

GROUPE DYNAMITE INC.

(THE "CORPORATION")

PRIVACY POLICY

Privacy Policy September 2024

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1. Purpose

This Privacy Policy is intended to provide you with information on how Groupe Dynamite Inc. ("Groupe Dynamite Inc.", "we", "us" or "our") collect, use, disclose, and protect your personal information when you use our services. This policy applies to all interactions you may have with our website and any other services we provide.

This Privacy Policy also contains information on your rights regarding your personal information, and how you can exercise them. If you have any question on how we handle your personal information of if you want to exercise your privacy rights, you can reach out to our Privacy Officer at any time:

Privacy Officer
Groupe Dynamite Inc.
5592 Ferrier St, Mount Royal, Quebec H4P 1M2
Email: privacy@dynamite.ca

2. What is the Scope of this Privacy Policy?

This Privacy Policy covers our services including:

- Our websites and other digital properties that link to this Privacy Policy;
- Our brick-and-mortar retail stores;
- Orders that we fulfill for our partners;
- Our surveys and other consumer research activities;
- Our promotions, sweepstakes, and contests;
- Our marketing activities, including when you sign up for our newsletters;
- Our Groupe Dynamite Inc. Concierge service; and
- Our social media accounts.
- We refer to our activities described above collectively as the "Services".

Our website may contain hyperlinks to services or applications, including social network sharing widgets. We provide these hyperlinks for convenience and have no control over the privacy and confidentiality practices of third-party sites. Thus, any personal information shared via these sites is not covered by this Privacy Policy but is subject to their own privacy policy. It is your responsibility to become familiar with these policies to protect your personal information.

3. What is Personal Information?

A Personal information means any information that, either on its own or when combined with other information, can be used to identify a natural personal, either directly or indirectly. Some of the information that we consider as person



information for the purpose of this Privacy Policy may not be protected under applicable laws of other jurisdictions, and you may not be entitled to the same rights regarding such personal information

4. Your Consent

When you provide Groupe Dynamite Inc. with your personal information, you consent to Groupe Dynamite Inc.'s collection, use, disclosure, and retention of your information in accordance with this Privacy Policy and as otherwise permitted by law.

5. What Personal Information Does Groupe Dynamite Inc. Collect?

Information You Provide to Us. Personal information you may provide to us through the Service or otherwise includes:

- Contact Data, such as your first and last name, email address, billing and mailing addresses, and phone number when you purchase products or services from us (including at Groupe Dynamite Inc retail store or through Groupe Dynamite Inc website), contact us through Groupe Dynamite Inc Customer Service, or when you create an online account with us.
- **Profile Data**, such as your username and password that you set to establish an online account with us, age, date of birth, gender, biographical details, photos, links to your profiles on various third-party sites including social networks, interests, preferences, and information about your participation in our events, promotions, sweepstakes, contests, or surveys.
- Communications that we exchange or you share or publish, including when you communicate with us with questions, feedback, or otherwise, including through Groupe Dynamite Inc Customer Service, our client support team, and on social media, such as through direct messages or public posts. We may record our conversations, including telephone conversations. When you call us, we may use machine learning tools to help us understand if your experience is positive or not.
- Research Data that you provide when you agree to participate in our surveys or research activities (including the Research Community), such as your survey responses, profession, interviews, workshops, and audio and/or video that we record about you or captures of your device's screen in relation to such surveys and research activities.
- Payments and Transactional Data , such as the information needed to complete your orders on or through
 the Service (including name, credit card information, bank account number, billing and shipping information),
 and your purchase history.



- Marketing Data , such as your preferences for receiving communications about our products, services, events, promotions and newsletters and similar messages, and details about how you engage with our communications.
- Job Application Data, such as professional credentials and skills, educational and work history, LinkedIn profile
 page, personal website, authorization to work in Canada, immigration status, criminal history, and other
 information that may be included on a resume or curriculum vitae as well as in a cover letter. This may also
 include diversity information that you voluntarily provide.
- Other Information that we may collect which is not specifically listed here which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-Party Sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- Public Sources, such as social media platforms, publications, and news sites.
- **Business and Marketing Partners** , such as marketplaces including Instagram, joint marketing partners, and event co-sponsors.
- Data Providers , such as information services and data licensors that provide demographic and other information about our users.
- Users of the Service, who can purchase products or services (including gift cards) for others, share a product or article with others, refer a friend, or otherwise share contact information of others with us.
- Third-Party Platforms, such as social media accounts such as Facebook, that you use and choose to connect to the Service. This data may include your username, profile picture and other information associated with your account on that third-party service that is made available to us based on your account settings on that service.

