

Effective date: September 2023

GFL Financing Solutions ("**GFL**") wants you to be aware of our privacy practices. This Privacy Policy ("**Policy**") is designed to help you understand how we collect, use, process and share your personal information when you interact with us, visit our websites ("**Site**") or participate in any other online services we offer (collectively the "**Services**"), and to help you understand and exercise your right to privacy.

PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services and the requirements of applicable law. We collect information that you provide to us, information that we obtain automatically when you use our Services and information from other sources such as third-party services and companies, as set out below.

Personal information you provide directly to us

We may collect personal information that you provide to us in a variety of ways, for example:

- **Request for Quotation.** We may collect personal information when you request a quote for our Services. The information we may collect includes personal information such as name, title, e-mail address, telephone number and/or cell phone number.
- **Application for financing.** We may collect personal information when you apply for financing. The information we may collect includes personal information such as name, title, e-mail address, telephone and/or cell phone number, home address, social insurance number, date of birth, banking information (address, account numbers, statements), personal balance sheet (assets and liabilities), driver's license number, proof of insurance and/or any other relevant information that may enable us to evaluate your application.

- **Your communications with us.** We may collect personal information, such as your name, e-mail address, telephone number or mailing address when you request information about our Services, sign up for our newsletter, request customer support, or otherwise communicate with us via e-mail, SMS, chat, or voice calls with our customer service personnel.
- **Surveys.** We may contact you to participate in surveys. If you agree to participate, we may collect personal information from you in connection with the survey.
- **Chat and other interactive features.** We may collect personal information that you submit or make available via interactive features such as messaging and chat features, or commenting features, forums, blogs and social networking pages. Any information you provide using the public sharing features of the Services will be considered "public," except as otherwise provided by applicable law, and is not subject to the privacy protections set forth herein.
- **Promotional activities.** We may collect the personal information you provide to participate in promotions we offer from time to time, such as sweepstakes and contests. In some jurisdictions, we are required to publicly release the identity information of contest and sweepstakes winners.
- **Conferences, trade shows and other events.** We may collect personal information from individuals who choose to provide it to us through participation in conferences, trade shows or other events.
- **Business development and strategic partnerships.** We may collect personal information from individuals and third parties in order to evaluate and pursue business opportunities.
- **Employment applications and recruitment.** If you apply for employment with GFL or apply to be an independent associate partner, we may collect information that will be used to evaluate your skills, qualifications and interest to determine compatibility with career opportunities with us, and to communicate with you regarding the status of your application. If you are offered and accept a position with our company or as an associate partner, your application data may be placed in your employee/associate partner file. Details of how we handle your personal information as a candidate or employee are explained in the notice applicable to candidates and employees provided to you, unless this notice is posted at the time your personal information is collected.

Personal information collected automatically

We may automatically collect personal information when you use our Services.

- **Automatic collection of personal information.** We may automatically collect certain information when you use our Services, including your IP (Internet Protocol) address, user settings, MAC address, cookie identifiers, wireless service provider, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location based on IP address), and Internet service provider. We may also automatically collect information about your use of our Services, such as the pages you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities and other information about how you use our Services.
- **Cookies (and other technologies) policy.** We may use *cookies*, web beacons and other technologies ("**Technologies**") to automatically collect information through your use of our Services.
 - **Cookies.** Cookies are small text files placed in browsers to store preferences and facilitate and enhance your experience.
 - **Spy pixels.** A web beacon is a code embedded in our Services that collects information about your engagement with our Services. The use of a web beacon allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also embed web beacons in e-mail messages to determine whether the message has been opened, forwarded or tracked.
- **Technology categories.** Our use of these Technologies falls into the following general categories:
 - **Strictly necessary.** This includes Technologies that allow you to access our Services, our applications and our tools that are necessary to identify irregular behavior on websites, to prevent fraudulent activities, to improve security, or that allow you to use the functionalities that we make available to you through our Site or Services.
 - **Performance-related.** We may use Technologies to evaluate the performance of our Services, including as part of our analytical practices to help us understand how individuals use our Services. We share privacy information for some of the Performance-Related Technologies we use. For example, we use *Google Analytics*. You can view the [Google Analytics](#) notice to better understand how Google uses your personal information (including for its own purposes, e.g., profiling or linking to other data). To find out how to disable the use of your personal information by Google Analytics, please click [here](#).
 - **Related to functionality.** We may use Technologies that allow us to provide you with enhanced functionality when you access or use our

Services. This may include identifying when you log in to our Services or tracking your preferences, interests, or the items you have viewed.

- **Related to targeting.** We may use internal Technologies or third-party Technologies, including cross-device tracking, to offer content, including advertisements linked to your interests, on our Services or on third-party digital properties.
- **Social media platforms.** Our Services may contain social media buttons that may include widgets such as the "share this" button or other interactive mini-programs. These features may collect personal information such as your IP address, the page you are viewing within our Services, and may set a cookie to ensure the proper functioning of the feature. Your interactions with these platforms are governed by the privacy policies and terms and conditions of the social media companies that provide them.

