



**SUPERIOR PLUS CORP.**  
**PRIVACY POLICY**

<b>First Approved by Board:</b> February 16, 2012	<b>Policy Review Cycle:</b> Annually
<b>Current Version Approved by Board:</b> August 13, 2024	<b>Responsible Executive:</b> Senior Vice President and Chief Legal Officer
<b>Supersedes Version Approved:</b> August 3, 2023	

## **I. Purpose and Scope**

Superior is committed to maintaining the confidentiality, security and accuracy of the Personal Information that is in its possession as a result of normal business operations.

Superior collects, uses and discloses Personal Information about its customers, suppliers, and others with whom it has contact in the course of conducting its normal business operations. This Policy describes and governs the collection, use and disclosure of Personal Information by Superior. This Policy does not apply to anonymous or Business Contact Information.

This Policy applies to Superior, and to each individual as a Representative or prospective Representative, as a condition of their employment with Superior, as well as any other individuals, including third parties, that may have access to Personal Information in Superior's possession. When an individual contacts Superior, seeks Superior's products or services, or otherwise provides Superior with their Personal Information, the individual consents to Superior's collection, use and disclosure of their Personal Information as described in this Policy.

**This Policy includes the following topics:**

[Collection and Use of Personal Information](#)

[Sharing and Disclosure of Personal Information](#)

[Protection and Retention of Personal Information](#)

[Accessing and Updating Personal Information](#)

[Consent](#)

[Cookies and Web Analytics](#)

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### *Definitions*

In this Policy the following capitalized terms have the meanings set out below:

“Business Contact Information” means information that is used for the purpose of communicating or facilitating communication with an individual in relation to their employment, business or profession such as the individual’s name, position name or title, work address, work telephone number, work fax number or work electronic address.

“Personal Information” means information about an identifiable individual, excluding Business Contact Information.

“Policy” means this privacy policy, as may be amended from time to time.

“Representative” means a director, officer, employee or independent contractor of Superior. For certainty, independent contractor includes an individual acting as a consultant or performing other services for Superior who is not a director, officer or employee.

“Superior” means Superior Plus Corp., Superior Plus LP, Superior General Partner Inc., and each of their divisions, partnerships, affiliates and subsidiaries, including any and all internal governance bodies.

## **II. Collection and Use of Personal Information**

### *Types of Personal Information Collected*

Superior collects and uses different types of Personal Information about individuals who Superior interacts with. This includes customers, suppliers, investors, and website visitors. The most common types of Personal Information collected and used by Superior are:

- a) identification and contact information: including, but not limited to, name, address, telephone number, and email address;
- b) financial information: including, but not limited to, credit information, billing records, accounts receivable and payment information and tax related information;
- c) business relationship and operations information: including, but not limited to, customer and supplier service requests, customer addresses and personal contacts, service and equipment records, any recorded customer complaints, investor contact information and requests, agreement terms and preferences, property holder information necessary for administration of our leases and operations, and information necessary to effect emergency response plans; and
- d) technical information: including, but not limited to, device, browser, page visits, preferences and other information that is automatically collected by cookies, third party analytics tools including Google Analytics, and similar technologies when individuals visit Superior websites.



### *Why Superior Collects and Uses Personal Information*

Superior collects and uses these types of Personal Information in order to manage and develop its business and operations, including:

- a) establishing, managing and terminating business relations with customers and suppliers;
- b) informing investors of, and supplying investors with, investor relations information;
- c) protecting against error, fraud, theft damage or nuisance relating to Superior's assets, operations or reputation and securing company-held information;
- d) undertaking our environmental, health and safety activities, including incident planning, emergency response and investigation;
- e) maintaining and improving Superior websites and website visitor experience;
- f) complying with individual requests;
- g) complying with applicable law or regulatory requirements;
- h) protecting the rights, property and safety of Superior or its stakeholders; and
- i) any other reasonable purpose required by Superior and to which an individual consents.

Superior typically collects Personal Information of an individual directly from that individual. However, Superior may sometimes collect Personal Information indirectly with the individual's consent or if permitted or required to by law.