Automatic Data Collection . We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your activity over time on our sites and other sites and online services, such as:

• **Device Data**, such as your computer or mobile device operating system type and version number, manufacturer and model, browser type, screen resolution, IP address, unique identifiers, the website you visited before browsing to our website, and general location information such as city, province or geographic area.



- Online Activity Data , such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- Security Camera Footage and Photos from our stores and offices.

Information About Others . We may also collect information about you from others who know you like your family or friends such as when they want to ship a product (including gift cards) to your address. For example, to send the package, we'd need them to tell us your name, email, mailing and shipping addresses. We may also collect information about you from family or friends if they send you a link to a product or article on the Groupe Dynamite Inc. website. If you provide us with information about your family or friends, please make sure you have their consent to and remind them to review our Privacy Policy which describes how we use their information.

6. Cookies and Similar Technologies

Groupe Dynamite Inc.'s websites, online services, email messages, and advertisements may use "cookies" and other similar technologies, such as web beacons, pixel or gif tags, and action tags. Those technologies collect information that assists Groupe Dynamite Inc. to improve products and services, advertising, customer communications and the shopping experience.

Types of Cookies	Description
Necessary	Necessary cookies that are essential for a website to function correctly, example: properly login and create an account.
Analytics	Analytics cookies help collect data that allows services to understand how you interact with a particular service.
Functional	Functional cookies help you as a website owner to personalize your end -users browsing experience.
Performance	Performance cookies are cookies used specifically for gathering data on how visitors use a website, which pages of a website are visited most often, or if they get error messages on web pages.
Advertisement	Targeting and advertising cookies are specifically designed to gather information from you on your device to display advertisements to you based on relevant topics that interest you.

For example, Groupe Dynamite Inc. may use information collected through cookies and similar technologies to recognize the user of Groupe Dynamite Inc.'s websites and supplement our profile for that user, determine a user's general location to tailor the website content to that user's location, track use of the websites, offer personalized web page content, information, and advertisements, and otherwise facilitate and improve the website experience. You may



choose to decline or disable cookies if your web browser permits, but doing so may affect your ability to access or use certain features of Groupe Dynamite Inc.'s websites. For more information on how to disable cookies, see Section 7.

Groupe Dynamite Inc. may use web beacons, pixel or gif tags, and action tags to confirm that email messages have been delivered and opened. You may opt -out of receiving emails in accordance with this Privacy Policy.

7. How can you manage your cookie preferences?

You can manage your cookie preferences through your browser, by uninstalling and blocking certain cookies. Click on your browser below to obtain instructions. You can withdraw your consent on the use of cookies at any time by managing your preferences. Certain features may require cookies for security purposes. Do Not Track Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find o ut more about "Do Not Track," please visit https://allaboutdnt.com/.

8. How Groupe Dynamite Inc. Uses Your Personal Information

We use your personal information for the following purposes or as otherwise described at the time we collect it:

To Provide Services . We use your personal information to:

- Provide, operate and improve the Service and our business;
- Establish and maintain your user profile on the Service, including tracking your orders and shipments and sending you reminders of items left in your shopping cart;
- Remember devices from which you have previously logged in;
- Communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- Understand your needs and interests, and personalize your experience with the Service and our
 communications such as by using your location information to determine your language preferences or display
 accurate date and time information; and
- Provide support for the Service, respond to your requests, questions, and feedback, including through Groupe Dynamite Inc. Customer Service, evaluate your satisfaction with the Service and to otherwise administer our relationship with you.

We may combine your personal information collected through various sources, including information collected at Groupe Dynamite Inc.'s retail stores and through Groupe Dynamite Inc.'s websites, and information obtained from other sources such as to enhance and personalize your shopping experience on our websites and to facilitate product returns.



Research and Development. We may use your personal information for internal research and development purposes, including to analyze and improve the Service and our business. As part of these activities, we may create aggregated, de-identified data from personal information we coll ect. We make personal information into de -identified data by removing information that makes the data personally identifiable to you. We may use this de -identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business. For example, if we learn that most users use mobile devices, we might wish to expand on that feature.

