

## PERSONAL INFORMATION GOVERNANCE POLICY

Effective date: **March 01, 2025**

Last update : **March 01, 2025**

### Content

PERSONAL INFORMATION GOVERNANCE POLICY .....	1
1. BACKGROUND .....	2
2. DEFINITION OF PERSONAL INFORMATION .....	2
3. COLLECTION OF PERSONAL INFORMATION.....	2
4. USE OF PERSONAL INFORMATION .....	3
5. OUR PURPOSES IN COLLECTING, USING AND RETAINING PERSONAL INFORMATION .....	3
6. DISCLOSURE OF PERSONAL INFORMATION .....	4
7. THIRD PARTIES AND THIRD-PARTY WEBSITES; COOKIES AND OTHER TRACKING TECHNOLOGIES .....	4
8. RETENTION OF PERSONAL INFORMATION.....	5
9. PROTECTION OF PERSONAL INFORMATION .....	5
9.1. We limit access to personal information.....	5
9.2. We implement robust security measures .....	6
9.3. We limit the retention of personal information and destroy it securely. ....	6
10. RIGHTS CONCERNING PERSONAL INFORMATION.....	6
11. EXERCISING RIGHTS.....	7
12. HANDLING PROCEDURE FOR REQUESTS AND COMPLAINTS .....	7
12.1. Applicable procedure.....	7
12.2. Processing requests and complaints.....	8
13. APPROVAL AND CONTACT .....	8

## 1. BACKGROUND

Les Productions Expert'Ease Inc (“XPAV - Expert'Ease”, “Organization”, “We”, “Us”, “Our”, “Ours”) values and respects privacy and recognizes that it must maintain and use all personal information responsibly. This Personal Information Governance Policy (“Policy”) applies to interactions with XPAV - Expert'Ease and is intended to demonstrate our firm commitment to privacy and the security of personal information.

Any changes to this policy will be posted on our website. You are encouraged to review our [Privacy Policy](#) to learn more about our privacy practices.

The purpose of this policy is to inform you about

- XPAV - Expert'Ease's practices regarding the collection, use, retention and disclosure of personal information;
- The framework followed for the retention and destruction of personal information;
- The roles and responsibilities of XPAV - Expert'Ease personnel throughout the life cycle of personal information;
- The procedure for handling questions and complaints concerning personal information.

## 2. DEFINITION OF PERSONAL INFORMATION

For the purposes of this policy, personal information is any information that directly or indirectly identifies an individual or could reasonably be associated with that individual. This information may include a name, address, e-mail address, telephone number, etc. Some information, given its particularly private nature, such as medical information, is *sensitive* personal information.

## 3. COLLECTION OF PERSONAL INFORMATION

We collect information when we have a serious and legitimate interest in doing so. The collection of personal information is limited to that which is necessary to fulfill the purpose for which it is collected.

As a general rule, we collect personal information directly from individuals. Examples of direct collection of personal information include: (a) contacting us or subscribing to our marketing communications, (b) communicating with us by telephone, e-mail or otherwise, (c) completing an employment application.

We may collect personal information from third parties. This collection by third parties may be necessary to use certain services or to do business with us. If this information is not collected directly from the individual concerned, the latter may request the source of the information.

#### **4. USE OF PERSONAL INFORMATION**

We use personal information only for the purposes generally identified in this Policy or for any other purpose identified at the time of collection. Where necessary, we will obtain the consent of the individual.

We will ensure that the information we hold is up-to-date and accurate at the time we use it to make a decision.

#### **5. OUR PURPOSES IN COLLECTING, USING AND RETAINING PERSONAL INFORMATION**

We process personal information for the following purposes:

**To provide our services.** We process personal information in order to provide our services, such as:

- Verifying a person's identity;
- Taking, verifying or updating customer instructions;
- Administering accounts, responding to requests and questions.

**Management and development of our business.** We process personal information to manage our operations, for example:

- Processing employment applications;
- To meet our contractual, legal and regulatory obligations;
- Protect ourselves and third parties against error and fraud.

**Marketing.** If an individual has consented to receive such communications, we may use his or her personal information for promotional purposes.

If a person no longer wishes to receive this type of communication, they should let us know by following the unsubscribe instructions provided in our communications, or by contacting us as set out in the “Handling procedure for requests and complaints” section below.

We may continue to communicate with an individual to provide important non-marketing information, such as service information.

**Research and analysis.** We may use personal information to conduct research and data analysis for the following purposes:

- To understand our customers' interests and priorities and adapt our offer;
- To improve or develop new services;
- Measure the effectiveness of our services, events, activities and marketing;
- Understand how visitors interact with our website and improve its performance;

We may use personal information for secondary purposes or any other purpose to which the individual has consented.

## **6. DISCLOSURE OF PERSONAL INFORMATION**

We will not disclose personal information to third parties without first obtaining consent, except as permitted or required by law or as necessary for the purposes identified at the time of collection.

We may disclose personal information to third parties for processing on our behalf. In such cases, we have entered into written contracts with these partners, which guarantee the protection of personal information.

## **7. THIRD PARTIES AND THIRD-PARTY WEBSITES; COOKIES AND OTHER TRACKING TECHNOLOGIES**

This Policy applies only to personal information collected, used, held, disclosed or otherwise processed by or on behalf of our organization. We may include links or plug-ins on our website to third-party sites or services that we do not control, for example links to Facebook, LinkedIn, Instagram or YouTube. These third-party organizations follow their own practices and we encourage individuals to consult their documentation in this regard.

