

# Privacy Policy

**Last updated**

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*This English-language translation of our Privacy Policy is presented for informational purposes only. For legal purposes, the original French-language version ("Politique de confidentialité") should be considered the binding document.*

## 1. Objectives of the Privacy Policy

Collectif Récolte, a nonprofit organization working in the field of sustainable food systems ("**Collectif Récolte**", "**we**", "**us**", or "**our**"), takes very seriously the treatment, confidentiality, and security of your Personal Information (as defined below). The protection of Personal Information is rooted in the right to privacy, which is the right of an individual to control who has access to his or her Personal Information (as defined below), when and under what circumstances, in order to prevent any intrusion into his or her privacy. The purpose of this privacy policy (the "**Policy**") is to inform you in a clear and simple manner of our practices and guidelines relating to the use of Personal Information of users of the Tomat platform (the "**Platform**"), available at allotomat.com, and thus to respect this right to privacy.

More specifically, this Policy informs users of the Platform about the types of Personal Information we collect and process as well as the purposes of such collection and processing.

As a reminder, "**Personal Information**" is any information that, alone or in combination with other information, identifies you, directly or indirectly, as an individual.

## 2. Personal information collected

We only collect Personal Information that is necessary for Collectif Récolte to fulfil the purposes identified at the time of collection. The Personal Information we collect may include, but is not limited to:

- Your contact information such as last name, first name, and email address
- Your login information, such as your email address and password
- Transaction information from partner merchants, such as the amount of the transaction, the date and time of the transaction, the location, the name of the partner merchant where the transaction took place, the name of the participant in your programs, and other technical data

- Participant information entered by your program users, such as last name, first name, email address, postal address, telephone number, or other data, as well as the organisation with which they are associated
- Information about the balance of participants' cards in your programs and the ID numbers of the cards
- Information that you may need to provide to our customer service department
- Any other Personal Information you provide to us

## 3. Consent and means of collecting personal information

### 3.1 Directly from you

Users agree that by using our Platform, they consent to: (a) the conditions set out in this Policy and (b) the collection, use, and retention of the Personal Information listed in this Policy.

We generally collect your Personal Information with your consent, unless applicable law provides an exception to this requirement (for example, to comply with our legal obligations, where necessary to establish, exercise, or defend a legal claim or proceeding). Your Personal Information is collected through various means, including:

- The creation and activation of a user account
- Using the Platform
- Contacting us

### 3.2 Indirectly from you

Collectif Récolte does not have a direct business relationship with your program participants, and therefore, users of the Platform must ensure that they have obtained the consent and also the required authorizations from each of your program participants to store and manage their Personal Information on the Platform in accordance with its operation. In particular, your program participants should have consented to have their Personal Information managed by Collectif Récolte according to this Policy.

We also require you to provide any legally required notices to your program participants and to ensure that the use, collection or disclosure of Personal Information between Collectif Récolte and you is authorised.

### 3.3 Refusing collection and withdrawing your consent

You have the right, if you wish, to refuse the collection, use and disclosure of your Personal Information. You may also, at any time, and subject to reasonable notice and applicable legal or

contractual restrictions, withdraw your consent to the use of your Personal Information in our possession by contacting us. You should note, however, that if you choose not to provide us with your Personal Information, this may prevent you, for example, from using the Platform, as this information is essential to the provision of the requested services.

We would also like to inform you that anonymous information, which does not directly or indirectly allow us to know who you are, may be retained even if you withdraw your consent. You may contact us as indicated in the "[Contact Us](#)" section for any questions regarding this matter.

## 4. Uses and purposes of the Personal Information collected

### 4.1 Limited and specific purposes

In general, we use the Personal Information described above for the following purposes

- Identifying users and business partners for login purposes
- Communicating with your program users and business partners in connection with requests for information, or to provide customer service when requested
- Recording transactions for the purpose of reimbursing purchases made by your program participants
- The identification and management of your program participants
- Providing access to the Platform
- Recording transactions for management and analysis by the programs using the Platform
- Any other purposes that we identify from time to time and that are permitted by law

(collectively, the "**Purposes**").

Your Personal Information will never be used for any other Purpose than those listed above. If a new purpose for the Personal Information arises, you will be asked to specifically consent to the new purpose.

Our obligation is limited to Collectif Récolte in the context of the management of the Platform. We cannot guarantee that the organizations managing the programs and partner businesses outside the use of the Platform are compliant with the privacy protection of your Personal Information.

### 4.2 Use for secondary purposes

Depending on the circumstances, Collectif Récolte may also aggregate and anonymise the Personal Information you have provided, in order to create statistical data that Collectif Récolte may use to improve the Platform, examine user and participant interests, measure the impact of the Platform or train machine learning algorithms. Collectif Récolte may also share this information with its third party partners. This statistical data does not include Personal Information.

