

Data privacy and personal information policy Technological and electronic tools

Thank you for visiting the VESTSHELL website and reading our privacy policy (hereinafter the Policy).

By browsing our website or using our systems or services, you acknowledge that you have read and understood this Policy and consent to the processing of your personal data and information in accordance with this Policy, where applicable.

This Privacy Policy consists of the following components:

- 1. Purpose of the Privacy Policy;
- 2. Effective Date;
- 3. How consent is obtained;
- 4. Purpose of data collection;
- 5. Data processing purposes;
- 6. Personal information collected:
- 7. Processing methods used:
- 8. Access and control of personal information;
- 9. Sharing and reasons for sharing personal information with third parties;
- 10. Use of cookies and similar technologies;
- 11. Retention of Personal Information.

1. Objectives of the Privacy Policy:

Respect for privacy and the protection of personal information are essential to us, which is why, through this Policy, we intend to protect such information in accordance with applicable laws.

To ensure this protection, VESTSHELL will only collect, process and share personally identifiable information with the consent of the individual, unless permitted or required by law, in which case your consent will not be required.

The purpose of the Policy is to inform users of why and how VESTSHELL, or anyone acting on its behalf, will collect and use their personal information. It is intended to be in plain language to ensure informed consent from users.

For the purposes of this Policy, "personal information" means any information about an identifiable individual or information that allows an individual to be identified. Wherever possible, we will anonymize,

pseudonymize and/or aggregate such information so that it no longer identifies an individual.

2. Effective date

This Policy is effective as of October 18th, 2023.

This Policy replaces and supersedes any previous Privacy Policy.

3. Consent procedures

We are committed to obtaining consent before collecting personal information from an individual. Consent may be express or implied, and may be provided directly by the individual or by his or her authorized representative.

We prefer to obtain express consent, whether verbally, electronically or in writing. However, implied consent may be reasonably inferred from a person's action or inaction. For example, providing a name and address to receive a publication, or a name and telephone number to obtain an answer to a question, is considered implied consent to the collection of information containing personal information. In determining the appropriate type of consent, we take into account the sensitivity of the personal information involved, the purposes for which it is collected and the reasonable expectations of a similarly situated individual.

If we want to use personal information for a new purpose, we will describe the intended use and ask for consent again.

It is not always possible, particularly in the context of a government request, to obtain consent from an individual to collect, use or disclose his or her personal information. We will never disclose such information, other than in accordance with this Policy, except as required or permitted by law.

4. Purpose of data collection

Information is collected in accordance with the purposes and objectives set out in this privacy policy.

Here are some of the reasons we collect your personal information:

8.2-F15 Rev.0 Page 1 sur 5

To provide products and services: We will collect and process the data and information necessary to fulfill our mission and contractual obligations.

To provide and improve these products and services: Data collected during your interactions with our services may be used to analyze and improve our products and services.

To develop new products and services and for AI: The data collected may be used in a research and development context to offer new products and services to our users. In addition, collected and aggregated data may be processed by algorithms using artificial intelligence.

To offer personalized products and services:

Collecting and analyzing the data generated by your interactions with our services enables us to develop and create products and services that are relevant and always best meet your expectations, particularly in order to plan adaptation measures for customers who require them.

To evaluate the performance of products and services: Data is collected to provide us with information on the advantages and disadvantages of our products and services, so that we can evaluate and resolve them if necessary, notably by means of surveys. This enables us to ensure the quality of our products and services, as well as promoting risk management.

To protect the privacy of our users: The data we collect enables us to verify the identity and protect the privacy of people who communicate with us by telephone, electronically or otherwise.

To meet legal obligations: Data is collected to meet obligations arising from laws, regulations or international treaties.

5. Personal information collected

VESTSHELL may collect personal information in various forms, but will only do so by lawful means and only for the necessary purposes disclosed to you, as described in this Policy, or as permitted or required by law.

The personal information collected, and its sensitivity, may vary depending on the context of your interactions with VESTSHELL. This is why it is our priority to inform you of the nature of the personal information we use.

We protect all personal information we collect. Among the personal information that may be collected and used, we pay particular attention to: Name and contact information. First and last name, e-mail address, mailing address, telephone number and other similar data used to contact you.

Credentials. Passwords, password hints and similar security information used to identify you and access your account.

