



PRIVACY POLICY

Latest update: September 25th 2024

Alithya is committed to protecting your privacy and complying with applicable data protection laws. In this Privacy Policy, when we refer to “we,” “us” or “our”, we mean “Alithya Group inc.,” including our affiliates and subsidiaries worldwide.

This Policy describes our practices when collecting and processing your personal data. We have included information about how we protect your privacy and about your rights regarding your personal data. Please don't hesitate to contact our Privacy Officer, or our Data Protection Officer if you live in the European Union (“EU”) or in the European Economic Area (“EEA”), for any questions, comments, or concerns you may have:

Privacy Officer privacy@alithya.com 1100, boul. Robert-Bourassa, Suite 400 Montreal (Quebec) H3B 3A5 Canada Tel. 514.285.5552	Data Protection Officer privacy@alithya.com La Défense Cours Valmy - Le Belvédère 1-7 cours Valmy, 92800 Puteaux France Tel: 01.87.16.88.82
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1. What is personal data?

When we talk about “personal data” in this Policy, we mean any information which could be used to identify you, either directly or indirectly. For example, it includes any information which is not personal on its own, but which becomes personal data when associated with other information that allows us to identify you indirectly.

The definition of personal data may vary from one jurisdiction to another, and as such, may be protected in a different way under applicable privacy laws. Therefore, you may not have the same rights regarding this personal data depending on where you reside.

2. When does this Privacy Policy apply?

This Privacy Policy applies to personal data we collect and process about you during any interaction you may have with us. It applies when you visit www.alithya.com (our “website”), when you access our information for investors and shareholders and our

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pages through third-party social media sites such as LinkedIn, Instagram, Vimeo Facebook, YouTube, and so on.

It also applies when you communicate with us, when you apply for a career opportunity, or when you sign up to receive the Alithya newsletter.

We also process various types of personal data for the purposes of delivering our products and services to our clients and to you, the users. We support our clients and their users with the use of artificial intelligence and machine learning to deliver our digital application development, business strategy, enterprise solutions and data & analytics services. If you live in the EU/EEA, we thus act as a data processor and process the personal data of users according to the instructions of our clients, the data controllers. In this case, our clients are responsible for determining which lawful basis allows them to collect and process your personal data and, if applicable, to obtain your consent. If you have any questions relating to the collection and processing of your personal data by one of our clients, please contact them directly.

3. When does this Privacy Policy not apply?

Our website may contain links to other websites and social media sites operated by third parties. Please note that we have no control over how third parties collect and process your personal data. Third-party sites may have their own privacy policies. You should always read the privacy policy of each website you visit carefully.

4. What personal data do we collect about you and why?

We collect personal data *directly* from you when you visit our website, inquire about our products and services and submit your personal data for a career opportunity. In that case, under the *General Data Protection Regulation (GDPR)*, we act as a data controller, and we process your personal data either with your consent or under other legal basis for processing. Each time consent is the legal basis, you can withdraw your consent at any time. [Click here](#) to learn more on your data rights.

Marketing Data

Examples: name, email address, company name, business address, telephone number, preferences, and social media engagement.

When you visit our website, a cookie consent banner will prompt you to consent to our use of “preference,” “analytical” and “advertising” cookies. We have applied the privacy-by-default principle; these cookies will be blocked unless you provide us

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with an affirmative action to allow these cookies. Essential cookies are required for the proper functioning of our website and cannot be blocked.

If you consent to our use of advertising cookies, we collect and process marketing data to promote our products and services and to provide you with personalized and tailored advertising based on your preferences.

[Click here](#) to read our Cookie Policy, which explains in more detail how we use cookies, how we conduct interest-based advertising, and how you can manage your cookie preferences.

Based on your consent, we will also send you our newsletters and promotional emails to:

- / notify you of other Alithya products and services we think you might be interested in;
- / inform you of special events relating to Alithya;
- / provide you with industry information related to our strategic partners services and Alithya services and products; and
- / communicate our corporate activities, as well as press releases and financial results also disseminated to the financial community, investors, journalists and industry analysts.

You can also choose to participate in our various webinars and web conferences. To do so, you must register your name, email and your company name (or employer). We use service providers, including Digicast, StreamYard, and Zencast, to support the delivery of our webinars and web conferences. We will use your contact information to follow up with you, either by email or by telephone.