Marketing and Advertising. We and our third -party advertising partners may collect and use your personal information for marketing and advertising purposes, except that such sharing with third parties does not include sharing of personal information collected through our short code text messaging programs without your consent:

- Direct Marketing. We may send you Groupe Dynamite Inc.-related or other direct marketing communications as permitted by law. You may opt out of our marketing communications as described in the Opt Out of Marketing Communications section.
- Interest -Based Advertising. We may contract with third-party advertising and social media companies to display ads on the Service and other online services. These companies may use cookies and similar technologies to collect information about you (including the device data, online activity data and/or geolocation data described above) and your interaction over time across the Service, other online services, and with our communications, and use that information to serve ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the Advertising Choices section.

Manage Recruiting and Process Employment Applications . We may use personal information, such as information submitted to us in a job application, to facilitate our recruitment activities and process employment applications, such as by evaluating a job candidate for an employment activity, and monitoring recruitment statistics.

Compliance and Protection . We may use your personal information to:

- Comply with applicable laws, lawful requests, and legal processes, such as to respond to subpoenas or requests from government authorities;
- Protect our, your, or others' rights, privacy, safety, security, or property (including by making and defending legal claims and security monitoring in our stores);
- Audit our internal processes for compliance with legal and contractual requirements and internal policies;
- Enforce the terms and conditions that govern the Service including our Terms of Use, and other legal terms and policies; and
- Prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft.



9. <u>Does Groupe Dynamite Inc. share personal information with third parties?</u>

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection:

Affiliates. Our corporate affiliates for the provision of our products and Services consistent with this Privacy Policy.

Suppliers and Service Providers . Companies and individuals that provide services on our behalf or help us operate the Service or our business (such as IT, hosting, payment processing services, customer relationship management and support, print and mail fulfillment, order fulfillment an d shipping, data/document storage and management, email delivery, marketing, analytics, fraud detection, event management services, promotions, sweepstakes, contests, and surveys).

Financial Services Companies . Companies that check your credit and offer financing for your purchases, such as Klarna, if you choose to use them. Klarna may use your information in accordance with its privacy policy,

Payment Processors . Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as PayPal. PayPal may use your payment data in accordance with its privacy policy, https://www.paypal.com/ca/webapp s/mpp/ua/privacy -full.

Advertising Partner . We may share your personal information with third-party advertising companies for the interest -based advertising purposes described above.

Professional Advisors . Professional advisors, such as lawyers, accountants, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and Others . Law enforcement, government authorities, courts, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

Business Transferees . Relevant participants in business transactions (or potential transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Groupe Dynamite Inc or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Business and Marketing Partners . Third parties with whom we co -sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.



Third-Party Platforms . If you choose to log in to the Service with, or otherwise link your Service account to a social media platform such as Facebook, we may share your personal information with that third -party service. The third party's use of the shared information will be governed by its privac y policy and the settings associated with your account with the third -party service.

10. What are your rights?

As a user of our services and according to privacy laws, you have several rights in relation to your personal information:

Right to Information and Access: You have the right to be informed about how we collect, use, and disclose your personal information. You also have the right to access the personal information we hold about you.

Right to Rectification: If you believe that any personal information, we hold about you is incorrect or incomplete, you have the right to request its correction.

Right to Data Portability: You may have the right to receive your personal information in a structured, commonly used, and machine-readable format, and you may have the right to transmit that data to another entity without hindrance from us.

Right to Object and Withdraw Consent: You have the right to object to the processing of your personal information under certain circumstances and to withdraw your consent to the processing of your personal information at any time.

Right to Non -Discrimination: You have the right not to be discriminated against for exercising your privacy rights.

Right to Lodge a Complaint: If you be lieve that we have processed your personal information in violation of applicable law, you have the right to lodge a complaint with a competent supervisory authority.

To exercise these rights, please contact our Privacy Officer (<u>privacy@dynamite.ca</u>). Please note that we may ask you to verify your identity before responding to such requests.

11. Your choices

You have the following choices with respect to your personal information:

Access or Update Your Information . If you have registered for an account with us, you may review and update certain account information by logging in to the account or communicating with our Privacy Officer if you have further concerns.



