

# Privacy Policy and Personal Information Retention Policy



*This English-language translation of our Privacy Policy and Personal Information Retention Policy is presented for informational purposes only. For legal purposes, the original French-language version ("Politique de confidentialité et de conservation des renseignements personnels") should be considered the binding document.*

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# Privacy Policy

## 1. Objectives of the Privacy Policy

Collectif Récolte, a non-profit company working in the field of sustainable food systems ("**Collectif Récolte**", "**we**" or "**us**"), places particular importance on the treatment, confidentiality and security of your Personal Information (as defined below). The protection of Personal Information is part of the respect for the right to privacy, which is the right of an individual to control who has access to their Personal Information (as defined below), when and under what circumstances, in order to prevent any intrusion into their 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 the Personal Information of users of the Tomat platform (the "**Platform**"), available at [allotomat.com](http://allotomat.com), and thus to respect this right to privacy.

More specifically, this Policy informs users of the Platform about the type of Personal Information that we collect and process, as well as the purposes of this collection or processing and the procedures involved.

For reference, "**Personal Information**" is any information that, alone or in combination with other information, makes it possible to identify you, directly or indirectly, as an individual.

## 2. Personal Information collected

We only collect Personal Information that is necessary for Collectif Récolte to fulfill 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, such as the amount, the date and time, the location, the name of the partner merchant where the transaction took place, the name of the participant in your program, and other technical data
- Information about participants entered by users of your program, such as surname, first name, email address, postal address, telephone number, or other data, as well as the organisation with which they are associated
- Information about card balances of participants in your programs and their card numbers
- Information that you may need to communicate to our user support team
- Any other Personal Information you provide to us

## 3. Consent and methods for the collection of Personal Information

### 3.1 Directly from you

Users agree that by using our Platform, they consent to: (a) the terms and 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 principle (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 by various means, including:

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

### 3.2 Indirectly from you

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

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

### 3.3 Refusal of collection and withdrawal of your consent

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

You should also be aware 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 can contact us as indicated in the "[Contact Us](#)" section if you have any questions on this subject.

## 4. Use and purposes of 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 partner merchants for login purposes
- Communicating with users and partner merchants in connection with requests for information, or in order to provide customer service when required
- Recording transactions for the purpose of repaying purchases made by participants in your programs
- Identifying and managing your program participants
- Providing access to the Platform
- Recording transactions for management and analysis by the user program
- Any other occasional purposes that we identify and that are authorised by law

(collectively, the « **Purposes** »).

Your Personal Information will never be used for any purpose other than those listed above. If a new purpose for the Personal Information should arise, you will be asked to provide specific consent for the new purpose.

Our commitment applies only to Collectif Récolte in connection with the management of the Platform. We cannot guarantee that your program's partner organisations or merchants, outside the use of the Platform, comply with the 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 generate statistical data that Collectif Récolte may use to improve the Platform, examine the interests of users and participants, 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 any Personal Information.

## 5. Use of cookies or web beacons (“Cookies”)

When you browse the Platform, cookies and web beacons may be stored on your device (computer, tablet, or telephone). 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 and tracking pixels, may be used for similar purposes. In this Policy, all these tracking technologies are collectively referred

to as "Cookie(s)". They make it possible to collect or remember certain information when you browse our Platform. Only the issuer of the cookie file is able to read this file.

## 5.1 Strictly necessary Cookies

These Cookies are necessary for the functioning of the Platform and cannot be deactivated 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 operation of the platform. If this changes, you will be asked for consent to their use and an update to this policy will be made.

## 5.3 How to manage Cookies

With the exception of necessary Cookies, we will only place Cookies on your devices with your consent.

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 managed by staff at Collectif Récolte. We ensure that only authorised persons within Collectif Récolte have access to your Personal Information when this is necessary for the purposes of managing our commercial relationship 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 on the Platform.

## 6.2 Our strategic partners

Collectif Récolte may share your Personal Information with its partners insofar as such disclosure is required to achieve the Purposes. Collectif Récolte may call upon third parties to

facilitate its activities, such as hosting service providers, teams working on the management of the Platform – specifically the employees of Sigmund (the service provider in charge of developing, optimizing, and maintaining 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 and use of your Personal Information for a limited period of time. 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 strictly confidential all Personal Information they process. For example, confidentiality agreements are signed by the people working on the Platform within the mandated partners. Please note that these third parties may be located elsewhere than where you are, in which case appropriate measures are taken by Collectif Récolte, as indicated below in the section "[Transfer and hosting of Personal Information](#)".