## 5. Use of cookies or web beacons

When you browse the Platform, cookies, and web beacons may be deposited on your device (computer, tablet, or phone). A cookie is a small text file that is stored in a dedicated location on your computer, mobile device, tablet, or other device when you use your browser to visit an online service. Other tracking technologies, such as web beacons or tracking pixels, may be used for similar purposes. In this Policy, all such tracking technologies are collectively referred to as "**Cookie(s)**". They collect or store certain information as you navigate our Platform. Only the issuer of the cookie file is able to read that file.

### 5.1 Strictly necessary cookies

These Cookies are necessary for the operation of the Platform and cannot be disabled in our systems. Strictly necessary Cookies must be present for the Platform to provide basic functions. They also allow a user to navigate from one page to another without losing previous actions from the same session.

### 5.2 Non-essential Cookies

Currently, Collectif Récolte does not use cookies that are not essential to the functioning of the Platform. If this changes, you will be asked to consent to their use and this policy will be updated.

### 5.3 How to manage Cookies

With the exception of functional Cookies, we will only place Cookies on your devices if you consent to them.

Cookies can be managed and/or disabled via your browser's cookie settings and your mobile device's advertising settings. However, if you refuse Cookies, you may not be able to use all the features of the Platform. If you would like more information on how to manage and/or disable non-essential Cookies, please visit the following sites:

- <https://allaboutcookies.org/>
- <https://optout.aboutads.info/?c=3&lang=en>

## 6. Sharing of Personal Information

### 6.1 Our employees

Your Personal Information is processed by Collectif Récolte staff. We ensure that only authorised persons within Collectif Récolte can access your Personal Information when necessary for the purposes of managing our services or our legal obligations. For example, Collectif Récolte (the project owner of the Platform) must have access to the hosting servers, which implies access to all the data stored in the Platform.

### 6.2 Our strategic partners

Collectif Récolte may share your Personal Information with its partners to the extent that such disclosure is required to achieve the Purposes. Collectif Récolte may use third parties to facilitate its activities, such as hosting service providers, teams working on the management of the Platform (specifically the teams at Sigmund, service provider in charge of the development, optimization, and support of the Platform), and project partners, i.e., participating organizations or businesses. As part of these activities, Collectif Récolte's service providers may have access to your Personal Information for use during a limited period. Where Collectif Récolte uses third parties to process any Personal Information, Collectif Récolte implements reasonable contractual and technical safeguards to ensure that such third parties keep all Personal Information they process strictly confidential. For example, confidentiality agreements are signed by individuals within the partners mandated to work on the Platform. Please note that these third parties may be located elsewhere than where you are located, in which case appropriate measures are taken by Collectif Récolte as set out below in the section "[Transfer and Hosting of Personal Information](#)".

### 6.3 When required by law

Collectif Récolte may also share your Personal Information with third parties to meet legal, regulatory, or contractual obligations, or to respond to requests from legally empowered authorities. Specifically, Collectif Récolte may share your Personal Information if required to do so by law or in the good faith belief that such action is necessary to: (a) comply with the law; (b) comply with an order of a judicial authority in any jurisdiction; (c) comply with legal process served on Collectif Récolte; (d) protect and defend the rights or property of Collectif Récolte; (e) enforce or verify your compliance with any part of your agreements with Collectif Récolte, if any; (f) prevent fraud or other illegal activity through Collectif Récolte's services; or (g) act in urgent circumstances to protect the personal safety of users of Collectif Récolte's services or the general public.

## 6.4 In the context of the transfer of companies

We may share your Personal Information without your permission when our operations require it (for example, in the event of a merger, acquisition, bankruptcy, or sale of assets). In connection with such an event, we may also share some or all of your Personal Information with the relevant third party (or its advisors) as part of a due diligence process.

## 6.5 For other purposes with your consent

If you have expressly consented, your Personal Information may be shared with other third parties. For example, there may be specific instances where additional conditions apply; in these cases, we will make it clear that specific third parties are processing your Personal Information.

## 7. Third party services and platforms

Please note that we may include links on our Platform to third party sites or services that we do not control. These third parties may share certain information about you with us. If you click on one of these links, you will be directed to sites that we do not control. Please read the privacy policies of those sites, applications, or platforms that may collect Personal Information to understand their privacy policies and practices. This Policy applies only to Personal Information processed by or on behalf of Collectif Récolte.

## 8. Transfer and hosting of Personal Information

Some of the recipients of your Personal Information may be located outside of Canada or Quebec. The Personal Information we collect is housed in secure systems hosted on servers that may be located outside your province, territory, or country of residence, including in Canada.