We may access information about the use of these links and plug-ins. We may also obtain and use analytical and statistical information from third parties to help us measure the performance and effectiveness of the content we display. Please see our [Privacy Policy](#) for information on our use of cookies and other tracking technologies.

## **8. RETENTION OF PERSONAL INFORMATION**

Our physical files are generally kept at our head office at 7836, rue Jarry Est, Montréal, Qc, H1J 2A1. Electronic records are kept on servers and storage devices located in Canada.

Some of our service providers may access, use or store personal information outside the province or territory, or outside Canada.

If you have any further questions on this subject, please contact us at the e-mail address indicated in the “Handling procedure for requests and complaints” section of this Policy.

## **9. PROTECTION OF PERSONAL INFORMATION**

We endeavour to apply appropriate and necessary security measures to ensure the preservation of personal information placed under our protection. In doing so, we follow generally accepted industry standards.

For more information on our practices, as described below, or if you are concerned that personal information may have been compromised, please contact our Privacy Officer at the e-mail address indicated in the “Handling procedure for requests and complaints” section of this Policy.

### **9.1. We limit access to personal information**

We have defined the roles, responsibilities and access rights of our staff throughout the personal information handling cycle, from collection to destruction.

Our employees have access only to the personal information they need to perform their duties. They are responsible for the confidentiality of all personal information to which they have access. As a condition of employment, all employees are subject to confidentiality agreements, which remain in force if they leave our organization.

Employees who are exposed to or have access to personal information are expected to be familiar with our practices and to comply with this Policy and related documents. Supervisors have the additional responsibility of enforcing this policy. Our employees

are advised that failure to comply with this Policy or our practices may result in administrative, disciplinary or legal action.

## **9.2. We implement robust security measures**

We have implemented several types of measures to protect personal information against loss, theft and unauthorized access, use or disclosure. These measures are adapted to the volume and sensitivity of the information, the purposes for which it is used and the format in which it is kept or stored. These measures are as follows:

**Physical measures** such as the use of secure locks on filing cabinets and doors.

**Technological measures** such as encryption, firewalls, passwords, multi-factor authentication, anti-virus software and Secure Sockets Layer (SSL) technology to protect information transmitted over the Internet.

**Administrative and organizational measures** such as the adoption of practices and policies governing the protection of personal information throughout its life cycle, employee training in privacy, confidentiality and information security.

## **9.3. We limit the retention of personal information and destroy it securely.**

Unless a minimum retention period is required by applicable law, we will retain personal information only as long as necessary for the fulfillment of the purposes for which it was collected.

In many cases, even if an individual no longer has a relationship with us, we must retain his or her personal information for a certain period of time to meet our legal obligations. As long as we hold personal information, we continue to protect it and ensure its confidentiality.

Once the required retention period has elapsed, we permanently and securely destroy the personal information.

## **10. RIGHTS CONCERNING PERSONAL INFORMATION**

Subject to certain legal and contractual restrictions, any person whose personal information we hold has

- The right to access their personal information;
- The right to request correction of inaccurate information;
- The right to withdraw their consent;

- The right to request the deletion of their personal information;
- The right to have their e-mail address removed from our newsletter mailing list;
- Individuals may also ask us
- What personal information we collect from third parties;
- Who has access to it within our organization;
- How long we keep the information;

They may have other rights in relation to their personal information, such as the right to portability.

## **11. EXERCISING RIGHTS**

To exercise their rights, individuals should contact us at the e-mail address indicated in the “Handling procedure for requests and complaints” section. It is their responsibility to provide accurate, correct and complete information.

An individual may also contact our Privacy Officer with any questions regarding this policy and to file a complaint about it, as well as about our privacy practices in general. More information in the following section.

## **12. HANDLING PROCEDURE FOR REQUESTS AND COMPLAINTS**

### **12.1. Applicable procedure**

Any person wishing to make a request and/or complaint concerning the application of this policy or, more generally, concerning the protection of his or her personal information by our organization, must do so in writing to our Privacy Officer at the following e-mail address: [vieprivee@xpav.ca](mailto:vieprivee@xpav.ca).

They will be asked to provide their name, contact details, including a telephone number, as well as the subject and reasons for the request or complaint in sufficient detail to enable us to assess it. If the request or complaint is not sufficiently precise, we may request additional information deemed necessary to assess the complaint.

## **12.2. Processing requests and complaints**

We undertake to treat all complaints received confidentially.

Within 30 days of receipt of the inquiry or complaint or receipt of any additional information deemed necessary and required by our Privacy Officer to address the complaint, we will evaluate and provide a written response to the inquiry and/or complainant by email or otherwise if necessary. We will provide explanations, if necessary, particularly in the case of a refusal to grant a request for access, modification or destruction of personal information.

If the request and/or complaint cannot be processed within this timeframe, the persons concerned will be informed of the reasons for the extension, the status of the complaint and the reasonable time required to provide a response.

We keep a separate file for each inquiry and/or complaint received. Each file contains the request, the analysis and documentation supporting its assessment, as well as the response sent to the person who filed it.

You may also file a complaint with the Commission d'accès à l'information du Québec or any other privacy oversight body responsible for the application of the law concerned by the subject of the complaint. However, we invite any interested party to first contact our Privacy Officer and to wait until the processing is complete before contacting any privacy oversight body.

## **13. APPROVAL AND CONTACT**

This policy is approved by XPAV - Expert'Ease's Privacy Officer: [vieprivee@xpav.ca](mailto:vieprivee@xpav.ca)