### **III. Sharing and Disclosure of Personal Information**

Superior will not disclose your Personal Information to third parties without consent or legal authority to do so. Superior may share or disclose Personal Information in the following circumstances:

- a) with service providers and business partners that assist Superior in the operation and development of its business for purposes described in this Policy;
- b) where the information is publicly available;
- c) to protect the rights property, or safety of Superior or its stakeholders;
- d) when emergencies occur or where it is necessary to protect the safety of a person or group of persons;
- e) where it is relevant to a business transaction, such as a sale of part or all of Superior, a corporate re-organization, or a partnership or investment opportunity;
- f) to investigate, remedy or enforce the potential breach of an agreement or law, or to comply with any valid legal requirement, legal process or governmental request; or
- g) Superior has otherwise obtained an individual's consent.

### *Service Providers and Business Partners*



Superior shares Personal Information with organizations that assist Superior in operating and developing its business, including service providers and other business partners. Service providers are organizations that process Personal Information on Superior's behalf. Superior's business partners include, but are not limited to, related companies and contractors, as well as affiliates that refer customers to Superior or provide similar business development opportunities.

When Superior shares Personal Information with service providers, Superior requires them to commit to protecting Personal Information in line with Superior's standards, and limit use and disclosure of the Personal Information to the specific purposes for which Superior supplied it.

#### *International Transfers and Storage of Personal Information*

Superior, its service providers and its business partners may store or process Personal Information outside the jurisdiction of the individual who provided the Personal Information. In those circumstances, Personal Information may be subject to local laws and law enforcement requirements.

Superior does not sell customer information to third parties.
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## **IV. Protection and Retention of Personal Information**

### *Protection of Personal Information*

Superior maintains physical, technical and procedural safeguards that are appropriate to the sensitivity of the Personal Information in question. These safeguards are designed to prevent Personal Information from loss, theft, and unauthorized access, copying, use, modification or disclosure. These safeguards include: passwords, encryption and other electronic security measures; locked or limited access to premises and file cabinets; and security monitoring of premises.

### *Retention of Personal Information*

Except as otherwise permitted or required by applicable law or regulatory requirements, Superior retains Personal Information only for as long as it is necessary to fulfill the purposes for which the Personal Information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). Superior may, instead of destroying or erasing Personal Information, make it anonymous such that it cannot be associated with or tracked back to a specific individual.

## **V. Accessing and Updating Personal Information**

### *Updating Personal Information*

It is important that Personal Information contained in Superior's records is both accurate and current. Superior asks that customers and suppliers keep it informed of changes to Personal Information during the course of the business relationship.

If an individual believes the Personal Information about them held by Superior is not correct, the individual may request an update of that information by making a request to Superior's Privacy Officer



using the contact information set out below. In some circumstances Superior may not agree with the request to change an individual's Personal Information and will instead append an alternative text to the record in question.

#### *Accessing Personal Information*

An individual may ask to see the Personal Information that Superior holds about them. If someone wants to review, verify or correct their Personal Information, they may contact our Privacy Officer. Please note that any such communications must be in writing.

When making an access request, Superior may require specific information from an individual to confirm their identity and their right to access the Personal Information. Superior may charge a fee to access Personal Information; but it will advise of any fee in advance. If help is needed in preparing a request, please contact the office of Superior's Privacy Officer. Where Personal Information will be disclosed to an individual, Superior will endeavour to provide the information in question within a reasonable time and no later than 30 days following the request.

An individual's right to access the Personal Information is not absolute. There are instances where applicable law or regulatory requirements permit or require Superior to refuse a Personal Information access request, such as when

- a) information is prohibitively costly to provide;
- b) information contains references to other individuals;
- c) information cannot be disclosed for legal, security or commercial proprietary reasons; and
- d) information is subject to solicitor-client or litigation privilege.

In addition, the Personal Information may no longer exist, may have been destroyed, erased or made anonymous in accordance with Superior's record retention obligations and practices.

