

Vachon Privacy Statement

Vachon Bakery Inc. (“Vachon”, “we”, “us” or “our”) takes steps intended to meet the privacy principles and requirements with respect to personal information under the applicable Canadian privacy legislation. The purpose of this statement is to inform our customers and other individuals we deal with (“you” or “your”) regarding how we collect, use, disclose and protect your personal information both on and off-line. Personal information is information about an identifiable individual, as more particularly described under the applicable privacy legislation. This statement applies to our collection, use and disclosure of personal information in Canada. This statement does not apply to information about our employees nor to information that is not personal information.

Personal Information We Collect

Vachon, directly or through its agents and representatives, collects personal information in a number of circumstances in the course of its business. Vachon shall retain personal information only as long as necessary to fulfill the purposes for which it was collected. Vachon only collects personal information about you that is necessary for the purposes of establishing, managing and maintaining our relationship with you. Personal information we collect includes:

- contact information such as name, address, email address and telephone number;
- information provided when you register or otherwise provide information on our web site;
- information provided when you complete questionnaires or surveys;
- information provided when you participate in a promotion or contest;
- information provided otherwise such as by telephone, by mail or through our web site;
- records of customer calls or product-related comments or inquiries;
- such other information we may collect with your consent or as permitted or required by law.
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Use of Personal Information

Vachon generally uses personal information for the following purposes:

- receiving and replying to your requests, inquiries and comments;
- sending you information about products and promotions offered by Vachon and / or contacting you to conduct telephone surveys and market research;
- sending coupons from time to time;
- providing customer service;
- administering promotions and contests;
- creating a data base of individuals who have registered to receive information from us;
- understanding your preferences, needs and interests and offering you products and information that are likely to be of interest to you and personalizing your experience when visiting our web site such as by presenting you with information and offerings that we think will be of interest to you;
- improving our products;
- managing our business, including customer relations;
- ensuring the security of our business operations, including our web site;
- managing, administering, collecting or otherwise enforcing accounts;
- maintaining business records for the necessary periods and as required by law, and generally managing and administering our business, including defending and prosecuting legal claims;
- meeting legal, regulatory, insurance, security, accounting and processing requirements;
- other purposes disclosed at the time of collection of your personal information; and

- otherwise with your consent or as permitted or required by law.

Disclosure of Your Personal Information

Vachon recognizes that, except in the cases and under the conditions described hereinafter and as otherwise authorized or required by law, the communication of your personal information to a third party requires your consent.

According to the applicable legislation, for example, personal information about you may be communicated by Vachon, without your consent, to the following persons:

- to our legal counsel;
- to a person or body having the power to compel communication of the information if it is required in the exercise of his or its duties or functions including to comply with a subpoena, a warrant or rules of the Court pertaining to the production of documents;
- to a person or body responsible, by law, for the prevention, detection or repression of crime or statutory offences who require it in the performance of his or its duties and if the information is needed for the prosecution of an offence under applicable law;
- to a person to whom it is necessary to communicate the information under applicable law;
- to a person for collecting a debt owed to Vachon.

Service Providers. Vachon may transfer personal information to outside agents or service providers (including affiliates of Vachon acting in this capacity) that perform services on our behalf, for example data processing services such as mailing, call centre, billing, marketing, information technology or data hosting or similar services, or otherwise to collect, use, disclose, store or process personal information on our behalf for the purposes described in this Privacy Statement. Some of these service providers or affiliates may be located outside of Canada, including in the United States, and your personal information may be collected, used, disclosed, stored and processed in the United States or elsewhere outside of Canada for the purposes described in this Privacy Statement. Reasonable contractual or other measures we may take to protect your personal information while processed or handled by these service providers are subject to legal requirements in Canada, the United States and other foreign countries applicable to our affiliates, agents and service providers. For example we may be required to disclose personal information due to lawful requirements to disclose personal information to government authorities in those countries.

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Legal, Regulatory, etc. Vachon may disclose your personal information as necessary to meet legal, regulatory, industry self-regulatory, insurance, audit, and security requirements, with your consent or as permitted or required by law (including as required by applicable Canadian and foreign laws applicable to Vachon or our agents and service providers, and including lawful requirements to disclose personal information to government authorities in those countries).

Our Website/The Internet

Active Information Collection. Vachon's web site actively collects information from its visitors both by asking you specific questions and by permitting you to communicate directly with us via e-mail and/or feedback forms. Some of the information that you submit on the Web site may be personal information.

