

# Privacy Policy

Probiotech International Inc. («**Probiotech International**» or «**we**» or «**us**») is committed to respecting the privacy of the Personal Information entrusted to us, including during the use of our Site, and to maintaining the confidentiality and security of Personal Information.

This Policy describes Probiotech International's practices regarding the Collection, Use and Disclosure of Personal Information. The application of this Policy remains subject to applicable legislation, including the Act respecting the protection of personal information in the private sector.

## DEFINITIONS

«**Pixel Tag**» means a very small graphic element with a unique identifier that can be used on a website to measure an individual's interactions with that website and the services offered thereon.

«**Collection**» means the acquisition of Personal Information, including from Third Parties; «**Collect**» has a similar meaning.

«**Disclosure**» means the disclosure of Personal Information to a Third Party; «**Disclose**» has a similar meaning.

«**Policy**» means this Privacy Policy.

«**Personal Information**» means any information that relates to a natural person and allows, directly or indirectly, that person to be identified, including but not limited to names, addresses, e-mail addresses and date of birth.

«**Site**» means our website spadioro.com, as well as any other similar platform owned by Probiotech International.

«**Cookie**» means a small text file or piece of data that is downloaded and stored on a computer or device when a website is visited.

«**Third Party**» means a person other than you or Probiotech International.

«**Use**» means the processing, handling and management of Personal Information by Probiotech International; «**Use**» has a similar meaning.

## OUR COMMITMENT

Probiotech International is committed, at all times, to protecting the Personal Information it holds and to respecting its confidentiality. The Collection, Use or Disclosure of Personal Information by Probiotech International will at all times be in accordance with applicable laws and the following guidelines:

- ∅ Personal Information is collected only with the consent of the individual to whom it relates, unless exempted by law;
- ∅ Personal Information is kept strictly confidential;
- ∅ Personal Information is used only for the purposes for which it was collected;
- ∅ Personal Information will be destroyed, de-identified or made anonymous when it is no longer required for the identified purposes or is no longer required by law; and
- ∅ Personal Information will be made available upon request.

## CONSENT

Unless exempted by law, Probiotech International shall inform an individual and obtain his or her consent to the Collection, Use or Disclosure of his or her Personal Information.

## PERSONAL INFORMATION COLLECTED

In the course of interactions with us, we may Collect, Use or Disclose an individual's Personal Information, including :

- ∅ contact information (name, address, e-mail or telephone number);
- ∅ communications with Probiotech International;
- ∅ data on his or her use of the Site and the devices used for that purpose; and
- ∅ recruitment-related information in connection with the submission of an application (curriculum vitae, professional or academic background, etc.).

Probiotech International may also process account information, passwords, profile information and other Personal Information that a person provides to facilitate the use of the Site.

In some cases, Personal Information comprising technical characteristics and general usage data about the software and hardware used in conjunction with the Site may be Collected, Used or Disclosed, including, web browser type, referring or exit web pages, operating system version, computer hardware used and IP address.

We do not collect sensitive information, such as political or religious beliefs, ethnic origin, sexual orientation, health or any other sensitive information.

We do not seek to collect information about minors and if you believe that your child may have provided us with Personal Information, please contact us by contacting our Privacy Officer at the coordinates indicated below.

We will limit the Collection of Personal Information to that which is necessary to achieve the identified purposes and will only collect it by lawful means.

## HOW WE USE PERSONAL INFORMATION

Except where permitted or required by law, we will use Personal Information provided to us only for the identified purposes for which it was collected and will not use it for any other purpose without the consent of the individual concerned.

## COOKIES AND PIXEL TAGS

By accessing our Site, you consent to Probiotech International's use of Cookies and Pixel Tags, which allow Probiotech International, among other things, to recognize you when you visit the Site in order to personalize your browsing experience according to your preferences and to offer you customized services and products on our Site. Most browsers are initially configured to accept Cookies and Pixel Tags. You can usually modify your browser settings to (i) refuse Cookies or Pixel Tags or to indicate when a Cookie or Pixel Tag is being sent; or (ii) remove or block Cookies or Pixel Tags, but this may affect your ability to use the Site, which may not function properly or at all.

## HOW WE PROTECT PERSONAL INFORMATION

We take reasonable steps to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use, modification or destruction, and use appropriate safeguards at all times.

Any person authorized by us who has access to Personal Information must respect its confidentiality.

Probiotech International will destroy, de-identify or anonymize any Personal Information that is no longer required for the purposes identified or required by law in accordance with its established internal controls, schedules and practices.

From time to time, we may engage other affiliates or Third Party Service Providers to assist us in managing our information technology systems used to process Personal Information.

We will only disclose Personal Information to such Third Party Service Providers once we are satisfied that (i) adequate levels of protection are in place to protect the integrity and security of any Personal Information processed; and (ii) applicable privacy legislation is duly complied with. These measures may include the use of standard contractual clauses specifying the confidentiality of Personal Information and the identified purposes.

The Internet is not a secure medium and we make no representations or warranties as to the absolute security of any Personal Information transmitted. You acknowledge that the transmission of Personal Information via the Internet is at your own risk.

## COMMUNICATION AND DISCLOSURE

We do not sell or rent any Personal Information to any Third Party except as provided herein. We may be required to Disclose Personally Identifiable Information in response to legal process, for example, pursuant to a court order or subpoena, at the request of a law enforcement agency, or when we deem it necessary to investigate, prevent or take action against unlawful activities, and otherwise when required by law.

## YOUR RIGHTS REGARDING THE PERSONAL INFORMATION YOU PROVIDE TO US

If you would like us to delete or correct your Personal Information from our records, please contact us using the contact information below and we will respond within a reasonable time.

If you wish to access the Personal Information we hold about you, please contact us using the details below and we will respond within a reasonable time. Your Personal Information will be made available to you in a clear manner and a reasonable fee may be charged. In certain situations, in accordance with applicable legislation, Probiotech International reserves the right to refuse access to all or part of the Personal Information requested.

If you exercise the above rights and have questions about your identity, we may ask you to provide information that will allow us to determine your identity.

## OUR RESPONSIBILITY FOR EXTERNAL LINKS

We may provide links to external resources or other websites, including but not limited to social media sites such as Facebook. If you follow these links, you must use these sites in accordance with their applicable use and privacy policies. Furthermore, we cannot be responsible for the Collection, Use and processing of information that you may provide on these sites.

## CONTACT US

Any comments, requests or complaints regarding the protection of Personal Information may be addressed to our Privacy Officer at the following address:

**Probiotech International inc.**  
6225, boul. Choquette  
Saint-Hyacinthe (Québec), J2S 8L2, Canada

Attention: Privacy Officer

E-mail: [info@probiotech.com](mailto:info@probiotech.com)

**LAST CHANGE: February 21, 2024**