However, we strive to protect Personal Information in our custody, including Personal Information in the custody of an agent or service provider, whether located in Canada or in other jurisdictions or countries. In particular, we endeavour to limit their access to Personal Information to that which is necessary to perform their duties. Any transfer of your Personal Information outside of Quebec or Canada is made with appropriate contractual, technical, organisational and other safeguards in accordance with applicable privacy regulations to ensure the confidentiality and security of your Personal Information. This may include the implementation of robust and effective security measures. If you have any further questions on this subject, you may [contact us](#).

## 9. Duration of retention of Personal Information

The legal retention periods defined by Collectif Récolte respect the recommendations of national authorities on the protection of Personal Information and the legal obligations to which Collectif Récolte is subject. To this end, your Personal Information will be retained only as long as necessary for the fulfilment of the Purposes for which it was collected, or in accordance with Collectif Récolte's legitimate interests, or to comply with applicable legislative, tax or regulatory requirements. At the end of this period, we endeavour to destroy or anonymize the information.

In determining the appropriate retention period for your Personal Information, we consider the amount, nature and sensitivity of the Personal Information involved, the potential risk of harm resulting from unauthorised use or disclosure of your Personal Information, the Purposes for which we process your Personal Information and the possibility of achieving those Purposes by other means, as well as any applicable legal, tax or regulatory requirements. If you would like more information on this subject, please [contact us](#).

## 10. Protection of Personal Information

### 10.1 Necessary and appropriate measures

The Personal Information we collect is kept in a secure environment. We endeavour to apply the necessary and appropriate security measures to ensure the confidentiality of Personal Information in our possession. In doing so, we follow generally accepted industry standards. Personal Information in our possession is therefore only accessible to those persons who have the authority to access it and who only access it when necessary for the performance of their duties.

Appropriate physical, technical, and administrative safeguards and security measures have been put in place and are maintained to minimise the risk of incidents. To ensure the security of your Personal Information, we use, for example, the following measures

- SSL protocol for communication between the web interface and the hosting server
- Access management - authorised person
- Restricted access to the physical office and Personal Information

We have carried out a security audit of the Platform by an external company in order to assess the quality of the security measures in place and thus ensure the confidentiality of Personal Information within the Platform. This report will be available for your consultation soon.

If you believe that your Personal Information has been compromised, we invite you to [contact us](#).

## 10.2 Privacy of children

Our Platform is only available to persons 14 years of age or older. Collectif Récolte does not knowingly process Personal Information from children under the age of 14, unless a parent or legal guardian has consented. If you believe that Personal Information has been collected from children under the age of 14 without your prior consent, you may contact Collectif Récolte as described in the "[Contact Us](#)" section.

## 11. Individual rights

Under applicable Canadian law, you may have certain rights in relation to your Personal Information, such as the right to access and rectify your Personal Information, the right to re-index or de-index your Personal Information, the right to withdraw your consent (if applicable) and the right to request deletion of your Personal Information, and to obtain portability of your Personal Information, i.e., the right to receive a copy of all the Personal Information that Collectif Récolte holds about you in a structured, commonly used and machine-readable format. You also have the right to make specific or general instructions regarding access to and disclosure of your Personal Information post-mortem.

You also have the right to lodge a complaint with the appropriate authority at any time if you believe that Collectif Récolte is not processing your Personal Information in accordance with this Policy or applicable laws.

Please note that any request to exercise a right made by a participant in your programs should be made directly by you. Collectif Récolte will assist you, if necessary.

If you wish to request access to your Personal Information, or make a request to have it deleted or amended, please contact us at the coordinates described in the "[Contact Us](#)" section.

## 12. Changes and updates to the Policy

This Policy may be changed, updated, revised, or supplemented at any time at the discretion of Collectif Récolte to maintain compliance with the law and to reflect any changes to our collection and use of Personal Information.

If there are material changes to the Policy, you will be notified when you log in and/or we will notify you by email. The Policy and any related agreements, if any, will be posted on our Platform. Collectif Récolte asks its users to review the revised Policy before continuing to use its Platform.



## 13. Contact us

Collectif Récolte has established procedures to receive complaints and enquiries about its policies and practices relating to the management of Personal Information, including with respect to the retention and destruction of Personal Information, the role and responsibilities of Collectif Récolte members and the handling of privacy complaints. We will inform individuals who make enquiries or lodge complaints of the existence of the relevant procedures. Collectif Récolte will investigate all complaints. If a complaint is found to be justified, we will take appropriate measures, including, if necessary, amending our policies and practices. Please feel free to contact us with any questions, enquiries, comments or complaints about your Personal Information. To do so, you may contact our Privacy Officer by e-mail at the following address:

**COLLECTIF RÉCOLTE**

Business address: 204-5570 rue Cartier, Montréal, (Québec) H2H 1X9 Canada

***Responsable de la protection des Renseignements personnels***

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