

George Weston Limited Privacy Policy

Effective Date: January 1, 2024

At George Weston Limited ("Weston", "we", "us", "our"), we respect your privacy and take great care in protecting the confidentiality and security of your personal information. The privacy of individuals connected with our business, including our customers, business partner representatives, contractors, employees, job applicants, and website visitors, is of great importance to us.

To protect your personal information, we have committed to the following principles:

- We will be transparent about how we handle your personal information and our privacy practices;
- We will protect your personal information and handle it responsibly; and
- We will be transparent about how you can help manage your privacy and information, so you can make informed decisions.

Below is the full Weston Privacy Policy for more information.

1. Scope and Application

This Privacy Policy (the "**Policy**") applies to any personal information that we may collect about you. This Policy describes what personal information we collect, how we use and share it with third parties, as well as the rights and choices you have with respect to your personal information.

In this Policy, the term "personal information" means information about an identifiable individual or that allows an individual to be identified.

This Policy does not apply to Weston's <u>operating businesses</u>, including Loblaw Companies Limited and Choice Properties Real Estate Investment Trust, which have their own privacy policies available on their respective websites.

2. Personal Information we Collect and How we Collect it

The collection of personal information by us will be limited to that which is necessary for the purposes identified in this Policy. At all times, we will collect personal information by fair and lawful means.

We may collect the following categories of personal information about you:

Your name and contact information, such as your email address, home address
and phone number. We may collect this information in various situations, for
instance if you contact us with an inquiry, apply for a position with Weston or
otherwise interact with us as part of your role or duties as a business partner
representative. We generally collect this information directly from you, but in
certain cases we may receive it from third parties.



- **Professional or employment-related information**, such as information about your work experience and education. We collect this information if you apply for a position with Weston, including through the "Careers" page of our website. We will collect the personal information contained in your application package or generated in relation to your application in order to evaluate your application and assess whether to offer you a position. We may also collect personal information from third parties as part of a pre-employment reference check or background check
- Browsing activity or other electronic network activity information, such as IP addresses, page viewed on our website or language preferences. We generally collect this information when you visit our website using cookies or similar technologies. Cookies are small text files that are saved on your computer or mobile device when you visit a website so that information can be saved between visits, such as the geographic region you are accessing our websites from. Please refer to your browser instructions or help screen to learn more about how to block, delete and manage cookies on your computer or mobile device. We treat this information as "personal information" if it can identify you as an individual.

3. How we use personal information

The purposes for which personal information is collected are identified in this Policy. We may use personal information in the following ways for the administration and management of our business, or otherwise with your consent or as required or permitted by law:

- Operational purposes. We may use personal information when necessary to manage our business. For instance, this could include exercising due diligence to prevent or reduce commercial risk, ensuring the security of our business (including our information, system, network and website), preventing fraud or managing legal claims.
- **Communicating with you.** We may use your personal information to communicate with you in a variety of situations. For instance, we may contact you to respond to your inquiries.
- **Processing your job applications.** If you apply for a position at Weston, we will use your personal information as necessary to process and evaluate your application.
- **Conducting data analytics.** We analyze browsing behaviour on our website. This information is not provided to us in a personally identifiable format and is collected through ad settings on visitor devices or browsers.

4. How we share your personal information

We may share personal information with the following categories of third parties, or otherwise with your consent or as required or permitted by law:

 Our operating businesses. We may share personal information with our operating businesses when necessary to achieve the purposes described in this Policy. For instance, this may be necessary to allow Weston and our operating businesses to comply with applicable laws, to manage their operations or to process a job application.



• **Service providers.** We may share personal information with organizations that provide services to Weston, such as data hosting or email deployment. We require these service providers to limit their access to and/or use of personal information to what is required to provide their services and to comply with our privacy requirements.

5. How we Manage Consent

When you provide personal information to us, we assume that you consent to the collection, use and disclosure of your personal information as outlined to you at the time of collection, as applicable, or thereafter or as otherwise described in this Policy. In certain circumstances, we will seek consent after the information has been collected, particularly if Weston wants to use or disclose the information for a purpose not previously identified.

You may withdraw your consent at any time, except in limited circumstances, including legal or regulatory requirements or as a result of your contractual obligations with us. Withdrawal of consent may result in Weston becoming unable to provide or continue to provide the person with certain services, products or benefits, and the individual will be given notice of the implications of the withdrawal of his or her consent. To withdraw your consent, please contact our Privacy Officer as set out in the "Contact Us" section below.

6. How we Safeguard Personal Information

In order to protect personal information, Weston will employ administrative, technical and physical safeguards that are appropriate to the sensitivity of the information. These safeguards are meant to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held.

7. Where we Keep Personal Information

Some of our service providers may access, process or store personal information outside of your province, state, territory or country in the course of providing their services to Weston. In that case, the personal information is subject to the law of the jurisdiction in which it is used or stored, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

8. How Long we Keep Personal Information

We will store your personal information for as long as necessary to fulfill the purposes for which it was collected, except where otherwise required or permitted by law, or in accordance with our data retention procedures. Once no longer required, your personal information will not be used.



9. Accessing and Correcting your Personal Information

You have the right to access the personal information we hold about you, subject to any legal restrictions. Upon request, we will provide you with access to your personal information within a reasonable timeframe, in compliance with applicable laws. It is your responsibility to provide accurate, correct and complete information. If you notice any errors in your personal information or need to update it, you may ask for its correction.

You can request exercise your access and correction rights by contacting our Privacy Officer as set out in the "Contact Us" section below.

10. Changes to this Policy

We may make changes to this Policy from time to time. Any changes we make will become effective when we post a modified version of the Policy on this webpage. If we make any significant changes to the Policy, we will post a notice on our website or provide a more prominent notice if required by law. The "Effective Date" at the top of the Policy indicates when it was last updated.

11. Contact Us

If you have questions about how we handle your personal information, please contact the Weston Privacy Officer at:

- By mail: 22 St. Clair Avenue East, Suite 700, Toronto, Ontario M4T 2S5
- By e-mail: Weston.privacy@weston.ca.