



PRIVACY POLICY

Effective March 2024

1. POLICY

This Privacy Policy (the “Policy”) applies to the use, collection and disclosure of personal information of third parties in Canada by the Six Nations of the Grand River Development Corporation (SNGRDC), its operating divisions, subsidiaries and sponsored joint ventures (collectively referred to as “SNGRDC”, “we”, “us” or “our”). This Policy does not apply to information about our employees or to information that is not personal information. Employees seeking information regarding SNGRDC’s Employee Policy should contact SNGRDC Human Resources.

The purpose of this Policy is to inform our clients and other individuals we deal with (referred herein as “you” or “your”) as to how we collect, use, disclose and protect your personal information. Personal information is information about an identifiable individual, as more particularly described under applicable privacy legislation.

2. PERSONAL INFORMATION WE COLLECT

SNGRDC and its agents and representatives may collect personal information in a number of circumstances in the course of SNGRDC’s business activities. Personal information we may collect includes:

- name, address, telephone number, and other contact information;
- personal information about candidates who have applied for a job opportunity within SNGRDC;
- personal information about employees of businesses we are considering acquiring, as part of our due diligence;
- personal information about employees of our subcontractors and suppliers;
- personal information which may be provided or referenced in an application for credit, as part of our due diligence or as may be otherwise provided;
- health and safety information relating to employees of subcontractors or agents including incident reports and logs, investigations by provincial workplace safety boards, litigation history and any forms required to be completed as part of SNGRDC’s health and safety compliance requirements; and



- such other information we may collect with your consent or as permitted or required by law.

3. USE OF PERSONAL INFORMATION

SNGRDC generally uses personal information for the following purposes:

- creating a database of individuals who have registered to receive information from us;
- as part of our due diligence, when considering whether to acquire certain businesses;
- managing our business, including client relations and ongoing communications with our shareholders;
- managing, administering, collecting or otherwise enforcing accounts;
- maintaining business records for reasonable periods, and generally managing and administering our business including defending and bringing legal actions;
- considering and reviewing applications for credit;
- meeting legal, regulatory, insurance, security and processing requirements; and
- otherwise with consent or as permitted or required by law.

4. DISCLOSURE OF YOUR PERSONAL INFORMATION

Although SNGRDC does not routinely disclose personal information, we may disclose personal information as necessary to manage and administer our business; to meet legal, regulatory, insurance, audit, and security requirements; and as otherwise with your consent or as permitted or required by law. In addition to the above, personal information may be disclosed to our affiliates, professional advisors, consultants, investigators and adjudicators for internal audit, management, billing or administrative purposes including defending and bringing legal actions.

Service Providers. SNGRDC may transfer personal information to outside agents or service providers that perform services on our behalf, for example data processing services, information technology services such as internet intrusion detection services, firewalls and interception of viruses and spam, data and backup tape managing and hosting or similar services.



Business Transactions. Personal information may be used by SNGRDC and disclosed to parties connected with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of SNGRDC or our business or assets, for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples permitting those parties to determine whether to proceed or continue with the transaction and fulfilling reporting, inspection or audit requirements or obligations to those parties. SNGRDC will abide by all laws with respect to personal information in a business transaction including, ensuring that organizations receiving personal information enter into an agreement: to use or disclose the information for the sole purpose of the business transaction, to protect such personal information, and to return or destroy the information if the transaction does not proceed. If the transaction is completed:

- (a) the parties will enter into an agreement to limit the use or disclosure of the personal information to the purposes for which it was originally collect, to protect it, and give effect to any withdrawals of consent;
- (b) SNGRDC shall ensure the personal information provided was necessary for carrying on the activity that was the object of the transaction; and
- (c) you will be notified that such personal information has been transferred to a new owner.

