

# OSISKO GOLD ROYALTIES LTD

## Privacy Notice

Osisko Gold Royalties Ltd (“**Osisko**” or the “**Corporation**”) understands and respects the importance of the Personal Information that it collects to manage its business. The Corporation has developed the present privacy notice (the “**Notice**”) to explain how it collects, uses, and discloses (“**Process**” or “**Processes**”) information about identifiable individuals (“**Personal Information**”) such as you when they visit Osisko’s website at [www.osiskogr.com/en](http://www.osiskogr.com/en). This Notice also describes your Personal Information protection rights and how to exercise them.

Osisko is subject to the *Act respecting the protection of personal information in the private sector* (Québec) (the “**Act**”). Some provisions contained in this Notice may exceed the requirements of the Act. In such circumstance, the Corporation has full discretion with respect to their application.

### 1. Notice Requirements

#### 1.1 Accountability: Who is Responsible for my Personal Information?

Osisko is responsible for the Personal Information it Processes. The Corporation has appointed two persons as Chief Privacy Officer (“**CPO**”) to oversee its compliance with applicable Personal Information protection legislation.

##### 1.1.1 Osisko Gold Royalties Ltd Contact details

1100 Avenue des Canadiens-de-Montréal, Suite 300  
Montréal, Québec  
Canada  
H3B 2S2  
514 940-0670

##### 1.1.2 Contact details of Osisko’s CPO

Messrs. Andre Le Bel or Frédéric Ruel  
1100 Avenue des Canadiens-de-Montréal, Suite 300  
Montréal, Québec  
Canada  
H3B 2S2  
[rprp@osiskogr.com](mailto:rprp@osiskogr.com)

#### 1.2 What Personal Information does Osisko Processes, how and why?

Osisko Processes your Personal Information to manage its business. The table below describes the Personal Information types that the Corporation Processes, how it collects it, and why.

Personal Information Type	Method of Collection	Reason for Processing
Email address.	Collected directly from you when you send to Osisko an inquiry or when you correspond with the Corporation by phone, email or other electronic means, or in writing, or when you provide other information directly to Osisko, including in conversation with its employees.	Respond to your request.
Professional résumé.	Collected directly from you when you submit your résumé.	Assess your qualifications for employment by Osisko.
Internet connection details such as your IP address, the time and date at which you visited and the amount of time you spent on Osisko's website	Collected directly from you when you browse, complete a form (including information reporting a problem with the website) or make an enquiry or otherwise interact on its website or other online platforms you are willingly providing information which could be included in the collection of Personal Information.	Continuously improve Osisko's website and content.
As otherwise permitted or required by the Act.	Directly from you or from another source as permitted or required by the Act.	<p>As required to comply with any legal duties or to take legal action including:</p> <ul style="list-style-type: none"> <li>(i) to protect Osisko's rights and safety as well as that of any third parties;</li> <li>(ii) to comply with any legal requirements or court orders;</li> <li>(iii) to prosecute and defend a court, arbitration, or similar proceeding; and</li> <li>(iv) to communicate this information to any advisors who assists Osisko's in complying with legal, accounting, or security requirements.</li> </ul>

Please note however that if you provide Personal Information to Osisko about anyone other than yourself, whether they are your employees, counterparties, your advisers, or your suppliers, you must ensure that they understand how their information will be used, and that they have given their consent for you to disclose it to Osisko and for you to allow the Corporation, and its outsourced service providers, to use it.

Osisko will only provide you with investor relation related information after you have, where legally required to do so, opted to receive those communications and having provided the opportunity for you to opt out at any time.

Osisko will not use your Personal Information for: (i) taking any automated decisions affecting or creating profiles other than as described above or (ii) a purpose other than for which it was collected except with your consent unless: (a) legal, medical or security reasons make it impossible to obtain consent; or (b) Osisko is permitted or required to do so by applicable laws.

### **1.3 What happens if I don't provide my Personal Information?**

Where Osisko needs to collect Personal Information by law or in order to Process your instructions and you fail to provide that Personal Information when requested, the Corporation may not be able to carry out your instructions. In this case, Osisko may have to cancel its engagement, which will be communicated to you in a timely manner.

### **1.4 How much Personal Information does Osisko Require?**

Osisko limits the Personal Information it Processes to what is necessary for managing its business.

### **1.5 How is your Personal Information Processed when using Osisko's Website?**

#### **1.5.1 Information collected from your use of Osisko's website**

To ensure Osisko's website is optimized for ease of use, and/or for future communications, the Corporation or its service provider(s) may use cookies to collect standard internet information about how and when you use the website. This information may include but is not limited to your IP address and location data, weblogs, time, date, language preferences, browser used, referring web addresses, other communication data, searches conducted and pages visited.

Osisko's investor relations email may contain a single, campaign-unique "web beacon pixel" to tell the Corporation whether its email is opened and combined with other technology verify any clicks through to links within the email. Osisko may use the information for purposes including determining which of its email is more interesting to you and to query whether users who do not open Osisko's email wish to continue receiving them. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, through email you can opt not to download images from Osisko.