Personal information collected from other sources

We may obtain personal information about you from other sources, including third-party services. For example, if you access our Services through a third-party application, third-party login service, or social networking site, we may collect personal information about you from a third-party application that you have made accessible in your privacy settings.

HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information to provide our Services, for administrative purposes and to market our products and Services, as described below.

Providing our Services

We use our information to fulfill our obligations with you and to provide our Services, including:

- Manage your information and account;
- Provide access to our financing brokerage services;
- Respond to customer support requests;
- Communicate with you about your account and your activities in connection with our Services or other promotional offers;
- Contact you regarding changes to other policies;
- Process and complete your transactions.

Administrative and legal purposes

We use your information for a variety of administrative purposes:

- To serve our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Interact with you if you communicate with us as a supplier or on behalf of another company;
- Detect security incidents, protect against malicious, deceptive, fraudulent or illegal activities, and bring to justice those responsible for such activities;
- Measure interest and commitment to our Services;
- Short-term, transitory use, such as contextual ad personalization;
- Improve or enhance our Services;
- Develop new products and services;
- Ensure internal quality and safety control;
- Authenticate and verify individual identities, including requests to exercise your rights under this Policy;
- Audit of interactions, transactions and other compliance activities;
- Share personal information with third parties, if necessary, in order to offer you the Services;
- Implement agreements and policies;
- To carry out activities that are necessary to comply with our legal obligations;
- For legitimate commercial purposes, as permitted by law.

Marketing and advertising services

We may use your personal information to tailor your experience with our Services and to provide you with content and advertising as permitted by applicable law. Some marketing methods may include e-mail campaigns, text messages, targeted advertising and "personalized advertising," including cross-device tracking.

If you have any questions about our marketing practices or wish to opt-out of the use of your personal information for marketing purposes, you can learn more about your choices in the "YOUR PRIVACY CHOICES AND RIGHTS" section of this Policy, or you can contact us.

With your consent

We may use your personal information for other purposes that are clearly disclosed to you at the time you provide your personal information or with your consent, for example, when we require a personal guarantee to secure financing.

Other purposes

We also use your personal information for other purposes, as requested by you or as permitted by applicable law, or to create anonymized or aggregated information. If we create or receive anonymized information, we will not attempt to re-personalize it, except to comply with applicable law.

HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect ourselves or others, or in the event of a major business transaction such as a merger, sale or transfer of assets, as described below.

Disclosures to provide our Services

The categories of third parties with whom we may share your personal information are described below.

- **Service providers.** We may share your personal information with our service providers and third-party suppliers who assist us in providing our services. This includes service providers and suppliers who provide us with IT support, hosting, payment processing, chat and other customer service functions, and related services.

- **Business partners.** We may share your personal information with business partners, such as financial institutions, to provide you with the Services you have requested.
- **Advertising partners.** Through our Services, we may share your personal information with third-party advertising partners. These third-party advertising partners may implement Technologies and other tracking tools for our Services to collect information about your activities and device (e.g., your IP address, cookie identifiers, page(s) viewed, location, time of day). These advertising partners may use this information (and similar information collected from other services) to deliver personalized advertisements when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising", "cross-context behavioral advertising" or "personalized advertising". The categories of data we may share and may have shared for the purpose of delivering cross-contextual advertising and targeted advertising include: online identifiers such as IP address, device identifiers and characteristics; Internet or other electronic network activity, such as browsing and usage information; and interference about individual preferences, characteristics and behaviors.

We may also use your information with third parties where appropriate and permitted by law. The choices you may have regarding the protection of your personal information are determined by applicable law and are described in the "YOUR PRIVACY CHOICES AND RIGHTS" section of this notice.

Disclosures to protect our company or others

We may access, preserve and disclose to third parties any information we maintain about you if, in good faith, we believe it is necessary or appropriate to do so in order to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your rights or those of others, your property or your safety; enforce our policies or agreements; collect monies owed to us; or cooperate with an investigation or prosecution of suspected or actual illegal activity.

Disclosure in the event of merger, sale or other transfer of assets

If we are involved in a merger, acquisition, financial due diligence, reorganization, bankruptcy, receivership, asset purchase or sale, or transition of service to another provider, your information may be sold or transferred as part of such transaction, as permitted by law and/or contract.

YOUR PRIVACY RIGHTS AND CHOICES

Your privacy rights and choices. The privacy choices you may have regarding your personal information are determined by applicable law and are described below.

