

INTRODUCTION

At GFL Environmental Inc. and our subsidiaries and other affiliates (collectively, “GFL” or “we,” “us” or “our”), your privacy is important to us. We are committed to maintaining, as much as reasonably possible, the confidentiality, security and accuracy of personal information that we collect from you. This Privacy Policy (this “Policy”) describes, among other things, the information that GFL collects, how we use it and to whom that information may be disclosed.

This Policy applies to the activities of GFL within Canada and the United States. In particular, this Policy applies to any personal information we receive from or about individuals, like you, who are not employed by us.

If your residence is in Canada, this Policy (1) applies only to our activities that are subject to the provisions of Canada’s federal and provincial privacy legislation (including, but not limited to, the federal Personal Information Protection and Electronic Documents Act, Alberta’s Personal Information Protection Act and British Columbia’s Personal Information Protection Act) and (2) does not create or confer on you or on us any rights, or impose on us any obligations, beyond any rights conferred or obligations imposed by any applicable law and regulatory requirements.

WHAT IS PERSONAL INFORMATION?

For the purposes of this Policy, “personal information” means information about you that identifies, or can be used together with other reasonably available information to identify, you, or if applicable, as defined in any applicable law and regulatory requirements. However, personal information does not include (1) the name, title, or business address or telephone number of an employee of an organization when used for business communications or other business purposes or (2) information about our business customers, except to the extent such information is expressly included in “personal information” under any applicable law and regulatory requirements.

PERSONAL INFORMATION WE COLLECT

We collect and maintain different types of personal information about you, including the following:

- Contact and identification information, such as name, address, telephone number, e-mail address and date of birth;
- Information about the products and services that we provide to you;

- Banking, credit and other financial information (including, but not limited to, credit or debit card number, security code and expiration date, bank routing and account number, and other billing, credit and payment history information);
- Customer relationship information, such as the number of nature of customer service requests;
- Information contained in any correspondence from you to us; and
- Digital information of the nature described below in “How We Collect Personal Information.”

HOW WE COLLECT PERSONAL INFORMATION

We usually collect personal information directly from you, which you must voluntarily provide. However, we may use third parties to collect personal information on our behalf and may otherwise collect personal information from third parties (see “Notification Respecting Third-Party Service Providers” below).

We may collect personal information (including, but not limited to, information regarding computer access points, mobile devices, and the web browser used to connect to our websites through a number of means and methods (including, but not limited to, in telephone or email communications with you and through automated tools or digital applications on our websites which collect personal information about you when you access or use our websites).

We may use cookies to personalize your interactions with our websites. You (1) do not have to accept our cookies, (2) may set your browser to restrict their use and (3) may delete them after they have been placed on your computer or mobile devices. If you do not accept (or if you delete) our cookies you may find that some areas of our websites may take more time to respond or may not properly function. Before using our websites, you are advised to check your current browser settings to ensure that the settings reflect your consent for us to place cookies on your devices.

We may also collect additional information from your web browsers each time you visit one of our websites. We may collect information about the pages that you visit and the time you spend on each web page or area of the websites, and other actions that you take while using our websites. This information may include, among other things, your Internet Protocol (“IP”) address, the type of

browser used to access our websites, the time that your browser was used to access our websites, and the referring website's address.

Our Internet service providers may also use other standard web-based technologies to analyze your movements while accessing our websites. These technologies help us (1) ascertain the effectiveness of our product and service campaigns and marketing programs, (2) customize the services offered on or through our websites, and (3) determine the best use for website content, and product and service offerings. Some of this information (including, but not limited to, your IP address) may be stored on our Internet service provider's server logs for extended periods of time.

THIRD-PARTY SERVICE PROVIDERS

We may use third-party service providers to collect, process and store personal information for the purposes set forth in this Policy (including, but not limited to, service providers located outside of Canada if your residence is in Canada or the United States if your residence is in the United States). By providing us with personal information, you are consenting to our use of such information in accordance with this Policy, including its transfer to third-party service providers across international boundaries.

To ask questions or to obtain information about our policies and practices regarding third-party service providers that we use, you may write to our Privacy Officer at the address listed below in the "Contacting Us" section.

PURPOSES FOR COLLECTING, USING AND DISCLOSING PERSONAL INFORMATION

We collect, use and disclose personal information to allow us to manage and develop our business operations and for other legitimate business purposes, including the following:

- Establish, manage and terminate business relations with you;
- Review the products and services that we provide to you;
- Inform you of our products and services in addition to those that you may have specifically requested;
- Protect us against (1) errors or fraud or (2) theft of, and damage to, our tangible and intangible property;

- Enable us to comply with applicable law and regulatory requirements;
- Assess your creditworthiness if you are requesting or receiving products or service from us;
- Undertake market research;
- Enforce and otherwise protect our rights and property, such as collecting a debt; and
- Enable us to achieve the other purposes described in this Policy or to which you otherwise consent.

Personal information may also be used during emergency situations or when necessary to protect the safety of a person or group of persons and may otherwise be disclosed to:

1. Employees, contractors, consultants and other third parties who use such information to assist us in establishing, maintaining and managing our business relationship with you (including, but not limited to, third parties that provide services to us or on our behalf or third parties that collaborate with us in providing services to you);
2. Any governmental authority or other third party in connection with the investigation of, or the prevention of, criminal or other illegal or objectionable conduct; and
3. Third parties in connection with a change in ownership of all or a part of GFL through an amalgamation, merger or consolidation, purchase, sale or lease of all or substantially all of our assets or other form of business combination; provided however, that such third parties are bound by appropriate agreements or other obligations which require them to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Policy, unless you consent otherwise.