Demographic information. Information about you such as your age, gender, country and language of communication.

Subscription data. Information about your newsletter subscriptions.

Interaction data. Data relating to your use of the websites, platforms and tools created. This is data you provide in order to use the products. In other cases, such as error reports, this is data we generate.

Other examples of interaction data we collect include:

Data on sites visited and usage. For example: problem resolution and help data. Data you provide when you contact VESTSHELL for assistance, including the products you use, and other information that helps us solve your problem.

Searches and orders. The search queries and orders you use when using our website.

Textual, input and handwritten data. Textual, input and handwritten data and related information.

Location data. Data, which may or may not be precise, about the location of your device. For example, it is possible to collect location data from a device's IP address, or from data in your account profile that indicates with less precision where you are, such as the name of a city or a postal code.

Other data. Other data provided when you use our website, including data from Google Analytics.

6. Data processing purposes:

Improving products and/or services. We use data to improve our products and services, as well as to provide you with rich and relevant experiences.

Personalization. Some products include specifications, such as requirements that optimize your experiences and satisfaction. These features use automated processes to tailor your experiences based on the data we have about you, such as inferences we make about you and your use of the product, your activities, your interests, your location.

Product and/or service development. We use data to develop new products and services. For example, we

8.2-F15 Rev.0 Page 2 sur 5

use anonymized or pseudonymized personal information to better understand our customers' needs.

Customer support. We use data to diagnose and resolve problems with products and/or services, restore access to your personal account, and provide other support and assistance services.

To help secure and resolve problems. We use data to help secure and resolve problems with our products and services. This includes using data to ensure the security of services offered to our customers, detecting malware and malicious activity, resolving performance and compatibility issues to help customers get the most out of their experience and informing them of updates to our products and services. This may include the use of automated systems to detect security problems.

Security. We use data to protect the security of our products and customers. Our security features may include preventing malware from running, notifying users when malware is detected on their device, or using video surveillance.

Surveys and promotional communications. We use the data we collect to provide surveys and promotional communications. You can sign up for e-mail subscriptions, respond to surveys and choose whether or not to receive promotional communications from VESTSHELL by e-mail, SMS, post and telephone. For more information on how we manage your contact information, e-mail subscriptions and promotional communications, please see the Access and Control of Your Personal Information section of this Policy.

Relevant offers. VESTSHELL uses data to provide you with relevant and important information about the products and services we offer. We analyze data from different sources to predict what information will be most interesting and relevant to you and communicate it to you in different ways. For example, we can predict your interests in precision steel casting and offer you content that might appeal to you.

Advertising. VESTSHELL may use data collected through interactions with you, some of our products and on third-party websites to advertise our products and services, including on third-party websites. We may sometimes use automated processes to make advertisements more relevant.

Reporting and business operations. We use data to analyze our operations and improve decision-making. This enables us to make informed decisions and create reports on the performance of our activities.

Protection of rights and property. We use data to detect and prevent fraud, resolve disputes, enforce contracts and protect our intellectual property. For

example, we use data to combat fraud. We may use automated processes to detect and prevent activities that violate our rights and those of third parties.

Legal compliance. We process data to comply with the law. We also process contact details and identifiers to help customers exercise their data protection rights.

Research. We use data to carry out research, particularly for scientific purposes and in the public interest, where permitted by law.

7. Processing methods used

VESTSHELL attaches the utmost importance to the security of your personal information and undertakes to process it in accordance with industry norms and standards, solely for the purposes for which it is collected as described in this policy or in a specific notice to that effect. However, given the inherent security limitations of transmission via the Internet, it is impossible to safeguard your personal information absolutely. Information transmitted to us is therefore ultimately at the user's own risk.

8. Access to and control of personal information

VESTSHELL ensures that all personal information in its possession is as accurate, current and complete as is necessary for the purposes for which it is to be used.

You have the right to request access to your personal information for verification purposes and to request a correction if your personal information is inaccurate. If you believe that your personal information is inaccurate, or if you wish to access your personal information, you may make a request using the contact information provided at the end of this Policy.

To the best of our ability, we will provide you with timely access to your personal information. However, for security reasons, we may need to verify your identity.

