#### PRIVACY POLICY

This Privacy Policy applies to: Breakwater Vantage Inc.

Last update: December 1, 2020

The respect of your private life is of the utmost importance for Breakwater Vantage Inc., who is responsible for this website.

This Privacy Policy aims to lay out:

- the way your personal information is collected and processed. "Personal information" means any information that could identify you, such as your name, your mailing address, your email address, your location and your IP address. "Personal information" is a synonym for "personal data" within the meaning of the Regulation 2016/679 of the European Union (General Data Protection Regulation);
- your rights regarding your personal information;
- who is responsible for the processing of the collected and processed information;
- to whom the information is transmitted;
- if applicable, the website's policy regarding cookies.

### 1. COLLECTION OF PERSONAL INFORMATION

We collect the following personal information:

- Last Name
- First name
- Mailing address
- Email address
- Phone and/or fax number
- Occupation

The personal information we collect is collected through the collection methods described in the following section.

#### 2. FORMS AND METHODS OF COLLECTION

Your personal information is collected through the following methods:

• Website registration form

We use the collected data for the following purposes:

Contact

• Managing the website

#### 3. INTERACTIVITY

Your personal information is also collected through the interactivity between you and the website. This personal information is collected through the following methods:

- Forum
- Comments
- Correspondence

We use the personal information thus collected for the following purposes:

- Statistics
- Contact
- Website management

### 4. COOKIES AND LOG FILES

We collect information through log files and cookies. These allow us to process statistics and information on traffic on the Website, to ease navigation and improve your experience for your comfort.

# a) Cookies used by the Website

The cookie files used on the Website are the following:

- IP address
- Operating system
- Pages visited and queries
- Day and time of connection

The use of such files allows us to achieve the following purposes:

• Statistical surveys

# b) Objection to the use of cookies and log files by the Website

You have the right to object to the recording of these cookies and log files by configuring your web browser.

Once you have deactivated cookies and log files, you may continue your use of the Website. However, any malfunction resulting from this deactivation may not be considered of our making.

#### 5. SHARING PERSONAL INFORMATION

The personal information collected by the Website is not transmitted to any third party and is processed only by us.

#### 6. STORAGE PERIOD OF PERSONAL INFORMATION

The controller will keep in its computer systems, in reasonable security conditions, the entirety of the personal information collected.

### 7. HOSTING OF PERSONAL INFORMATION

Our website is hosted by: Wix.com, located at the following address: Wix.com.

#### 8. CONTROLLER

### a) Controller

The Controller oversees determining the purposes for which personal information is processed and the means at the service of such processing.

# b) Obligations of the Controller

The Controller is committed to protecting the personal information collected, not to transmit it to third parties without informing you, and to respect the purposes for which personal information was collected.

In the event that the integrity, confidentiality or security of your personal information is compromised, the Controller is committed to notify you.

#### 9. RIGHT OF OBJECTION AND OF WITHDRAWAL

You have the right to object to the processing of your personal information by the Website ("right to object"). You also have the right to request that your personal information does not appear, for example, on a mailing list ("right to withdraw").

# 10. RIGHT OF ACCESS, OF RECTIFICATION AND OF REMOVAL

You have the right to consult, update, modify or request the removal of information about you.

### 13. SECURITY

Personal information we collect is stored in a secured environment. People working for us are obligated to respect the confidentiality of your personal information.

To ensure the security of your personal information, we use the following methods:

- SSL (Security Sockets Layer) Protocol
- Access management person authorized
- Access management person concerned
- Automatic backup

- Digital certificate
- Username/password
- Firewalls

We are committed to maintaining a high degree of confidentiality by integrating the latest technological innovations that allow us to ensure the confidentiality of your transactions. Nevertheless, no mechanism can ensure a complete security and transmitting personal information on the Internet always entail a part of risk.

#### 15. CHANGES TO OUR PRIVACY POLICY

Our Privacy Policy may be viewed at all times at the following address:

www.breakwatervantage.com

We reserve the right to modify our Privacy Policy in order to guarantee its compliance with the applicable law.

You are therefore invited to regularly consult our Privacy Policy to be informed of the latest changes.

#### 16. ACCEPTANCE OF OUR PRIVACY POLICY

By using our Website, you certify that you have read and understood this Privacy Policy and accept its conditions, more specifically conditions relating to the collection and processing of personal information, and the use of cookies.

### 17. APPLICABLE LAW

We are committed to respect the legislative provisions as specified in:

Personal Information Protection and Electronic Documents Act, SC 2000, c 5; and/or

Act Respecting the Protection of Personal Information in the Private Sector, CQLR cP-39.1; and

General Data Protection Regulation, Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 for the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.