Consent and Marketing Communications . We will only collect, use, and disclose your personal information with your explicit consent. You have the right to give, refuse, or withdraw your consent at any time. Specifically, for marketing communications, we will only send you these communications if you explicitly opt in. You can do this when you create an account with us or by contacting us at customerservice@dynamiteclothing.com customerservice@garageclothing.com. If you later decide you no longer wish to receive these messages, you may opt out of marketing -related messages by using the applicable self -service unsubscribe procedure (for example, by clicking an unsubscribe link in an email, replying STOP to the sho rt code or telephone number from which text messages are being sent or adjusting your website user account preferences), or by contacting us at privacy@dynamite.ca or at 1 -833-747-8175. From time to time, Groupe Dynamite Inc. may use your personal information to communicate with you regarding important matters, such as information about your purchases or updates to Groupe Dynamite Inc.'s Privacy Policy or the Terms of Use that govern Groupe Dynamite Inc.'s websites. Given the information's important nature, it is not possible for you to opt -out of these communications.

Cookies and Tracking Technologies . You have control over your cookie and tracking preferences. Most browsers let you remove and/or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default un til you change your settings. If you do not accept cookies, however, you may not be able to use all functionality of the Service and it may not work properly. For more information about cookies, including how to see what co okies have been set on your browser and how to manage and delete them, visit https://allaboutcookies.org/. We use Google Analytics, including the Google signals feature, to help us understand user activity and patterns on the sites. You can learn more about Google Analytics cookies at https://developers.google.com/analytics/resources/concepts/gaConceptsCookie s and about how Google protects your data at https://www.google.com/analytics/learn/privacy.html. You can prevent the use of Google Analytics relating to your use of our sites by downloading and installing a browser plugin available at https://tools.google.com/dlpage/gaoptout?hl=en ...

Local Storage . You may be able to limit use of HTML5 cookies in your browser settings. Unlike other cookies, Flash - based local storage cannot be removed or rejected via your browser settings, but you can adjust the settings of your Flash player to block it. Blocking Fl ash storage may impede the functionality of Flash applications, including those employed by the Service. For more information on Flash local storage visit https://www.adobe.com/products/flashplayer/end -of-life.html .

You can also manage your cookie preferences (including for cookies relating to advertising) by visiting our Cookie Preference Center (Manage Cookies).

Advertising Choices . You can limit use of your information for interest -based advertising by:

- Browser Settings . Blocking third-party cookies in your browser settings.
- **Privacy Browsers/Plug** -Ins. By using privacy browsers or ad-blocking browser plug-ins that let you block tracking technologies.



- Platform Settings . Google and Facebook offer opt-out features that let you opt-out of use of your information for interest-based advertising:
 - Google: https://adssettings.google.com/
 - Facebook: https://www.facebook.com/about/ads
- Ad Industry Tools . Opting out of interest -based ads from companies participating in the following industry
 opt-out programs:
 - Network Advertising Initiative: https://thenai.org/opt -out/
 - Digital Advertising Alliance: https://optout.aboutads.info/?c=2&lang=EN
 - AppChoices mobile app, available at https://youradchoices.com/appchoices, which will allow you to opt of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- Mobile Settings . Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest -based advertising purposes.

Declining to Provide Information . We need to collect personal information to provide certain services, such as your address to ship a product. If you do not provide the information requested, we may not be able to provide those services.

Third-Party Platforms . If you choose to connect to the Service through your social media account such as Facebook, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

Please note that we also may work with companies that offer their own opt -out mechanisms or do not participate in the opt-out mechanisms described above. We have no control over those mechanisms and even after using these opt-out mechanisms, you may receive interest-based advertising from other companies.

12. <u>Social Networking, Other Sites and Services</u>

When you use certain aspects of Groupe Dynamite Inc.'s websites or other services, or post information to other social networking sites, for example, there may be links to Groupe Dynamite Inc.'s Facebook or Twitter pages or you may be able to "like" a product on your Facebook account or "Pin" a product on your Pinterest account, the information that you post or share in connection with these third-party sites is visible to other persons and can be read, collected, used, and disclosed by other persons, including to send unsolicited messages. In such cases, you will be leaving Groupe Dynamite Inc.'s website and going to the third party's website. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or other online services that are not associated with us. Any information you provide or post to such third-party social networking sites and other sites is governed by their own privacy policies, which you may read



on the applicable site. You are solely responsible for the information that you choose to post or share in those situations. Groupe Dynamite Inc. has no control over, or responsibility or liability for the use, disclosure, and retention of the information that you disclose in those situations, and the use, disclosure, and retention of the disclosed information is not subject to this Policy. Please be careful when disclosing your information in those situations.

13. Retention, Location and Security of Your Personal Information

Groupe Dynamite Inc. retains your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy or such longer retention period as may be required or permitted by applicable law.