You may also choose not to click in the email investor relation communications that Osisko send you. This information may be connected to your personal identity.

#### **1.5.2 Social media widgets**

Osisko's website may include widgets, such as a "Share This" button or interactive mini-programs that run on its website. These features may collect your IP address, which page you visit on Osisko's website, and may set a cookie to enable the feature to function properly. Social media features and

widgets are either hosted by a third party or hosted directly on Osisko's website. Your interactions with these features are governed by the privacy policy of the company providing such service.

### **1.5.3 External links on Osisko's Website**

Osisko's website includes links to other websites, the privacy practices of which may differ from ours. If you submit Personal Information to any of those websites, your information is governed by the Personal Information protection policies of those websites and the Corporation does not accept any responsibility or liability in respect of third-party sites. Please check the privacy policies published on any third-party sites which you may access through Osisko's website before submitting Personal Information to them.

### **1.6 Does Osisko share your Personal Information?**

Osisko shares your Personal Information only in the following circumstances and with the following recipients:

- (i) with service providers who the Corporation engages within or outside of Osisko, domestically or abroad, (e.g. shared service centres), to Process Personal Information for any of the purposes listed above on Osisko's behalf and in accordance with Osisko's instructions only;
- (ii) with courts, law enforcement authorities, regulators, government officials or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim; and
- (iii) if the Corporation engages in a commercial or business transaction - as defined by applicable privacy legislation - in which case Osisko may disclose your Personal Information to the prospective seller or buyer of such business or assets to whom the Corporation assigns or novates any of its rights and obligations.

Please note that Osisko, its third-party service providers and other third parties to whom the Corporation discloses information under the Notice may perform activities outside of Canada.

Any Personal Information that is Processed in countries outside of Canada may be subject to the laws of those countries (e.g. where a third party service provider operates internationally). As a result, Personal Information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement officials in countries outside of Canada.

You may seek additional information regarding the Processing of your Personal Information outside of Canada by contacting Osisko's CPO at the contact details found in Subsection 1.1.2 above.

### **1.7 How long does Osisko retain your Personal Information?**

Osisko will not retain Personal Information longer than is necessary to fulfil the purpose for which it was collected including for the purposes of satisfying any legal, accounting, or reporting requirements and, where required for the Corporation to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled. As this purpose varies depending on the Personal Information involved, the Corporation invites you to contact Osisko's CPO for any inquiries pertaining specifically to you.

Upon expiry of the applicable retention period, Osisko will securely destroy your Personal Information in accordance with applicable laws and regulations and with its Document Retention Policy.

### **1.8 How does Osisko ensure your Personal Information is accurate?**

Osisko uses reasonable efforts to ensure that your Personal Information is kept as accurate, complete, and up to date as possible. The Corporation does not routinely update your Personal Information, unless such an update is necessary. In order to help the Corporation to maintain and ensure that your Personal Information is accurate and up to date, you must inform Osisko, without delay, of any change in the information you provide to it.

### **1.9 How does Osisko Safeguard your Personal Information?**

Osisko is committed to protecting the confidentiality, integrity, and availability of your Personal Information. The Corporation employs security safeguards that are customary by public companies in the mining sector and appropriate to the sensitivity of the information, including physical, organizational, and technological measures. Examples of such measures include restricted access to offices, training of personnel, limiting access to information on a “need-to-know” basis, using passwords and well-defined internal policies and practices.

Unfortunately, the transmission of information via the internet is not completely secure. Although Osisko uses reasonable efforts to protect your Personal Information, it cannot guarantee the security of data transmitted to its website. Any transmission you provide is at your own risk. Once Osisko has received your information, it will apply its security practices to try to prevent unauthorized access, use and/or disclosure.

Osisko may store and Process your Personal Information at its Montréal offices. The Corporation uses contractual and other means to provide a comparable level of protection while information is being stored, handled, and Processed using any third party service providers.

### **1.10 Whom to contact with Questions**

Osisko is committed to being transparent about its policies and invites you to contact the CPO with any question you may have on the foregoing or to visit its website.

### **1.11 What are your rights?**

You have various rights with respect to Osisko’s use of your Personal Information:

- (a) **Access:** You have the right to request whether Osisko holds Personal Information on you and to request a copy of such information. To do so, please contact the Corporation at the details provided at Subsection 1.1.2. There are exceptions to this right, so that access may be denied if, for example, making the information available to you would reveal Personal Information about another person, or if Osisko is legally prevented from disclosing such information.
- (b) **Accuracy:** Osisko aims to keep your Personal Information accurate, current, and complete. The Corporation encourages you to contact it at the details provided at Subsection 1.1.2 to let it know if any Personal Information is not accurate or changes, so that Osisko can update your Personal Information.
- (c) **Consent Withdrawal:** If you have provided your consent to the Processing of your Personal Information, you have the right to fully or partly withdraw your consent. To withdraw your consent please follow the opt-out links on any investor relation message sent to you or contact the CPO at the details provided at Subsection 1.1.2. Once Osisko has received notification that you have withdrawn your consent, it will no longer

Process your information for the purpose(s) to which you originally consented unless there is another legal ground for the Processing. Withdrawal of consent to receive investor relation communications will not affect the Processing of Personal Information for the provision of Osisko's services.

