

PRIVACY POLICY

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BACKGROUND

Les Productions Expert'Ease Inc (“**XPAV - Expert'Ease**”, “**Organization**”, “**Our**”, “**We**”, “**Us**”, “**Ours**”) is committed to protecting the personal information and privacy of its employees, customers, visitors and business partners (collectively and individually our “Users”). In the course of our activities and interactions with our Users, we collect, use and may disclose personal information. We do so in particular to provide our services, improve our offering, protect the rights and information of our organization and all our partners and for the other purposes set out in this Privacy Policy (the “**Policy**”).

The purpose of this Policy is to inform you about

- How we collect, use, store and disclose personal information;
- The policies and governance practices we have in place to protect such information; and
- Users' choices and rights regarding personal information;

If you have any questions, please contact us as indicated below. Our [Personal Information Governance Policy](#) describes in more detail some of our practices for managing and protecting personal information.

MANAGEMENT OF PERSONAL INFORMATION

What we consider to be personal information

Personal information is any information that makes it possible to identify a person or a user, directly or indirectly (for example, by associating it with other information).

Purposes for which we collect personal information

We collect personal information primarily to manage our business and provide our customers with the products and services they request. We may also use personal information for promotional purposes.

Information we collect, use and may disclose

Below is a summary of the categories of information we may collect. Some of this information may be considered personal information and some may be considered sensitive personal information.

- **Identifying information.** This includes name, e-mail address, telephone number, username and physical address.
- **Health information.** This includes, but is not limited to, birth, weight, gender and medical history.

- **Financial or payment information.** This information may include, but is not limited to, salary information, credit history, credit or debit cards, checks or payment accounts.
- **Demographic information.** This information may include age, ethnic origin, nationality, place of residence and any other demographic information the user may choose to provide.
- **Business information.** This information includes, but is not limited to, details of products or services purchased, preferred products or services and comments submitted.
- **Account information.** When an account is created on our websites, we collect the information provided to us to register the account, such as username, password and other account information.
- **Technical or technological information.** We may collect information about the device used to access our services, including Internet Protocol (IP) address and other related information, such as length of visit, type of browser and operating system used.
- **Browsing and usage information.** We may collect information about how users interact with our website, including what they see and the actions and steps they take when using our services. We may also track the pages and websites visited before and after the user visits our website.
- **On-site WIFI.** When accessing our on-site WIFI, we may collect information about the destination URLs a user visits when using our WIFI.
- **Video and audio recordings.** We may capture the image of a person or user using video surveillance services deployed in our offices, parking lots, warehouses and other facilities. We may make audio recordings of these individuals as they interact with our customer service associates.

How we collect information

We collect information directly from a user. Here are some examples of situations in which we collect information. This list is not exhaustive:

When a user uses one of our services. For example:

- When they ask a question via our website;
- When they purchase our services;
- When they share content on our website or as part of social media interactions on third-party websites such as Facebook, Twitter, Instagram, You Tube, etc. ;
- When they submit a job application;

Through cookies and similar technologies. We use cookies and similar technologies that may collect information when users visit our website. These technologies may enable identification, tracking and profiling.

We may also use the services of third parties (for example, web companies or social media platforms) that use certain technologies to analyze users' browsing behavior when they visit our website.

Here are some examples of the technologies we use:

- Functional, marketing and tracking cookies;
- Scripts;
- Web beacons.

If a user has consented to their use, we and/or our third-party partners may use non-essential cookies.

How to manage cookies. With the exception of strictly necessary cookies, we will not place cookies on devices without obtaining appropriate consent. At the end of each cookie's retention period, consent will again be required.

Users can delete or deactivate some of these cookies via their browser's cookie settings. Please note that disabling, blocking or deleting some of these technologies may affect the functionality of our website.

For more information on how to manage and/or deactivate non-essential cookies, please consult the following site

- <https://allaboutcookies.org/>
- <https://youradchoices.ca/> and
- <https://optout.aboutads.info/?c=3&lang=en>.

We collect information from other sources or third parties. In the course of providing our services and operating our business, we may collect information from various third parties. For example, we collect information from:

- Transportation or shipping companies;
- Marketing companies that help us understand consumer interests and trends;
- Social media platforms;
- Mailing service providers;
- Financial institutions and companies that help us process payments;
- Security and fraud prevention service providers;

Social media. When users access our content via websites, plug-ins and applications linked to social networks, they may allow us to access certain information relating to the accounts they use on these social media platforms (in particular, their name, username, e-mail address or telephone number). This depends in particular on the settings of the social media platforms. Their interactions with social media platforms are governed by their respective terms of service and privacy policies. We invite users to consult these documents. We are not responsible for the protection of information collected during users' interactions with third-party websites.

The information we collect from these sources may have been anonymized and does not identify users directly or indirectly.

Persons having access to the information.

Within our organization, the Human Resources and Accounting Divisions and their respective staff have access to personal information, as do the personnel responsible for providing our services to our customers.

Outside our organization, business partners and their respective personnel may have access to personal information.

WE RESPECT USER CONSENT

We will respect the purposes for which we have collected personal information. User consent is valid for as long as necessary to fulfill those purposes. If we wish to use or disclose personal information for other purposes, we will seek the user's consent, except as permitted by law.

WE MAY SHARE PERSONAL INFORMATION WITH OTHER INDIVIDUALS AND ORGANIZATIONS

Persons to whom we may disclose personal information.

We may disclose personal information to other persons or organizations if this is necessary to achieve the purposes for which it was collected or if we are authorized to do so by law. The type of information disclosed depends on the situation.

We may disclose personal information outside Quebec or your place of residence.

We use servers located in Canada, and personal information may be stored on servers located outside the user's country of residence.

Before we disclose any personal information, we take steps to protect it.

HOW WE PROTECT PERSONAL INFORMATION

We limit access to personal information

We have defined the roles and responsibilities of our employees throughout the personal information handling cycle, from collection to destruction. In particular, only those employees who need access to personal information to perform their duties are granted access, and they are required to comply with our confidentiality and security practices.

We implement robust security measures

We have implemented several 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 stored. They include physical, technological and organizational measures.

We encourage users to exercise caution when using the Internet, and to choose secure passwords where appropriate. Despite our best efforts, we cannot promise that use of our website or applications will be totally secure.

We destroy personal information once we have fulfilled our obligations.

We retain personal information for as long as necessary to fulfill the purposes for which it was collected. In all cases, we may be required to retain certain personal information to meet our legal obligations.

As long as we retain personal information, we continue to protect it and ensure its confidentiality. We destroy personal information permanently and securely.

USER'S RIGHTS

Withdrawal of consent

Individuals or users may request to withdraw their consent to the use, disclosure and retention of their personal information.

Withdrawal of consent may affect our ability to continue to provide the user with a service or product. In some cases, withdrawal of consent may not be possible where the use of the user's personal information is mandatory or necessary.

Other rights

Users have rights regarding their personal information. For example, they can request access to their personal information, correct it, update it or request its deletion.

We do our best to ensure that personal information is accurate, complete and up-to-date when we use it. We rely on the user to inform us of any changes to this information.

Steps in processing a request:

- Send a written request to our Privacy Officer. Contact details can be found at the end of this policy;
- We process all requests in accordance with the procedure set out in our [Personal Information Governance Policy](#), generally within 30 days of receipt;
- We will respond in writing by approving or refusing the request. Reasons for refusal will always be given.

QUESTIONS, COMPLAINTS OR COMMENTS?

We have appointed a Privacy Officer. This person ensures that we comply with the rules described in this policy and in the law. Users can contact our Privacy Officer at the following address: vieprivee@xpav.ca