- **Email communications.** If you receive an unsolicited email from us, you may use the unsubscribe link at the bottom of the email to stop receiving emails. Please note that you will continue to receive transaction-related emails regarding the Services you have requested. We may also send you certain non-promotional communications about us and our Services, and you will not be able to unsubscribe from these communications (e.g., communications about our Services or updates to our Terms of Service or other legal notices).
- **Text messages.** If you receive an unsolicited text message from us, you may opt-out of receiving these text messages by following the instructions in the text message you received from us or by Contacting us.
- **Live chat.** If you visit our site, you can request customer service using a live chat function. Chats are user-initiated and session-based, and you can interrupt a chat you initiate at any time.
- **Telephone calls.** If you receive an unsolicited call from us, you may choose not to receive any further calls from us by following the instructions that may be offered to you during the call or by Contacting us.
- **"Do not track me.** *Do not track me* is a privacy setting that users can select in some web browsers. Please note that we do not honor *Do Not Track Me* signals or similar mechanisms transmitted by web browsers.
- **Cookies and personalized advertising.** You may stop or limit the placement of certain Technologies on your device or remove them by setting your preferences through the cookie banner of the website you are visiting, or as otherwise enabled by your device. However, if you set your preferences, our Services may not function properly.
- **Request to know.** You may have the right to request that we disclose certain information about our collection, use and disclosure of your personal information. Once we have received and confirmed your verifiable request, we will disclose to you some or all of the following, depending on your request: the specific elements of personal information we have collected about you; the categories of sources from which we collect personal information about you; the categories of personal information we have disclosed about you for business purposes; the categories of third parties to whom we have disclosed your personal information for business purposes; and the business purposes for which we collect personal information.
- **Request for deletion.** You have the right to request that we delete certain of your personal information that we have collected from you and retained, subject to certain exceptions. Once we have received and confirmed your request, we will delete (and direct our service providers to delete, if applicable) your personal information from our records, unless an exception applies.

- **Request that** your personal information be corrected if it is inaccurate or incomplete.
- **Request to restrict or withdraw** our processing of your personal information where the processing of your personal information involves the processing or sharing of your sensitive personal information for certain purposes, or the processing of your personal information for profiling purposes in connection with decisions that have significant legal or other effects on you.
- **Withdrawal of consent** to our processing of your personal information. Please note that your withdrawal will only be effective for future processing and will not affect the lawfulness of processing prior to withdrawal.
- **No discrimination.** You have the right not to receive discriminatory treatment from us for exercising any right to confidentiality conferred by applicable laws.

CONTACT US / YOUR PRIVACY RIGHTS

If you have any questions about our privacy practices, or to exercise your rights under this Policy, you may contact us in one of the following ways:

- Submit a request online: www.gfl.ca
- E-mail: administration@gfl.ca
- Phone: 1-514-937-7244
- Manager: Marie-Claude Guilmette

We will process requests in accordance with applicable laws.

- **Verification methods.** Once a request has been submitted, we will verify that you are the consumer to whom the request applies by comparing the identifying information you have provided (e.g., name, e-mail address, account information) with the information we have on file. Depending on the type of request you submit, we will attempt to compare two or three of the data points you have provided. If we are unable to verify your request against the data points you have provided, we may contact you to obtain additional information to verify your request.
- **Appeal.** You have the right to appeal our decision or response to your request. To exercise your right to appeal, you may submit a request for appeal in the same manner in which you submitted your original request, including by contacting us as set out in this Policy.

SECURITY OF YOUR INFORMATION

We take reasonable steps to ensure that your information is treated securely and in accordance with this Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we cannot assume responsibility for unauthorized access, use, disclosure or loss of your personal information.

By using our Services or providing us with your personal information, you agree that we may communicate with you electronically regarding security, privacy and administrative issues relating to the use of our Services. If we become aware of a breach of system security, we may attempt to notify you electronically by posting a notice on our Services, by mail or by e-mail.

RETENTION OF PERSONAL INFORMATION

We retain the personal information we collect, as described in this Policy, for as long as you use our Services, or as necessary for the purposes for which it was collected, to provide our Services, resolve disputes, establish a legal defense, conduct audits, pursue legitimate business objectives, fulfill our agreements and comply with applicable laws. In addition, we undertake to retain all such personal information in accordance with legal requirements.

OTHER PROVISIONS

Third-party websites and applications. The Services may contain links to other websites/applications, and other websites/applications may contain links to or reference our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, control or assume any responsibility for the privacy practices or content of other websites and applications. You agree that if you choose to provide personal information to third-party websites or applications encountered on our Sites or through our Services, you do so at your own risk.

INTERNATIONAL DATA TRANSFERS

Any information we process may be transferred, processed or stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws in force where you live. We are committed to protecting your information in accordance with the requirements of applicable laws; however, please note that your personal information may be accessible to U.S. courts and law enforcement and national security authorities.

Files and records containing your personal information that are subject to applicable Canadian data protection laws will be kept in our offices and/or servers or those of our service providers, and only those employees who need them to perform their duties will have access to these files.

CHANGES TO OUR POLICY

We may, in our sole discretion, revise this Policy from time to time. If material changes are made to this Policy, we will notify you as required by applicable law. You are deemed to have accepted the updated Policy if you continue to use our Services after a new Policy takes effect.