

Number: POL.RP.01
Effective date¹:
Scheduled for review on:

Privacy Policy – Recruitment

REVISION HISTORY

Version	Date	Author	Description
0.1	2023-02-06	É. Courchesne Tardif	Initial draft for comment
0.2	2023-02-06	P. Nicot	First review and formatting
0.3	2023-07-13	É. Courchesne Tardif	Final version

The Organization’s managers are responsible for ensuring that employees, clients and suppliers under their department’s control are informed of the rights and obligations set out in this document at all relevant times.

APPROVAL

Saad Chafki

28-08-2023

Signature

Date

Job title

Senior Vice-President, Information Technology,
and Privacy Officer, Sollio Cooperative Group
and Sollio Agriculture

¹ This Policy supersedes all *Policies* previously issued on this subject. The *Organization* may amend, suspend or revoke these *Guidelines* at any time without notice.

TABLE OF CONTENTS

1. OBJECTIVES.....	3
2. WHAT IS THE SCOPE OF THIS PRIVACY POLICY?	3
4. DO WE DO CONDUCT A CRIMINAL RECORD CHECK?.....	5
5. DO WE COLLECT INFORMATION On YOUR VACCINATION STATUS?	6
6. DO WE OBTAIN PRE-EMPLOYMENT MEDICAL NOTES?	6
7. DO WE PERFORM PSYCHOMETRIC TESTING?	6
8. DO WE ADMINISTER LANGUAGE PROFICIENCY TESTS?.....	6
9. DO WE SHARE YOUR PERSONAL INFORMATION WITH THIRD PARTIES?.....	7
10. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?	8
11. WHERE DO WE STORE YOUR PERSONAL INFORMATION?.....	9
12. HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?	9
13. WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL INFORMATION?.....	9

1. OBJECTIVES

The Privacy Policy – Recruitment (the “Policy”) applies to Sollio Cooperative Group (Parent Company), having its head office at 200-9001 Boulevard de l’Acadie, Montreal, Quebec, Canada H4N 3H7, as well as to the entities in the Sollio Agriculture Division and BMR Group Inc. For job applicants, in this Policy, the terms “Division,” “Organization,” “we” and “our” refer to the *Division* to which they are applying.

The purpose of this Policy is to provide you with information on how we collect, use and disclose your personal information during the course of the recruitment process, and provide you with information on your rights.

If you have questions about your Personal Information, know that we have appointed a Privacy Officer in certain employer entities, namely Sollio Cooperative Group (Parent Company), and all entities in the Sollio Agriculture Division and BMR Group Inc., who may be contacted for any questions that you may have or to exercise any rights in relation to your personal information (the Privacy Officer).

Please refer to the Privacy Officer of the employer to whom you are applying:

Employer	Title of person in charge	Email
Sollio Cooperative Group (Parent Company)	Privacy Officer for the Parent Company	Vieprivee_privacy@sollio.coop
Entities in the Sollio Agriculture Division	Privacy Officer for Sollio Agriculture	Vieprivee_privacy_AG@sollio.aq
BMR Group Inc.	Privacy Officer for Sollio Retail	Vieprivee_privacy@bmr.co

You have the right to ask questions about how we process your personal information and to exercise your rights in relation to it, as explained below. If you do so, we will not discriminate against you and will provide you with the information you need with integrity.

2. WHAT IS THE SCOPE OF THIS PRIVACY POLICY?

This Policy applies when we process candidates’ personal information as part of the recruitment process (e.g., processing resumes, criminal record checks, interviews, etc.); i.e., the process during which we evaluate your application and which may lead, in applicable cases, to the signature of an employment contract or of a letter of acceptance. Therefore, it does not apply to processing our employees’ or clients’ information or to our marketing activities.

The Policy applies when, as part of the recruitment process, you use our websites or talent acquisition platforms.