Groupe Dynamite Inc. will store and process your personal information in Canada. We may also store some information in other regions for specific services or functionalities that may requires the transfer of personal information outside Quebec or Canada such as the United States, and other countries. When Groupe Dynamite Inc. must communicate PI outside Quebec, the privacy team performs privacy impact assessments (PIA) and use contractual agreements with our service providers to ensure PI protection is granted in other jurisdictions. The laws of other countries regarding the collection, use, disclosure, and retention of personal information may be different from the laws of Canada. The disclosure of your information in accordance with this Privacy Policy may result in your personal information being transferred outside of Canada.

Groupe Dynamite Inc. employs reasonable safeguards, including administrative, technical, and physical measures, appropriate to the sensitivity of the personal information in its possession or under its control in order to protect that information from unauthorized access, collection, use, disclosure, disposal, or similar risks. While Groupe Dynamite Inc. uses reasonable efforts to protect your information, no method of transmission over the Internet, or method of electronic storage, is 100% secure, and therefore, Groupe Dynamite Inc. cannot guarantee absolute security of your personal information.

14. International Data Transfer

We are a Canadian Corporation and your information submitted by you through our websites is collected and maintained in the United States, Canada, and other countries, regardless of the geographic location or country where the information originated. If you do not consent to your information being collected and maintained in the United States, Canada, and other countries, then you should not enter such information through our websites.

This website may be accessed by users in countries outside of Canada; however, this website is intended for use by individuals located in Canada only. We make no representations or warranties that dynamiteclothing.com is appropriate or available for use in countries outside of Canada (such as laws relating to default cookie settings).



15. Accuracy of Personal Information and Right to Access

You can help us maintain the accuracy and completeness of your information (including your dynamiteclothing.com website account information) by notifying us of any changes to your information. You may update your dynamiteclothing.com website account information through our websites, Groupe Dynamite Inc. Customer Service, or at a retail location. You may also submit a request to review, verify, or correct your personal information by contacting Groupe Dynamite Inc.'s customer service. We may request specific information from you to help us confirm your identity. We may refuse a request to access or correct if we believe the change is prohibited or not required by law or cause the information to be incorrect. In cases of a refusal, we will provide you an explanation of the reasons for the refusal.

16. Withdrawal of Consent

Where you have provided your consent to the collection, use, and disclosure of your personal information, you may have the legal right to withdraw your consent under certain circumstances. You can withdraw your consent, if applicable, by contacting Groupe Dynamite Inc.'s Privacy Officer. Please note that if you withdraw your consent, we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.

You may at any time ask Groupe Dynamite Inc. to delete your personal information by contacting a Privacy Officer by emailing privacy@dynamite.ca We will consider and where necessary comply with your request in accordance with applicable law.

17.Children

Groupe Dynamite Inc. does not knowingly collect personal information from children who are under 14 years of age without the consent of their legal guardian. Please immediately contact Groupe Dynamite Inc.'s Privacy Officer at one of the addresses noted below under Contacting Groupe Dynamite Inc.'s customer service if you believe that Groupe Dynamite Inc. has unintentionally collected personal information from a child under 14 years of age without the consent of their legal guardian. If Groupe Dynamite Inc. learns that it has inadvertently collected personal information from a child under 14 years of age without the consent of their legal guardian, Groupe Dynamite Inc. will use reasonable efforts to delete that information from its systems (except to the extent that retention of the personal information is required or permitted by applicable law).

18. Employment



Groupe Dynamite Inc. may use and disclose your personal information to administer and process your application for employment with Groupe Dynamite Inc. and related matters. If we hire you, this personal information will be used, disclosed, and retained in accordance with our Employee Privacy Policy.

19. <u>Changes to this Privacy Policy</u>

Groupe Dynamite Inc. may change this Privacy Policy from time to time, in which case we will notify you by posting a new version of this Privacy Policy on Groupe Dynamite Inc.'s website at Dynamiteclothing.com. In some cases, we may also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Service. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting).

20. <u>Contacting Groupe Dynamite Inc.'s Privacy Office</u>

Please let us know if you have any concerns or complaints about this Privacy Policy and how we process personal information by reaching out to our Privacy Officer. We will handle your complaint seriously and take required actions.

If you are still not satisfied, you can also contact your local regulator to understand how to make a complaint. If you are in Canada, you can reach out to the Office of the Privacy Commissioner. In Quebec, you can reach out to the Commission d'accès à l'information. If you are in the EU, you can find the list of data protection authorities here.