We may also use or disclose personal information without your knowledge or consent when we are permitted or required to do so under applicable law and regulatory requirements. When we collect personal information, the purposes for collecting the information will be communicated to you before or at the time of collection only to the extent required under applicable law and regulatory requirements.

CONSENT

We collect, use and disclose your personal information only with your consent to do so to the extent such consent is required under applicable law and regulatory requirements. If applicable, consent may be express, implied or deemed. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you accept our products or services, we are entitled to assume you consent to the collection, use and disclosure of your personal information for purposes related to your acceptance and use of those products or services, or for other related purposes. Deemed consent is consent we are entitled to assume in the event that you do not exercise an opt-out mechanism offered to you.

We will seek consent at the time your personal information is collected by us only to the extent required under applicable law or regulatory requirements. In some circumstances, such consents may be obtained after collection, but prior to our use or disclosure of the personal information, to the extent permitted under applicable law and regulatory requirements. If we plan to use or disclose personal information for a purpose not previously identified (either in this Policy or otherwise), we will, if required under applicable law and regulatory requirements, advise you of that purpose and obtain your consent before such use or disclosure.

We may collect, use or disclose personal information without your knowledge or consent when we are permitted or required to do so under applicable law and regulatory requirements.

CHOICE

You may only change or withdraw any consent given by you in connection with this Policy, subject to any legal or contractual restrictions and obligations upon your giving us reasonable prior notice of not less than 30 days, by contacting in writing the office of our Privacy Officer using the contact information set forth below in under “Contacting Us” or via other means and methods expressly permitted under applicable law and regulatory requirements. You should know that, in some circumstances, a change in or withdrawal of consent may limit our ability to provide products or services to, or acquire products or services from, you. We assume that, by continuing to deal with us, you have consented to the collection, use and disclosure of your personal information as set forth in this Policy.

SAFEGUARDING PERSONAL INFORMATION

We will use commercially reasonable efforts to safeguard personal information using methods that are appropriate to the sensitivity of the information and in accordance with applicable law and regulatory requirements.

ACCURACY OF PERSONAL INFORMATION

All personal information that is provided to us must at all times be accurate and current. In providing your personal information to us, you are responsible for the accuracy and completeness of such information. You must promptly keep us informed of any changes to your personal information. We will endeavor to ensure that all personal information obtained from third parties is accurate and complete; provided, however, that we accept no liability or responsibility for any inaccuracy or incompleteness of such information.

RETAINING PERSONAL INFORMATION

Except as otherwise permitted or required under applicable law and regulatory requirements, we will endeavor to retain personal information only for as long as is necessary to fulfill the purposes for which the personal information was collected.

ACCESSING YOUR PERSONAL INFORMATION

You can ask to see any of your personal information held by us. If you want to review, verify or correct your personal information, you must contact in writing our Privacy Officer using the contact information set forth below.

When making an access request, we require specific information to confirm your identity and right to access, as well as to search for and provide the personal information that we hold. We may charge you a fee to access your personal information, but we will advise of any such fee in advance. If help is needed to prepare your request, please contact the office of our Privacy Officer (see "Contacting Us" below).

We may refuse your request for access to personal information if such refusal is permitted or required under applicable law and regulatory requirements. We will inform you of any reasons why, subject to any legal or regulatory restrictions, access has been denied.

COMPLAINTS

Questions, complaints and other communications regarding this Policy must be directed to our Privacy Officer (see “Contacting Us” below). We will maintain procedures to receive and investigate complaints from you and you will be advised of the results of any such investigation. Upon our advising you of the results of any such investigation, you and we must then attempt, in good faith, to promptly resolve any remaining aspects of your complaint. If any aspect of your complaint remains unresolved after a reasonable period of time of not less than 30 days, and you decide to pursue additional remedies, you may, within one year after our initial response to your complaint, only commence a legal proceeding against us regarding the unresolved aspects of your complaint with (1) an administrative agency (or other similar governmental authority) having personal and subject matter jurisdiction or (2) a court having subject matter jurisdiction in Metropolitan Toronto if your residence is in Canada or the county of Macomb, Michigan if your residence is in the United States. You agree to any such court’s being a proper venue for such legal proceeding and waive any right to object to such court’s being an improper venue, whether for convenience or otherwise.

CONTACTING US

For questions, complaints, or to obtain more information regarding this Policy, or change or withdraw any consent given under this Policy, you must contact us as follows:

By email:

privacyofficer@gflenv.com

By mail:

Privacy Officer
GFL Environmental Inc.
100 New Park Place
Suite 500
Vaughan, Ontario
L4K 0H9

REVISIONS

We may make changes to this Policy to reflect changes in any applicable law or regulatory requirements or in the manner in which we deal with personal

information. We will post any revised version of this Policy on our websites. Any change to this Policy will be effective immediately upon its being posted to our websites; provided, however, that any such change relating to why we collect, use or disclose your personal information will not apply to any information collected by us prior to the effective of such change, unless you consent to such change.

SEVERABILITY

Whenever possible, each provision of this Policy shall be interpreted to be effective and valid under applicable law and regulatory requirements. If, however, any such provision is prohibited by, or invalid under, applicable law and regulatory requirements, it shall be deemed modified to conform to the minimum requirements thereof, or if for any reason it is not so modified, it shall be prohibited or invalid only to the extent of such prohibition or invalidity without the remainder of such provision, or any other provision of this Policy, being prohibited or invalid.

APPLICABLE LAW

This Policy is governed by, and shall be construed and interpreted in accordance with, the laws of the province of Ontario if your residence is in Canada or the state of Delaware if your residence is in the United States, without regard to their principles of conflict of laws.