Please note that, as part of our recruitment activities, certain third parties may collect your personal information and then redirect it toward us by various means (including platforms such as LinkedIn, Indeed and the administrator of the “Careers” page of our website). These third parties may process your

personal information for their own purposes, in which case they are required to comply with all privacy and confidentiality legislation applicable to their activities. We have no control over the privacy practices of these third parties. It is therefore your responsibility to read their privacy and confidentiality policies in order to ensure that your personal information is protected. The scope of this Policy is limited to informing you of the organization’s privacy practices following receipt of your application information.



In this Policy, “**personal information**” means any information concerning a natural person that can be used to directly or indirectly identify them (e.g., last name, first name, mailing address, phone number, social insurance number).

Certain information deemed to constitute personal information for the purposes of this policy may not be protected under applicable legislation, and you may not have the same rights with respect to such personal information. For example, in many provinces, business contact information such as names, titles, positions, addresses, email addresses and workplace phone numbers are excluded from protections afforded by law.



Processing personal information means any activities involving the collection, retention, access, use, disclosure, communication, destruction or anonymization of personal information, whether on our computer systems or in traditional paper files.

3. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU, AND FOR WHAT PURPOSES?

When you apply for a job, we collect various types of personal information. **Table 1** details the various purposes for which we collect personal information and examples of the personal information collected for these purposes. Please note that the personal information we collect may vary depending on the requirements of the position offered or other circumstances such as the type of duties or roles and responsibilities of the position to be filled.

You may withdraw your consent for the use or retention of your personal information at any time. Withdrawal of consent may, however, affect our ability to process your application.

Table 1: Examples of types of personal information collected

Purposes for collecting	Type of personal information collected	Examples of the type of information collected for this purpose* ²
Evaluate the candidate’s application and ability to perform the duties of the position	<ul style="list-style-type: none"> • Socio-demographic information • Contact information • Information related to the candidate’s work experience 	<ul style="list-style-type: none"> • First and last name • Email address • Candidate resumes and recruitment files, including employment history • Personal phone number • Home address • Checks of references provided on resume*
Evaluate job requirements	<ul style="list-style-type: none"> • Government identifiers • Pre-employment test results • Criminal record • Credit-related information* 	<ul style="list-style-type: none"> • Driver’s license number, when required for the job in question • Language skills results. See Section 8 for further details. • Credit rating* • Criminal record. See Section 4 for further details.
Assess your ability to perform the work required.	<ul style="list-style-type: none"> • Pre-employment test results 	<ul style="list-style-type: none"> • Skills test results* • Psychometric test results* • Results of a pre-employment medical assessment*
Comply with legal requirements and ensure the health and safety of our staff	<ul style="list-style-type: none"> • Medical information 	<ul style="list-style-type: none"> • Vaccination status. See Section 4 for further details.
To ensure the security of our computer networks and systems, if the candidate has access to a company computer workstation	<ul style="list-style-type: none"> • Interactions with corporate information assets 	<ul style="list-style-type: none"> • Electronic logs, including access logs • IP addresses • Login dates and times • Login geolocation data

4. DO WE DO CONDUCT A CRIMINAL RECORD CHECK?

² Note that in specific cases where it is necessary to collect the personal information indicated with an asterisk (*), we will obtain express consent on a separate form.

During our recruitment process, many positions require a criminal record check as a prerequisite for employment. We conduct criminal record checks through an external service provider.

When necessary, we conduct criminal record checks for the following purposes:

- Comply with our clients' contractual requirements
- Protect staff and company assets against fraud and other types of internal threats, when required by the position or function
- Comply with legal requirements

Criminal records unrelated to the position applied for, or for which a pardon has been granted, will not be taken into account. Where appropriate, we will determine whether your criminal record affects your employment and give you the opportunity to comment.

5. DO WE COLLECT INFORMATION ON YOUR VACCINATION STATUS?

We collect information on vaccination status for Coronavirus Disease 2019 (COVID-19), when required by law.