In the event that Superior cannot provide an individual with access to their Personal Information, it will endeavour to inform that individual of the reasons why access has been denied, subject to any legal or regulatory restrictions.

#### *Additional Information for California Residents*

California residents can make certain requests regarding their Personal Information. Superior will fulfill each of these requests to the extent required by law. California residents can ask Superior:

- a) to inform them of the Personal Information Superior has about them, including a list of categories of their Personal Information that we have sold and a list of categories of their Personal Information that Superior has shared with another company for a business purpose;
- b) to delete their Personal Information; and
- c) to stop selling their Personal Information.



In order to exercise these rights, contact our Privacy Officer using the contact information outlined below.

## **VI. Consent**

Superior only collects Personal Information by lawful means. Superior may obtain consent through this Policy or through other means (such as express consent given verbally or in writing). However, in some situations, the law allows Superior to collect, use or disclose Personal Information without consent.

By submitting Personal Information to Superior, you acknowledge and agree that you have consented to the collection, use and disclosure practices set out in this Policy as they relate to your Personal Information.

An individual is entitled to change or withdraw their consent at any time, subject to legal or contractual restrictions (and reasonable notice), by contacting Superior's Privacy Officer using the contact information set out below. In some circumstances, a change in or withdrawal of consent may limit Superior's ability to provide products or services to, or acquire products or services from, that individual.

## **VII. Cookies and Web Analytics**

Superior uses cookies and other tools on Superior websites to collect information on visitors to Superior's websites and how they use the websites.

Cookies that help us run, analyze and improve the websites can be limited by adjusting browser and device settings and cannot be disabled by Superior. Browser support pages provide more information on cookies and how to manage them. If the websites use cookies for profiling or marketing purposes, Superior will ask users for consent before they are activated. In addition, you can customize how Google uses cookies to provide you with relevant advertising across the internet. To do so, visit Google's Ads Settings and turn off the "Ad personalization" setting.

Superior uses Google Analytics to better understand use of Superior websites. Google Analytics collects information including how many times a user visits our website, what pages they visit, and where they were referred from. Google uses the data collected through cookies to track and examine the use of the website, to prepare reports on its activities, and share them with other Google services. Advertising identifiers for mobile devices (such as Android and iOS Advertising Identifiers) are also collected. Google may use the data collected on the websites to contextualize and personalize the ads of its own advertising network.

Google will not associate a user's IP address with any other data held by Google. To learn more about Google Analytics, [click here](#). Users can deactivate the Google Analytics function with a browser add-on, which can be [downloaded here](#).

Because of the rapidly changing state of technology, Superior cannot guarantee that it will be able to honour Do-Not-Track requests sent by an individual's browser.



### **VIII. Contact Information**

If an individual has a question about: (a) access to Personal Information, (b) the collection, use, management or disclosure of Personal Information, (c) changing or withdrawing consent with respect to Personal Information, or (d) this Policy or relevant legislation, they may contact the office of Superior's Privacy Officer in writing or by e-mail at:

200 Wellington St. West, Suite 401  
Toronto, Ontario M5V 3C7  
Attention: Privacy Officer  
[privacyofficer@superiorplus.com](mailto:privacyofficer@superiorplus.com)

Superior endeavours to answer all questions raised in a timely manner, and advise individuals in writing of any steps taken to address an issue brought forward. If an individual is not satisfied with Superior's response, they may be entitled to make a written submission to the privacy authority applicable for their jurisdiction.

### **IX. Policy Revision**

Superior will review and revise this Policy from time to time to reflect changes in legal or regulatory obligations or changes in the manner in which it deals with Personal Information. Any revised version of this Policy will be posted, and individuals are encouraged to refer back to it on a regular basis.

This Policy does not create or confer upon any individual any rights, or impose upon Superior any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's and the United States' federal, provincial and state privacy legislation, as applicable. Should there be, in a specific case, any inconsistency between this Policy and relevant legislation in that jurisdiction, this Policy shall be interpreted, in respect of that case, to give effect to, and comply with, that privacy legislation.