Under the GDPR, we process this information based on your consent. You may withdraw your consent at any time or unsubscribe directly in the emails by visiting our Cookies Preferences Centre or by contacting us at privacy@alithya.com. We process your personal data for our legitimate interests to ensure the proper functioning of our website.

Usage Information and Technical Log Data

Examples: Technical logs, IP address, browser type and configuration, operating system, number of visitors, pages viewed, length of visits, geographical location, language preferences and device information.

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When you visit our website, we collect usage information and technical log data in the form of personal data, anonymous data and aggregated data through the use of essential cookies. We collect this information to allow us to monitor and secure our website and to understand traffic patterns within our website. This information allows Alithya to ensure the content is presented efficiently and to optimize and improve our products and services when necessary.

Under the GDPR, we process this information based on our legitimate interests to maintain the security of our website and to tailor its content to meet your needs.

Job Application Data

Examples: Education, professional experiences, contact information, professional memberships, certifications, employment history

If you apply for one of our [job opportunities](#), we will collect and process the personal data you share with us, including your resume and any other attachments and content. This information allows Alithya to process employment applications and make recruitment decisions. Should your application be selected for a job offer, we will collect and use your credit score and criminal background check from our service provider.

Under the GDPR, we process this information based on your consent to provide us with your personal data.

Communication Data

Examples: Contact information, message content

If you communicate with us by email, through social media, our website chat service, our investor relations or otherwise, we will collect the personal data you share with us to respond to your communication.

We use third-party service providers to operate our chat function on our website. If not answered through the chatbot, your questions will be directed to the appropriate Alithya team member, who will respond to your request in a timely manner.

As a public company trading on TSX, Alithya activates its investor relations communications to share financial and corporate-related information about Alithya with the financial community, investors, shareholders, media outlets, industry analysts as well as other interested parties.

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Under the GDPR, we process this information based on performing a contract with you or with your consent, where applicable.

Client Data

When we act as a service provider, we process various types of personal data for the purposes of delivering our products and services to our clients and to you, the users. We support our clients and their users with the development of digital applications, control and software engineering, cybersecurity, the modernization of legacy systems and the development of cloud infrastructures. When appropriate, we use artificial intelligence and machine learning technologies. We also offer managed services and client portals for Microsoft Dynamics clients, Canadian clients in the energy sector as well as Oracle Cloud, ERP, EPM, and HCM clients.

In this respect, under the *General Data Protection Regulation (GDPR)*, ***we act as a data processor.***

Our clients are located in Canada, in the UE/EEA and the United States. They operate in the financial, investment/insurance, manufacturing, retail/distribution, telecommunications, transportation, professional services, healthcare, and government sectors.

We process such personal data in accordance with the instructions of our clients, who are responsible for determining which lawful basis allows them to collect and process your personal data and to obtain your consent when applicable under various Privacy laws.

You will find below the categories of personal data we may process on behalf of our clients.

- / **Contact Data:** name, physical address, email, telephone number
- / **Identification Data:** background verification, driver's license, passport number, account number, policy number, utility bill account number
- / **Financial Data:** credit card number, bank account, loans and mortgages, investments, payment information
- / **Preferences Data:** language, purchase history, feedback, online searches
- / **Employment Data:** resume, education history, employment history, recognitions and special awards, professional memberships, certifications
- / **Special Categories Data:** ethnic origin

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/ **Health Data:** medication prescriptions, doctors' names, frequency of appointments to medical clinics, medical records

Under the GDPR, we process this information based on performing a contract with our clients and according to our clients' instructions, which are outlined in our contractual agreements.

5. Will we contact you and how can you change this?

If you sign up to receive our newsletters, we will send you information and insights about our new products and services, exclusive offers and events or other interesting matters that we think might interest you.

Topics may include Microsoft ERP, CRM, business intelligence, LinkedIn services, Alithya's digital products as well as our financial and corporate information.

You can ask us to stop contacting you at any time by using the unsubscribe option in each email or by contacting us at privacy@alithya.com.

6. When do we share your personal data with others and why?

In addition, Alithya may share your personal data with the service providers assisting us in the delivery of our products and services. We have contractual agreements with our service providers to ensure they process your personal data according to our instructions. We also work with service providers that have implemented reasonable safeguards to protect your personal data.

Our service providers assist us mainly with these types of services:

- / Career/Employment
- / Infrastructure/Storage
- / Corporate Communications
- / Analytical/Statistical
- / Ad Conversion/Tracking and Personalized Content
- / Webinar Hosting
- / Corporate Management Service Provider ERP/HCM
- / Client Relationship Management (CRM)
- / Client Survey

We may also share your personal data with our subsidiaries located in Canada, the United States, the EU/EEA and elsewhere in the world when required to deliver the products and services described in this Privacy Policy.