- (d) **Cessation of Dissemination:** You have the right to request that Osisko ceases disseminating your Personal Information if the dissemination is contrary to the Act or a court order.

You also have the right to request that Osisko ceases disseminating your Personal Information where the following conditions are met:

- (i) the dissemination of the information causes you serious prejudice in relation to your right to have your reputation or privacy respected;
- (ii) the prejudice is clearly greater than the public's interest in knowing the information or the interest of any person's right to express themselves freely; and
- (iii) the cessation of dissemination requested does not exceed what is necessary for preventing the perpetuation of the prejudice.

- (e) **De-indexation:** You have the right to request that Osisko de-index any hyperlink attached to your name that provides access to information by a technological means if the dissemination is contrary to the Act or a court order.

You also have the right to request that the Corporation de-index a link providing access to information where the following conditions are met:

- (i) the dissemination of the information causes you serious prejudice in relation to your right to have your reputation or privacy respected;
- (ii) the prejudice is clearly greater than the public's interest in knowing the information or the interest of any person's right to express themselves freely; and
- (iii) the cessation of dissemination requested does not exceed what is necessary for preventing the perpetuation of the prejudice.

- (f) **Re-indexation:** You also have the right to request that Osisko re-index a link providing access to information where the following conditions are met:

- (i) a failure to do so causes you serious prejudice in relation to your right to have your reputation or privacy respected;
- (ii) the prejudice caused by a failure to re-index is greater than the public's interest in knowing the information or the interest of any person's right to express themselves freely; and
- (iii) the re-indexation requested does not exceed what is necessary for preventing the perpetuation of the prejudice.

- (g) **Mobility:** You have the right to request that computerized Personal Information collected from you be communicated to you in a commonly used technological format as well as to any person or body authorized by the Act to collect such information. This right does not extend to information that was created or inferred from your Personal Information and Osisko is under no obligation to communicate such information if doing so raises serious practical difficulties.
- (h) **Complaints:** If you believe that your Personal Information protection rights may have been violated, you have the right to lodge a complaint with the applicable supervisory authority with the *Commission d'accès à l'information du Québec* at <https://www.cai.gouv.qc.ca/>, or to seek a remedy through the courts.

You may enquire about your Personal Information by contacting Osisko's CPO or making a request to view your Personal Information at the details provided at Subsection 1.1.2.

Osisko will generally respond to all access requests within 30 days of the receipt of all necessary information. In circumstances where the Corporation is not able to provide access, or if additional time is required to fulfill a request, it will advise you in writing.

Osisko may not release certain types of information based upon exemptions specified in applicable laws. Where possible, the Corporation will sever the information that will not be disclosed and provide you with access to the remaining information. Should Osisko be unable to provide access to or disclose Personal Information to you, it will provide you with an explanation, subject to restrictions.

In certain circumstances, such as where the request is excessive or unfounded, Osisko may charge you an administration fee for access to your Personal Information. The Corporation may also charge for additional copies and it will advise you of any fees before proceeding with a request.

## **1.12 How does Osisko resolve your concerns?**

Any report, concern, complaint or incident of which Osisko becomes aware that involves conduct that may contravene the Notice will be treated confidentially to the extent possible. However, some disclosure may be necessary to adequately address issues raised, aid enquiry and implement solutions, as appropriate.

### **1.12.1 Incident reporting and escalation process**

Osisko takes all potential or actual Personal Information breaches seriously.

You may report your concerns about the Processing of your Personal Information directly to Osisko's CPO at the details provided at Subsection 1.1.2.

The CPO will engage the appropriate levels of management to assist with resolution of the issue.

### **1.12.2 Alternative actions**

While Osisko is committed to resolving all Personal Information matters internally, nothing in the Notice precludes you from contacting the appropriate provincial privacy commissioner.

## **2. Roles and responsibilities**

Osisko is responsible for communicating the Notice and ensuring that employees fully comply with all relevant aspects of the Notice and the accompanying guidelines.

## **2.1 Osisko's Chief Privacy Officer (CPO)**

The CPO is responsible for:

- (a) developing Osisko's Personal Information protection strategy;
- (b) developing and maintaining the Notice, accompanying guidelines and any other policy or procedure related to Personal Information and ensuring they comply with applicable law; and
- (c) serving as the official liaison with the provincial commissioner.

## **3. Maintenance and Review**

The Notice is effective September 22, 2023 and supersedes all prior versions.

Osisko reserves the right to interpret the Notice at its sole discretion and to make changes as it deems appropriate from time to time without the requirement of advanced notice.

Personal Information protection legislation continues to evolve and, as a result, this Notice may be amended by Osisko from time to time at its full discretion without any prior notice or liability to you or any other persons. The updated version of the Notice will be posted on Osisko's website and the Processing of your Personal Information by the Corporation will be governed by the version of this Notice in effect at the relevant time.