5. OUR WEBSITE

SNGRDC is committed to providing a website that respects your privacy. For the purposes of this Policy, the “SNGRDC website” means all the web pages related to the sndevcorp.ca site excluding any links to third party sites. The SNGRDC website may contain links to other sites and other websites may link to the SNGRDC website. We are not responsible for, and have no control over, the content or privacy policies, practices, or actions of the third parties that operate these websites. You should review the privacy policies of those websites and you should not assume that this Privacy Policy applies to those websites.

By using the SNGRDC website, your consent to the contents of this Privacy Policy. If you do not agree with it, do not use the SNGRDC website.

The only personal information SNGRDC collects through the SNGRDC website is the information voluntarily supplied by you if you contact SNGRDC through the website. SNGRDC does not use “cookies” to track how visitors may use the SNGRDC site. SNGRDC currently does not use or maintain server logs or web logs to collect and log incoming traffic to the SNGRDC site. Information collected through the SNGRDC website is not disclosed to anyone other than SNGRDC employees, consultants, or agents on a “need to know” basis only. We will not disclose any personally identifiable information about you to third parties



without your permission unless we are legally entitled or required to do so or if we believe that such action is necessary to protect and/or defend our rights, property or personal safety and those of our clients, customers, etc.

We caution that internet communications are vulnerable to interception, use, and/or alteration by person(s) other than the intended recipient. While SNGRDC has implemented certain safeguards to reduce this risk, internet transmissions to and from SNGRDC are still vulnerable. If you choose to communicate by the internet, you do so at your sole risk.

6. YOUR CONSENT

Consent to the collection, use and disclosure of personal information may be given in various ways. Consent can be express (for example, orally, electronically or on a form you may sign describing the intended uses and disclosures of personal information) or implied (for example, when you provide information necessary for a service you have requested). Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified or described in this Policy, if applicable, or otherwise at the time of collection.

Your consent to the collection, use and disclosure of your personal information is intended to be ongoing and continuous. You may withdraw your consent to our collection, use and disclosure of personal information at any time, subject to contractual and legal restrictions and reasonable notice. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide certain services.

SNGRDC collects, uses and discloses your personal information with your consent, except as permitted or required by law. We may be required or permitted under statute or regulation to collect, use or disclose personal information without your consent, for example to comply with a court order, to comply with local or federal regulations or a legally permitted inquiry by a government agency, or to collect a debt owed to us.

7. SECURITY & RISK OF HARM

We take reasonable steps to protect your personal information using physical, electronic and administrative security measures appropriate to the sensitivity of the information in our custody or control. However, we would caution you that providing personal information will always contain some risk. A data breach or other unintentional disclosure of personal information may result in significant harm. Significant harm resulting from such disclosure of your personal information may include bodily harm, humiliation, damage to reputation, loss of



employment, business or professional opportunities, financial loss, identity theft, negative effects on credit records and damage or loss to property.

8. ACCESS, CORRECTION AND CONTACTING US

SNGRDC may establish and maintain a file of your personal information for the purposes described above, which will be accessible at SNGRDC's registered head office at 2498 Chiefswood Road, Ohsweken, Ontario N0A 1M0. If you wish to request access to your personal information in our custody or control, or to request a correction to your personal information, or to request personal information be destroyed, you may write to the above address, attention to the Manager of Marketing. Your right to access or correct your personal information is subject to applicable legal restrictions, this policy, and your contractual obligations. We may take reasonable steps to verify your identity before granting access or making corrections. If you wish to make inquiries or complaints or have other concerns about our personal information practices, you may write to us as described above or e-mail the Manager of Marketing at marketing@sndevcorp.ca.

9. PRIVACY POLICY CHANGES

This Policy may be revised from time to time. If you are concerned about how your personal information is used, you should contact us as described above or checking at our website periodically at <https://www.sndevcorp.ca/privacy-policy> to obtain a current copy of this Policy. Your continued provision of Personal Information or use of our services following any changes to this Policy constitutes your acceptance of any such changes. This Policy is effective as of March 2024.