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In addition, we may share your information when we believe such use or disclosure is permitted, necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to enforce or apply our policies and agreements; (e) to protect our rights, operations or property; (f) to collect amounts owed to us; (g) to allow us to pursue available remedies or limit the damages that we may sustain; (h) to protect the safety of our clients, users, visitors or others; (i) to address, prevent or stop fraud or other activity that we consider to be illegal or unethical; or (j) to address an emergency involving danger of death or serious harm.

In the event of change of ownership, sale, merger, liquidation, reorganization, acquisition of Alithya, in whole or in part, or in the event of any other business transactions or bankruptcy, your personal data may be transferred as part of the transaction.

7. Where do we store your personal data?

As a global company operating in multiple jurisdictions, we store your personal data in our data centers as well as in our cloud environments, which are located in the United States, in Canada, and in the EU/EEA. As such, Alithya's operations in the EU/EEA process and store the data of EU residents in accordance with GDPR and client requirements.

In some circumstances, and unless prohibited by law or contracts with our clients, we may work with service providers located in the United States to assist us with the delivery of our products and services.

If you would like more information about our policies and practices regarding the processing of personal data outside of Canada, United States and EU/EEA, please send us an email at privacy@alithya.com.

8. How do we protect your personal data?

Information Security is at the core of our business. We strive to adopt reasonable physical, technical and organizational security measures to help safeguard your personal data against loss or theft, unauthorized access, disclosure, copying, use, or modification.

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For instance, some of our services have achieved a SOC2 and/or an ISO 27001 certification. We require the same level of security of third parties that process your personal data on our behalf. We conduct thorough background checks before onboarding new employees and inform them of the importance of privacy protection.

Unfortunately, there exist many cyber threats; we therefore cannot guarantee that our safeguards will always be effective.

9. How long do we keep your personal data?

We keep the personal data we collect and process for as long as it is necessary to fulfill the purpose for which it was collected. We generally keep your personal data for as long as necessary to provide you with our products and services or as required by law, whichever is longer. Finally, we keep personal data processed on behalf of our clients for as long as it is required as per our clients' instructions and delete and destroy the personal data once the purposes of collection have been achieved.

10. How can you exercise your personal data rights?

You have rights when it comes to your personal data. However, these rights may vary depending on where you are located. These rights generally include the right to access and correct your personal data, as well as the right to withdraw your consent.

Under the GDPR, you have additional rights, such as the *right to object to the processing of your personal data*, the *right to data portability* and the *right to restrict the processing of your personal data in certain circumstances*. In the EU/EEA, you also have the right to define guidelines regarding your personal information after your death.

Our Privacy Officer and/or Data Protection Officer can answer your questions regarding how we process your personal data. They can also help you exercise your data rights; please reach out to us.

Once we receive your request, we'll get back to you within 30 days. For security reasons and to avoid fraudulent requests, we will ask you for a proof of identity; this said, we won't use this information for any other purposes. Keep in mind that there might be legal or other circumstances that prevent us from granting your request. If so, we will provide you with detailed explanations.

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The Office of the Privacy Commissioner of Canada (OPC) has published a number of [resources](#) to help you understand your data rights and how to take action. For more information, you can contact the Office of the Privacy Commissioner of Canada's Information Center [here](#).

If you live in Quebec, you can also read about your privacy rights on the Commission d'accès à l'information du Québec (Commission) website or reach them [here](#).

If you are located in the EU and you want to learn more about your rights, each EU country has set up national bodies responsible for protecting personal data in accordance with the GDPR. You can consult this link [here](#) to access your country's privacy protection office. You can find information on your EU privacy rights published by the Information Commissioner's Office (ICO) of the United Kingdom [here](#), and by France's *Commission Nationale de l'Informatique et des Libertés* [here](#).

If you're not satisfied with how we process your request, you can lodge a complaint with the OPC by filling out [this form](#); with the Commission by filling out [this form](#); with the ICO [here](#), and with the CNIL [here](#).

11. How often do we update this Privacy Policy?

We could make changes to this Privacy Policy to ensure it reflects our latest privacy protection practises. You can access the previous versions of this Privacy Policy by clicking [here](#). When required, we will send you an email explaining our changes.