### 6.3 Where required by applicable law

Collectif Récolte may also share your Personal Information with third parties to comply with legal, regulatory or contractual obligations, or to respond to requests from legally authorized authorities. More specifically, Collectif Récolte may share your Personal Information if required to do so by law or if Collectif Récolte believes, in good faith, that such action is necessary to: (a) conform to the law; (b) conform to the order of a judicial authority having jurisdiction in any territory; (c) conform to 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 of the general public.

### 6.4 As part of a business transfer

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 the event of such an event, we may also share your Personal Information, in whole or in part, 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 requirements apply and, through these, we 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 Personal 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

Certain recipients of your Personal Information may be located abroad, including outside Quebec or Canada. The Personal Information we collect is hosted in secure systems 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 entrusted to an agent or service provider, whether they are 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 the tasks entrusted to them. Any transfer of your Personal Information outside Québec or Canada is made subject to appropriate safeguards, including contractual, technical, and organisational safeguards, in compliance with applicable regulations on the protection of Personal Information in order 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, please [contact us](#).

## 9. Retention period of Personal Information

The legal retention periods defined by Collectif Récolte comply with 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 only be kept for as long as is necessary to achieve the Purposes for which it was collected, or in accordance with the legitimate interests of Collectif Récolte, or to comply with applicable legislative, fiscal or regulatory requirements. At the end of this period, we endeavour to destroy or render anonymous this information.

In determining the appropriate retention period for your Personal Information, we take into account the amount, nature, and sensitivity of the Personal Information involved, the potential risk of harm resulting from unauthorized 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 legislative, fiscal, or regulatory

requirements. If you would like more information on this subject, we invite you to consult the [Personal Information Retention Policy](#) section.

## 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 all necessary and appropriate security measures to guarantee the confidentiality of the Personal Information in our possession. To this end, we follow generally recognised industry standards. The Personal Information in our possession is therefore accessible only to those persons who have the authority to access it and who consult it only when necessary for the performance of their duties.

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

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

The Platform has been audited by an external company in order to assess the quality of the security measures in place and to ensure the confidentiality of Personal Information on the Platform. You can view the report by clicking the following link:

[https://drive.google.com/file/d/1Powok2GJ7B5EHx7m4g0xKYPb\\_q02Gj57/view](https://drive.google.com/file/d/1Powok2GJ7B5EHx7m4g0xKYPb_q02Gj57/view)

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

### 10.2 Privacy of children

Our Platform is available only 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 prior consent, you may contact Collectif Récolte using the information provided in the "[Contact Us](#)" section.

## 11. Rights of individuals

Under applicable Canadian law, you may have certain rights with respect to your Personal Information, such as the right to access and rectify your Personal Information, the right to have your Personal Information re-indexed or de-indexed, the right to withdraw your consent (if



applicable) and the right to have your Personal Information erased or made portable, i.e., the right to receive a copy of all Personal Information Collectif Récolte holds about you in a structured, commonly used and machine-readable format. You also have the right to formulate specific or general instructions concerning access to and communication of your Personal Information post-mortem.

You also have the right to lodge a complaint with the appropriate authorities 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 to you. Collectif Récolte will assist you if necessary.

If you would like to request access to your Personal Information, or make a request for deletion or amendment of such data, please contact us using the information provided in the "[Contact Us](#)" section.

## 12. Changes and updates to the Policy

The Policy may be amended, updated, revised or supplemented from time to time at the discretion of Collectif Récolte, in order to maintain compliance with the law and to reflect any changes to our process for collecting and using Personal Information.

In the event of significant 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 will be posted on our Platform. Collectif Récolte requires its users to review the revised Policy before continuing to use its Platform.

## 13. Contact Us

Collectif Récolte has established procedures for receiving complaints and enquiries about its policies and practices relating to the management of Personal Information, including the retention and destruction of Personal Information, the role and responsibilities of members of Collectif Récolte, and the handling of complaints relating to the protection of Personal Information. 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 do not hesitate to contact us if you have any questions, requests for information, comments, or complaints about your Personal Information. To do so, you may contact our Personal Information Protection Officer by email at the following address:

## Personal Information Protection Officer

*Dominique Lalonde*

Email address: [dominique@recolte.ca](mailto:dominique@recolte.ca)

## Complaints Handling Officer

*Mathilde Ravenel*

Email address: [support@allotomat.com](mailto:support@allotomat.com)

