

# Company Policy

**Last Updated:** January 17, 2024

## **Protection of Personal Information**

P.E.C. INC. (the "Company") recognizes the importance of protecting personal information and is concerned about how it handles such information. Therefore, it is committed to collecting, using, disclosing, and retaining only the personal information necessary for the conduct of its activities and within the scope of its business. The Company has adopted a policy on the protection of personal information, applies it in the course of its business, and has designated, in accordance with the Private Sector Privacy Law (the "LPRPSP"), an individual responsible for the protection of personal information and privacy within its company. The identity and contact information of this individual are provided at the end of this section.

## **When and How is Personal Information Collected?**

In the normal course of its activities and in the context of its business and service provision, the Company collects certain personal information necessary for these purposes or for any other compatible purpose if the criteria of the LPRPSP and other applicable laws and regulations regarding the protection of personal information are met (collectively referred to as the "Law"). Personal information may also be collected by the Company in the context of employment, customer knowledge, recovery, consultation, and business relationships. Personal information collected by the Company may include, but is not limited to, identity, contact information, health, social or family situation, employment, recruitment, financial information, training, or education of the individuals concerned, depending on the nature of the relationship between them and the Company. Pieces of identification containing personal information may also be collected by the Company. The necessity criterion guides the collection of personal information by the Company. The Company ensures that individuals concerned by this collected personal information consent to and are informed of this collection before it takes place. The Company also demonstrates transparency and takes measures to ensure that individuals concerned by the collected personal information understand the purposes of this collection. Unless an exception provided for by the Law applies, consents are free, clear, precise, explicit, informed, and presented distinctly if given in writing. If sensitive information is collected by the Company, the individuals concerned give express consent beforehand. It is possible that the Company collects personal information using technology that includes functions to identify, locate, or profile an individual. In such a case, consent in accordance with the Law will be requested from the individuals concerned. Information about the use of the Company's website and other technical information or about the interaction of the website visitor may be collected. A privacy policy is available to provide clear and simple information in this regard as well as regarding any collection of personal information via technological means.

In cases where personal information collected by the Company is communicated to it by a third party, that is, a person other than the one concerned by this information, the person making the

communication must ensure that they have obtained the consent of the person concerned and have informed them of this communication beforehand.

### **For What Purposes Are Personal Information Used?**

The personal information collected by the Company serves in the context of providing its services and, in some cases, to meet legal obligations arising, in particular, from the Law. Personal information collected by the Company may also be required to enable it to meet its contractual obligations to its customers and other third parties.

### **Under What Circumstances Can Personal Information Be Disclosed by the Company?**

The Company may disclose personal information it holds to third parties, including companies acting as subcontractors for it or as service providers. These third parties may, in some cases, be located outside the province of Quebec so that the personal information collected and held by the Company may be located in a jurisdiction with a legal regime different from that of Quebec. Contracts entered into by the Company with third parties require them to preserve the confidentiality of personal information and provide, in particular, for their obligation to comply with the legal framework applicable to the Company regarding the protection of personal information and privacy. Subject to an exception provided for by the Law, consent will be requested from individuals concerned by personal information if the Company were to disclose to third parties personal information that is not related to its current operations and activities or that is not compatible with the purposes for which it was collected. It is also possible that the Company may disclose certain personal information it holds in the context of a commercial transaction or in other cases provided for by the Law. In the event that the circumstances of the communication mean that the Company is not required to obtain the consent of the individuals concerned by the personal information, it will comply with the requirements of the Law to proceed with such communication. Additionally, the Company may be required to disclose certain personal information it holds to government authorities or agencies responsible for enforcing laws.

### **What Security Measures Does the Company Take Regarding the Personal Information it Holds?**

The Company implements policies and practices governing corporate governance and the protection of personal information. Personal information held by the Company is kept in secure locations, in accordance with generally recognized practices, and access to this information is limited to employees who need access to it in the performance of their duties. Employees of the Company are sensitized to the importance of protecting personal information and to the measures to be advocated to ensure compliance with the confidentiality of this information. In the performance of their duties, employees follow procedures that protect the confidentiality of personal information and promote best practices in this regard. The Company ensures the protection of personal information from the moment of its collection and implements security measures aimed at protecting it from unauthorized use in violation of current legislation, preventing accidental loss, alteration, disclosure, or unauthorized access, misuse, or any illegal form of use. However, the Company cannot guarantee that the personal information it collects is assuredly protected against any breach.

### **Where is Personal Information Collected by the Company Kept?**

The personal information of the Company may be held or transferred outside the province of Quebec, including to countries other than Canada, whose rules regarding the protection of personal information differ from those of Quebec and Canada. When information is outside Quebec or Canada, it is subject to the laws of the country in which it is located, and its collection, communication, use, and destruction may be carried out differently from provincial or federal requirements.

### **What is the Retention Period for Personal Information?**

Unless authorized or required by applicable laws, the Company retains personal information only for the time necessary to achieve the purposes for which it was collected, including for the purpose of meeting ethical, legal, tax, accounting, or notice requirements to appropriate government agencies. At the end of the retention period, personal information is destroyed, deleted, or anonymized. Anonymized information no longer allows, in an irreversible manner, the identification of the person concerned. In the event of a privacy incident involving personal information, the Company follows the provisions of the applicable law and takes reasonable measures to mitigate the risks that harm may be caused to individuals concerned by the personal information affected by the incident.

### **Privacy-Related Complaint**

A person who believes that their own personal information or that of another person has been:

- Accessed without authorization by the Law;
- Used without authorization by the Law;
- Communicated without authorization by the Law;
- Lost or otherwise compromised in terms of the protections provided by the Law,

is invited to submit their complaint in writing to the Personal Information Protection Officer identified below. The complaint must include relevant details, namely the personal information concerned, the context, the potential or actual prejudice suffered or that may be suffered, as well as relevant dates. The details of the reported incident must be described as precisely as possible so that intervention can be carried out quickly. Any employee who receives a complaint knows they must forward it to the Personal Information Protection Officer upon receipt. Upon receipt of a complaint, the Company follows its internal Complaint Handling Procedure to address the complaint fairly.

### **Personal Information Protection Officer**

For any questions or comments regarding how the Company handles personal information throughout its lifecycle within the Company or if you wish to assert your rights under the Law regarding the protection of personal information, you can contact the Personal Information Protection Officer at the Company:

- **Mathieu Giroux**  
LES ENTREPRISES P.E.C. INC.  
152A, Chemin de St-Edgar  
New Richmond (Québec) G0C 2B0

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