

GFL Privacy Policy

At GFL, your privacy is important to us. We are committed to maintaining the confidentiality, security and accuracy of personal information that we collect. This Privacy Policy (the "**Privacy Policy**") describes, among other things, the information that GFL collects, how we use it and to whom that information may be disclosed.

This Privacy Policy applies to the activities of GFL Environmental Inc. and its subsidiaries and affiliates within Canada (collectively "**GFL**" and alternatively referred to herein as "**we**", "**us**" or "**our**").

In particular, this Privacy Policy applies to any personal information we receive from or about individuals, like you, who are not employed by us.

This Privacy Policy applies only to our activities that are subject to the provisions of Canada's federal and provincial privacy legislation, including, where applicable, the federal *Personal Information Protection and Electronic Documents Act*, Alberta's *Personal Information Protection Act* and British Columbia's *Personal Information Protection Act* (collectively or individually, the "**applicable law and regulatory requirements**").

What is Personal Information?

For the purposes of this Privacy Policy, "**personal information**" means information about you that is defined as such in the applicable law and regulatory requirements. Personal information does not include the name, title, business address or telephone number of an employee of an organization when used for business communications. Information about our business customers is not covered by this Privacy Policy except to the extent such information is "personal information" under applicable law and regulatory requirements.

The Personal Information We Collect

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

- 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;
- Credit and financial information, such as payment card or other banking information, including, credit or debit card number and expiration date, bank routing and account number, and other billing, credit and payment history information;
- Customer relationship information, such as customer service requests; and,
- Digital information of the nature described below in "How We Collect Personal Information".

How We Collect Personal Information

As a general rule, we collect personal information directly from you; 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 through a number of means and methods, including, directly 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, including, computer access points, mobile devices, and the web browser used to connect to our websites. We may use cookies to personalize

interactions with our websites. You do not have to accept our cookies and may set your browser to restrict their use and may delete them after they have been placed on your computer or mobile devices. If you do not accept (or delete) our cookies you may find that some areas of our websites may take more time to work or may not function properly. 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 website. This information may include your Internet Protocol (“IP”) address, the type of browser, 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 the movements of you while accessing our websites. These technologies help us ascertain the effectiveness of our product and service campaigns and marketing programs, allow us to customize the services offered on or through our websites, and help determine the best use for website content, and product and service offerings. Some of this information, including the IP address, may be stored on our Internet service provider’s server logs for extended periods of time.

Notification Respecting Third Party Service Providers

We may use third party service providers to collect and/or process and/or store personal information for the purposes set out in this Privacy Policy, including service providers located outside of Canada. By providing us with personal information, you are consenting to our use of the personal information in accordance with this Privacy Policy, including the transfer of it to third party service providers across international boundaries.

To ask questions or to obtain written 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.

The Purposes for Collecting, Using and Disclosing Personal Information

We collect, use and disclose personal information to allow us to manage and develop our business and operations, including to:

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

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

- (i) employees, contractors, consultants and others (including between entities within GFL) who require the information to assist us in establishing, maintaining and managing our business relationship with you, including, for example, third parties that provide services to us or on our behalf or third parties that collaborate with us in the provision of services to you, and
- (ii) another party, in the event of a change in ownership of all or a part of GFL through some form of merger, purchase, sale, lease or amalgamation or other form of business combination; provided that the parties are bound by appropriate agreements or obligations which require them to use or disclose the personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

We may also use or disclose personal information without your knowledge or consent where we are permitted or required by applicable law and regulatory requirements to do so. When we collect personal information, the purpose(s) for collecting the information will be communicated before or at the time of collection as required by applicable law and regulatory requirements.

Consent

It is important to us that we collect, use and disclose personal information only where we have consent to do so to the extent such consent is required under applicable law and regulatory requirements.

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 purposes identified at the relevant time. Deemed consent is consent we are entitled to assume in the event that you do not exercise an opt-out mechanism you are offered.

Typically, we will seek required consents at the time that we collect the personal information. In some circumstances, such consents may be obtained after collection but prior to our use or disclosure of the personal information, to the extent same is 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 Privacy Policy or separately), we will, if required by 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 where we are permitted or required to do so by applicable law and regulatory requirements.

Choice

You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting the office of our Privacy Officer using the contact information set out below in under “*Contacting Us*” or via other means and methods used in accordance with 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 explained in this Privacy Policy.

Safeguarding Personal Information

We will endeavor 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

It is important that the personal information we hold is accurate and current. We require you to keep us informed of changes to any personal information. We will endeavor to ensure that all personal information obtained from third parties is accurate; however, we accept no responsibility for any such inaccuracy.

Retaining Personal Information

Except as otherwise permitted or required by 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 the personal information that we hold about you. If you want to review, verify or correct your personal information you should contact our Privacy Officer using the contact information set out below. Please note that any such communications must be in writing.

When making an access request, we require specific information to confirm 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 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 not be able to provide access to personal information, where such refusal is permitted or required by applicable law and regulatory requirements. We will inform you of reasons why, subject to any legal or regulatory restrictions, access has been denied.

Handling Complaints

Questions or concerns about this Privacy Policy can be directed to our Privacy Officer (see “*Contacting Us*” below). We will maintain procedures to receive and investigate complaints and complainants will be advised of the results of any such investigation.

Contacting Us

To get more information about GFL's Privacy Policy, change or withdraw consent or make a complaint under this Privacy Policy, contact us:

By Email:

privacypolicy@gflenv.com

By Mail:

Privacy Officer (c/o Legal Department)

GFL Environmental Inc.

125 Villarboit Crescent, Suite B

Vaughan, ON L4K 4K2

Revision to this Privacy Policy

We may make changes to this Privacy Policy to reflect changes in legal or regulatory obligations (including, under the applicable law and regulatory requirements) or changes in the manner in which we deal with personal information. We will post any revised version of this Privacy Policy on our website. Any changes to this Privacy Policy will be effective from the time they are posted, provided that any change that relates to why we collect, use or disclose your personal information will not apply unless you consent to that change, to the extent such consent is required under applicable laws and regulatory requirements.

This Privacy Policy 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 the applicable laws and regulatory requirements.

Created: July 7, 2014