Passive Information Collection. As you navigate through Vachon's web site, certain anonymous information can be passively collected (that is, gathered without you actively providing the information) using various technologies, such as cookies, Internet tags or web beacons, and navigational data collection (log files, server logs, clickstream). Your Internet browser automatically transmits to the Web site some of this anonymous information, such as the URL of the Web site you just came from, the Internet Protocol (IP) address, time of visit, date of visit, the pages visited within the site, and the browser version your computer is currently using. Vachon's web site may also collect anonymous information from your computer through cookies and Internet tags or web beacons. You may set your browser to notify you when a cookie is sent or to refuse cookies altogether, but certain features of the Web site might not work without cookies.

The Vachon Web site may use and combine such passively collected anonymous information to provide better service to site visitors, customize the site based on your preferences, compile and analyze statistics and trends, and otherwise administer and improve the site for your use. Such passively collected anonymous information is not combined with personal information collected elsewhere on the Web site, unless you have consented to have your personal information collected in conjunction with this passive information.

Your Consent

Consent to the collection, communication or use of personal information must be manifest, free, and enlightened. It must be given for specific purposes. Such consent is valid only for the length of time needed to achieve the purposes for which it was requested. 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 personal information necessary for a service you have requested or the purpose is obvious). You may be asked to provide your specific consent in some special and specific circumstances where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose, such as by using an "opt out" option provided, if any. Unless required by law, Vachon shall not use or disclose, for any new purpose, your personal information that has been collected without first identifying the new purpose and obtaining your consent. Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney). **Generally, by providing us with personal information, you are deemed to consent to our collection, use and disclosure of such personal information for the purposes identified or described in this privacy statement, if applicable, or otherwise at the time of collection.**

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 of our products or services. Note also that where we have provided or are providing products or services to you, your consent will be valid for so long as necessary to fulfil the purposes described in this Privacy Statement or otherwise at the time of collection, and you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, but not limited to, maintaining reasonable business and transaction records, disclosures to Canadian and foreign government entities as required to comply with laws, and reporting on credit information after credit has been granted, if applicable).

Vachon 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.

Unsubscribing (Opting-out) of Email Campaigns

If you have consented to receive promotional materials from Vachon, we may periodically use your email address to send you information related to Vachon products and services. If you would like to stop receiving promotional materials from Vachon or the affiliated brands you can opt-out of emailing lists by clicking the unsubscribe link at the bottom of a promotional email.

About Children and individuals who haven't reached the age of majority

Generally, we do not intend to collect personal information from individuals under the age of 13 without parental consent. We may, from time to time, offer a contest where the child under the age of 13 can enter, in which case the personal information is only used for the purposes of administering the contest and determine a winner. Notwithstanding the above, children under the age of 13 who are legal residents of the Province of Quebec won't be allowed to participate to any publicity contest sponsored by Vachon. If a child under 13 has provided us with personal information, without parental consent, and is asked by a parent or a guardian of the child to request that this personal information be deleted from our records, we will make reasonable efforts to delete the child's personal information from our existing files. We encourage parents to talk to their children about their use of the Internet and the personal information they disclose to Web sites or otherwise.

We will also make reasonable efforts to delete all contact and other personal information obtained from an individual who haven't reached the age of majority in his/her province of residence if that individual or a parent or guardian notifies us that they wish to withdraw their consent for the collection of his or her personal information.

Security

We take reasonable steps to protect your personal information using physical, electronic or procedural security measures appropriate to the sensitivity of the personal information in our custody or control, which may include safeguards to protect against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Authorized employees, agents and mandataries of Vachon who require access to your personal information in order to fulfill their job requirements will have access to your personal information.

Access, Correction and Contacting Us

Vachon may establish and maintain a file of your personal information for the purposes described above. Vachon has appointed a Privacy Officer to oversee compliance with privacy legislation in Canada. If you wish to request access or correction of your personal information in our custody or control, you may write to P.O. Box 61027 Winnipeg, MB R3M 3X8, attention of Privacy Officer. Your right to access or correct your personal information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections. Inquiries, requests and complaints will be addressed within 30 days, proportional to the complexity of matter. If you wish to make inquiries or complaints or have other concerns about our personal information practices, [click here to contact us](#).

Links to Other Web Sites

This web site may contain links or references to web sites to which this Privacy Statement does not apply. Vachon is not responsible for the data collection and use practices of companies or organizations to which this web site may provide links.

Privacy Statement Changes

This Privacy Statement may be revised from time to time. If we intend to use or disclose Personal Information for purposes materially different than those described in this statement, we will make reasonable efforts to notify the affected individuals, if necessary, including by revising this Privacy Statement. If you are concerned about how your personal information is used, you should contact us as described above and check our website periodically at www.vachon.com/ to obtain a current copy of this statement. We urge you to request and review this Privacy Statement frequently to obtain the current version. Your continued provision of Personal Information or use of our services following any changes to this Privacy Statement constitutes your acceptance of any such changes. This privacy statement is effective and up to date as of ●, 2015.