In addition, there may be circumstances where we will not be able to provide you with access to your personal information. In particular, when access may lead to the disclosure of another person's personal information and that person refuses to consent to its disclosure, or when legal restrictions apply. Should such a situation arise, we will advise you of the reason why we cannot provide you with access to your personal information.

If your request concerns data appearing on third-party web pages or platforms, please contact these third parties directly.

Sharing and reason for sharing personal information with third parties

8.2-F15 Rev.0 Page 3 sur 5

We do not share your personal information with companies, organizations, or individuals outside of VESTSHELL, with the exception of our authorized suppliers and partners who need access to the information for the purposes listed in this policy and within the limits of this policy, as well as in the following cases:

With your consent.

For storage on cloud servers, in which case personal information may be transferred to third-party jurisdictions. Please note that we only retain the services of reputable companies with privacy policies.

For external processing purposes: We transfer personal information to other trusted companies or individuals who process it on our behalf, according to our instructions, in compliance with this Privacy Policy, with a level of data security at least equivalent to our own, and in compliance with any other appropriate security and confidentiality measures.

In particular, we use the services of third-party suppliers to pool, clean and analyze data so that they can add value to it and develop tools for the benefit of the public or industry players. To this end, these suppliers process the information provided in the following way:

The data is first prepared, then classified so that it can be used.

From the prepared data, the supplier creates aggregate statistics containing general, non-personal information, sometimes combined with data from similar sources. This pooled data is then used to create global statistics.

These data are then enriched in two different ways. The first is enrichment using freely available third-party data, such as socio-demographic data. The second process is called inferential enrichment. Enrichment by inference consists, for example, in deducing from a visit to our site whether the individual concerned is male or female.

For legal reasons: We transmit personal information outside our company if access to it is necessary to comply with applicable laws and regulations.

VESTSHELL will not sell or rent your personal information to third parties.

10. Cookies and similar technologies

VESTSHELL may use cookies, web beacons, web beacons, web beacons, log files or other technologies to collect certain personal information about visitors to our website, and about recipients of our newsletters, invitations and other communications. Cookies are

pieces of information transmitted by the server to the browser during a visit to the website, which uniquely identify the current connection. This data may include information such as your Internet Protocol (IP) address, browser type, browser version, the pages of our site you visit, the time and date of your visit, the time spent on the site and other statistics.

In particular, cookies are used to retrieve session-related search history, to facilitate the user's online browsing experience. It is important to note that, depending on the settings you choose, activating the cookies option may allow other servers to install cookies on your system. You can set your browser to inform you of the presence of cookies, giving you the chance to decide whether or not to accept them.

Please note that our website may contain links or references to third party websites. This policy ceases to apply when you leave our website and VESTSHELL is not responsible for the collection or processing of personal information by these third parties or via these external sources.

11. Retention of personal information

VESTSHELL keeps the data collected for different periods, depending on its nature and its usefulness in offering our products and services. During the retention period, VESTSHELL takes physical and technical measures to ensure the security of data containing personal information.

The main places where personal information is stored are in cities where VESTSHELL has offices or facilities and in cities where VESTSHELL has servers containing data collected by VESTSHELL.

Personal information may be held outside the country in which you live, if a third-party supplier or other entity to whom we disclose personal information in accordance with this Policy is located outside the country. In such cases, personal information may be subject to the local laws of the countries or territories in which the information is collected, used, disclosed or stored, and may be accessible to the governmental and law enforcement authorities of those countries or territories.

Once the retention period has expired, personal information is destroyed. Only statistics or reports containing de-identified and anonymized data may be retained for extended periods.

Other information

Changes to these rules:

We make changes to this Privacy Policy from time to time. Any reduction in your rights under this Privacy Policy will not be implemented without your express

8.2-F15 Rev.0 Page 4 sur 5

consent. We will always indicate the date on which the latest changes were made and allow you to access <u>archived versions</u> for review. If the changes are significant, we will publish a prominent notice on our website.

Person in charge of compliance:

If you have any questions, comments or complaints about this policy, you may contact the person responsible for ensuring compliance with this privacy policy:

Sylvain Blais VESTSHELL inc. 10378 Pelletier Av., Montreal QC H1H 3R3 Telephone: 514 326-1280 Fax number.: 514 326-6140

E-mail: sylvain.blais@vestshell.com

8.2-F15 Rev.0 Page 5 sur 5