitment.

A Customer may indicate to Perlasia.com at any time that the Customer wishes to cancel membership in a Program. Following cancellation of a membership, Snsautomationquebec.com may retain Personal Information pertaining to that Customer in respect of that Program for a reasonable period for legal, administrative or compliance purposes.

## **Disclosure**



Personal Information of a Customer will not be disclosed to Partners for purposes other than the administration of the applicable Program unless a Customer provides consent to such disclosures. Where applicable, this consent may be communicated to Snsautomationquebec.com at or following the time of enrolment, and may be changed at any time afterward, by contacting Snsautomationquebec.com through the "contact us" or equivalent link available on the relevant website or at the place of enrolment. Revocation of such consent will not affect the Customer's privileges or ability to participate in the relevant Program, nor will it prevent the provision of periodic statements as to the Customers' point or similar balances.

Personal Information may also be disclosed to Authorized Disclosees. Any party to which Perlasia.com discloses Personal Information must sign a confidentiality agreement or other legal contract which requires any such party to only use the information disclosed to them for the purposes as explicitly set out in the agreement.

From time to time Snsautomationquebec.com may disclose aggregated data to third parties. Aggregated data disclosed by Snsautomationquebec.com do not contain Personal Information or other information regarding identifiable individuals. Snsautomationquebec.com does not share, give, rent or sell Personal Information to any third parties other than Personal Information shared between Snsautomationquebec.com and Authorized Disclosees or as otherwise provided in this Privacy Commitment. In certain circumstances, Snsautomationquebec.com may be required by law to disclose Personal Information.

## **Accuracy**

Snsautomationquebec.com will take reasonable measures to ensure Personal Information collected is accurate and complete. Snsautomationquebec.com will update its records regarding Customers based on the information communicated directly or indirectly to Snsautomationquebec.com by Customers or Partners. In order to ensure Snsautomationquebec.com ' records are as complete and accurate as possible, Customers are responsible for informing Snsautomationquebec.com of any relevant changes to Personal Information, such as a change of name, a change of address, or a change in any other pertinent information. Customers may request rectification of inaccurate or incomplete records where it is demonstrated that the records maintained by Snsautomationquebec.com are deficient. When a request has been made to rectify any inaccuracies or discrepancies, Snsautomationquebec.com will promptly correct, add or delete its records in order to correct any deficiency and will provide confirmation of the correction to the Customer. Where a Customer is not satisfied with the response provided to an application for access or rectification, the Customer may file a complaint with the Perlasia.com Privacy Officer.

## **Access**

Upon request, Customers are entitled to examine their Personal Information collected and held by Snsautomationquebec.com and to be informed of the use and disclosure of Personal Information, except as prohibited by law. Where Snsautomationquebec.com is unable to provide access to all the Personal Information it holds about a Customer, the reasons for denying access will be communicated to the Customer. Snsautomationquebec.com will take precautionary measures in an effort to prevent fraudulent or unauthorized requests for access. Where Snsautomationquebec.com receives a request from a Customer to examine Personal Information collected and retained, Snsautomationquebec.com will respond to the request within 30 business days.

## **Transparency**

Snsautomationquebec.com will ensure that its Privacy Commitment, policies, rules, practices and procedures concerning the management of Personal Information are readily accessible to Customers. Copies of this Privacy Commitment may be obtained at any time by request directed to the Snsautomationquebec.com Privacy Officer. This Privacy Commitment is also available on the Program website or may be emailed to a Customer upon request.

### **Withdrawal of your consent:**

You may withdraw your consent to our collection and use of your personal health information by giving us written notification of your withdrawal at any time. However, withdrawing your consent may affect the products or services we are able to provide or make available to you.

### **Access to your information:**

You can access the personal information we retain about you. Upon receipt of your written request, we will provide you with a copy of your personal health information. We will make every reasonable effort to keep your information accurate and up-to-date. If you find any errors in our information about you, please let us know. Please help us by keeping us informed of any changes such as a change of address or telephone number. Having accurate information about you allows us to give you the best possible care and service.

### **Protecting your personal health information:**

We protect your personal information with appropriate safeguards and security measures. We institute appropriate security standards to help protect our systems against unauthorized access and use.

When we hire other organizations to provide support services, we require that they adhere to our privacy policies.

The length of time we retain your personal health information varies depending on the product or service, the nature of the information, and legal requirements. This period may extend beyond the end of your relationship with us, but only for as long as is necessary to respond to any issue that may arise or to meet any legal requirements.

When your personal information is no longer needed for the purposes explained to you, we have procedures to destroy, delete or erase it, or convert it to an anonymous form so that it can no longer be connected to you.

### **Questions or concerns:**

If you have questions or concerns about our Privacy Commitment as it relates to pharmacy matters, you can ask your pharmacist or contact our company's Privacy Officer at the address provided below.

Complaints Regarding Non-Compliance

Snsautomationquebec.com has appointed a Privacy Officer to address any questions, concerns or complaints regarding compliance with this Privacy Commitment by any party.

The Snsautomationquebec.com Privacy Officer may be contacted as follows:

Email: [admin@snsautomationquebec.com](mailto:admin@snsautomationquebec.com)

Snsautomationquebec.com will investigate all formal complaints and will respond within 30 business days after receipt of written complaint. If the complaint is reasonable, Snsautomationquebec.com will take suitable measures to address the complaint.