6. DO WE OBTAIN PRE-EMPLOYMENT MEDICAL NOTES?

Under certain circumstances, particularly when hiring for a job involving physical tasks, we may ask a candidate to complete a medical questionnaire to verify that they have no medical impediments that might hinder their ability to perform the duties of the position. The questionnaire is completed with the candidate's consent.

This medical questionnaire is administered by a third-party service provider and reviewed by a doctor or nurse. This medical information is used solely to confirm the candidate's physical aptitude for the position. Medical questionnaires and the information they contain are not shared with us. However, the conclusions of the medical questionnaires are communicated to us and to our insurer, if the candidate is hired.

7. DO WE PERFORM PSYCHOMETRIC TESTING?

As part of our hiring process, we may perform psychometric testing on candidates shortlisted for a position. Psychometric testing can be used to help us assess the match between your application and the position to be filled, and to develop more objective knowledge of a candidate.

Psychometric testing is conducted by the candidate on the platform of our service provider.

8. DO WE ADMINISTER LANGUAGE PROFICIENCY TESTS?

Under certain circumstances, such as when hiring for a job requiring proficiency in English, French, or other languages, we will conduct a language proficiency test.

In such cases, recruiters may take notes on candidates’ language skills. The information collected is used solely to verify the candidate’s fulfillment of the language requirements for employment purposes.

9. DO WE SHARE YOUR PERSONAL INFORMATION WITH THIRD PARTIES?

Yes, under certain circumstances we may share your personal information with third parties, such as external suppliers that we use as part of the recruitment process. In such cases, we ensure that we have entered into agreements in which these third parties agree to conditions including implementing appropriate security measures and using your personal information only for the purposes for which we disclosed it to them. In Table 2 below, we have categorized these third parties and included explanations of how personal information is shared.

Table 2: Categories of third parties

Categories of Third Parties	Explanation
IT services	We use suppliers to provide our IT infrastructure. For example, we may use information technology suppliers to host your human resources files, such as documents relating to your recruitment with us and policies that you have read and approved.
Suppliers	We may need to share your personal information during the hiring process in order to perform routine pre-employment checks, including criminal record checks and credit checks.
Other group entities	The entity conducting the recruitment process may call on the services and expertise of persons employed by other affiliated group entities to provide administration, analysis and advisory services for the applications received during the recruitment process.
Law enforcement agencies	<p>We may be required to share your personal information based on applicable laws or their application. For example, if we receive a court order requiring us to share your personal information, we will first consult our lawyers to ensure that we are required to share your personal information, and, if necessary, we will inform you before sharing such personal information.</p> <p>Where permitted by law, we may also share your personal information with law enforcement agencies in order to prevent, detect or suppress a crime or breach of any law. As such, we reserve the right to report any infraction you commit in the course of the recruitment process.</p>
Government agencies	We share your personal information with government agencies when required to do so by law or to permit the application of the law, e.g., for tax or immigration purposes.

	Government agencies are not suppliers and process your personal information in accordance with their own privacy policies.
--	--

As part of a business transaction and in compliance with applicable regulatory requirements, we may disclose your personal information as required, without your prior consent, for the purposes of completing the transaction.

In such cases, your personal information will be used only for the purposes of completing the business transaction. In addition, third parties to whom personal information is disclosed as a result of the business transaction will not have the right to disclose your information without your consent, will be required to take appropriate measures to protect the confidentiality of the personal information and will be required to destroy the personal information if the business transaction is not completed. Once the business transaction is completed, we will ensure that you are informed of the transaction and of the transfer, if any, of the personal information.

10. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We have implemented reasonable technical, administrative and physical security measures to protect your personal information. These measures take particular account of the sensitivity of such *Personal Information*, the purpose for which they are used, and their quantity, distribution and medium. For example, we have put in place policies establishing the framework for information security and the protection of personal information, including a guideline on the retention and elimination of personal information.

We use service providers who implement appropriate measures to manage and protect the personal information entrusted to them.

11. WHERE DO WE STORE YOUR PERSONAL INFORMATION?

Our servers, including those providing cloud services, are hosted in Canada, and we adhere to the principles applicable under Quebec law with regard to data retention by third parties. However, we do use third-party suppliers who may have servers located in Canada or the United States.