## Collectif Récolte

Adresse du siège social : 204-5570 rue Cartier, Montréal, (Québec) H2H 1X9 Canada

# Personal Information Retention Policy

## 1. Description of the data retention policy

*A "data retention policy should set out in plain language a document retention schedule that identifies the minimum and maximum durations of data retention and removal for legal and operational purposes. It therefore covers the archiving and destruction of data."* - Nord Ouvert [translated from the original French]

## 2. Objectives

- Comply with regulations concerning the storage of personal information;
- Comply with the commitments set out in our privacy policy and the platform's terms of use;
- Establish a personal information retention schedule;
- Establish a clear process for retaining and deleting personal information;
- Establish the roles and responsibilities of each stakeholder in the process of retaining and deleting personal information;
- Work towards digital sobriety.

## 3. Use of stored personal information

Personal information is kept for the following purposes:

- Connecting to the platform
- Managing participants within the platform
- Communication with participants
- Communication of transaction reports to merchants
- Card identification
- Validating the identity of a cardholder so that a new card can be sent in the event of loss or damage
- Statistics and analysis of food coupon programs
- Compliance with applicable laws and regulations on financial reporting and accounting

## 4. Data retention and destruction procedure

### 4.1 Backups

Two types of backup of the Tomat platform database:

- Long-term: one backup per week (on Tuesdays) which is kept for 1 month. However, the first backup of each month (the first Tuesday of each month) is kept for 1 year.

- Point in time: You can go back in time to the minute, up to a week in the past.

Users can also export participant and transaction data from the Tomat platform.

## 4.2 Right to be Forgotten

### 4.2.1 Description

The right to be forgotten ensures that any person may, subject to the acceptance of the person responsible for the protection of personal information and in very specific cases and in compliance with legal obligations, shorten the period for which the data defined in this policy is kept.

### 4.2.2 Destruction Procedures

Each request made by a user to delete this personal information must be recorded in the register of complaints and incidents of the Tomat platform.

A ticket must be created in the Github dashboard and communicated to Sigmund to proceed with the deletion.

Once Sigmund has received confirmation that the data has been deleted, the ticket is updated to Resolved status and the complaints and incidents register is updated.

## 4.3 Fin de l'entente avec un programme partenaire

### 4.3.1 Description

Each food coupon program receives a licence to use the Tomat platform. The agreement signed with the programs using the platform lasts for one year and is renewable.

If a partner program does not wish to renew its agreement, we are obliged to delete all data held by that program from the Tomat platform.

### 4.3.2 Destruction Procedures

A ticket must be created in the Github dashboard and communicated to Sigmund to proceed with the deletion.

Once Sigmund has received confirmation that the data has been deleted, the ticket is updated to Resolved status and the complaints and incidents register is updated.

## 4.4 Rules for Storing Personal Information

### 4.4.1 Description

The personal information of users of the Tomat platform and participants in the food coupon programs is kept in raw format within the Tomat platform in accordance with the following rules:

- Users: 5 years after the last connection to the platform
- Participants:
  - With subscription: 5 years after the last subscription expiry date
  - No subscription and no gift amount: 5 years after the date of entry to the platform
  - No subscription but with a gift amount (no expiry date): 5 years after the last use of the card by the cardholder.

Data relating to participants that is not considered to be personal information (transactions, subscriptions, categories, card ids, etc.) will be archived in an anonymised format for analysis purposes.

The table below summarizes the personal information collected by the Tomat platform:

Personal information	Profile
Family name	User
First name	User
Email address	User
Family name	Participant
First name	Participant
Email address	Participant
Home address	Participant
Postal code	Participant
Phone number	Participant
Notes	Participant.e
Id 1	Participant.e
Id 2	Participant.e

### 4.4.2 Destruction Procedures

The destruction of personal information is automated by means of a script each month in accordance with the rules specified in section [4.4.1 Description](#).

With regard to the destruction of accounts that have been inactive for five (5) years, the users concerned will be notified prior to deletion.

#### 4.5 Vérification

Validity and quality tests will be carried out by Sigmund at key points to validate that the data deletion process has worked.

### 5. Retention Schedule

Retention schedule of sensitive data and personal information on the Tomat platform is available upon request from the [contact person](#).

### 6. Changes and Updates to this Policy

The data retention policy will be reviewed annually to maintain compliance with the law and to reflect any changes to our process for collecting and using personal information.

In the event of significant changes to the policies, the persons concerned will be informed by email.