When your personal information is located outside Quebec, it may be subject to laws that differ from Canadian law and do not afford the same protections as Canadian law. However, we address this by signing contractual agreements with suppliers stipulating that your personal information may only be transferred outside Quebec in cases where it is adequately protected, including with respect to generally accepted principles for the protection of personal information.

12. HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, or longer if we are required or permitted to do so under applicable law. For example, we may retain personal information for purposes beyond the purpose for which it was collected if it could be used as evidence in an investigation or legal dispute.

Our Guideline – Retention of Personal Information provides guidance by defining retention periods for the various types of personal information we collect and outlines methods used to destroy such information.

13. WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL INFORMATION?

Your rights with respect to your personal information depend on the laws applicable to you. Whether or not you can legally exercise your rights depends on the law and the circumstances, but we will do our best to assist you whenever possible.

In general you have the right to obtain confirmation that personal information is held, to access your personal information, and to rectify it when it is out of date, incomplete or inaccurate, depending on the circumstances. You may also withdraw your consent to our processing of your personal information at any time, but this may affect our ability to process your application.

You may also file complaints about how we handle your personal information, or any other concerns about your privacy, directly with the Privacy Officer of the employer concerned. We will treat your complaint seriously and take all appropriate action.

To file a complaint, you may contact the appropriate Privacy Officer and indicate that you wish to file a complaint. The manager will then send you a complaint form. The complaint will be processed by the Privacy Officer. Barring exceptional circumstances, a decision on your complaint will be made within the period provided for by law, or within a reasonable time of submitting the complaint. There will be no discrimination or retaliation against any individual who files a complaint.

Please note, however, that filing a complaint with the Privacy Officer does not suspend the time limits for exercising remedies provided by law.

Moreover, you should know that you have the right to contest our decision, or to file a complaint with the competent authorities in the province where you work.

If you are applying for a position in the province of Quebec, please contact the Commission d'accès à l'information (CAI) at www.cai.gouv.qc.ca, or contact them directly:

Quebec City	Montreal
Suite 2.36 525 Boulevard René-Lévesque Est Quebec City, QC G1R 5S9 Phone: 418-529-7741 Fax: 418-529-3102	Suite 900 2045 Rue Stanley Montreal, QC H3A 2V4 Phone: 418-529-4196 Fax: 418-529-6170

If you are applying in Alberta, please contact the Office of the Information and Privacy Commissioner of Alberta at www.oipc.ab.ca, or contact them directly.

Office of the Information and Privacy Commissioner (Edmonton)	Office of the Information and Privacy Commissioner (Calgary)
#410 – 9925 109 Street NW Edmonton, AB T5K 2J8 Phone: 1-780-422-6860. Fax: 1-780-422-5682. Toll-Free: 1-888-878-4044.	Suite 2460, 801 6 Avenue SW Edmonton, AB T2P 3W2 Phone: 1-403-297-2728. Fax: 1-403-297-2711. Toll-Free: 1-888-878-4044.

If you are applying in British Columbia, please contact the Office of the Information and Privacy Commissioner for British Columbia [at www.oibc.bc.ca](http://www.oibc.bc.ca).

Office of the Information and Privacy Commissioner for British Columbia
PO Box 9038 Stn. Prov. Govt. Victoria, BC V8W 9A4 4th Floor, 947 Fort Street, Victoria, BC V8V 3K3 Phone: 1-250-387-5629. Callers outside Victoria can contact the office toll-free by calling Enquiry BC and requesting a transfer to 250-387-5629.

If you are applying in other Canadian provinces, you may contact the Office of the Privacy Commissioner of Canada at www.priv.gc.ca.

Office of the Privacy Commissioner of Canada

30 Victoria St.

Gatineau, QC K1A 1H3

Telephone (toll-free): 1-800-282-1376.

Phone: 1-819-994-5444.

ATS: 1-819-994-6591.