

## **POLICY AND PRACTICES REGARDING THE PROTECTION OF PERSONAL INFORMATION**

### **1) INTRODUCTION**

TECHMIRE assigns the greatest importance to privacy and the way in which personal information collected and used in the course of its activities is protected.

In order to fulfill its obligation in this matter and to comply, in particular, with the requirements of the Act respecting the protection of personal information in the private sector, chapter P-39.1 (hereinafter «LPRPSP»), TECHMIRE has adopted this policy which describes the rules that the company applies when collecting, using, disclosing, retaining or destroying personal information, as well as the complaint procedure in the event of non-compliance with this policy.

### **2) PERSONAL INFORMATION**

The notion of “personal information” for the purposes of this policy is defined as any information which concerns a natural person and allows them to be identified directly or indirectly.

However, the provisions of this policy relating to the collection, use, disclosure, retention, and destruction of personal information do not apply to information which concerns the exercise by an individual of a function within a company, such as its name, title and function, as well as the address, email address and telephone number of its place of work.

### **3) COLLECTION, USE, DISCLOSURE, RETENTION AND DESTRUCTION OF PERSONAL INFORMATION**

TECHMIRE only collects the personal information necessary to carry out its activities. The purposes for which personal information is collected by TECHMIRE are generally for the creation of an employee file, the administration of payroll and employee benefits, the administration of the Company’s human resources, as well as to comply with legal requirements (for example tax purposes).

The personal information is collected from the person concerned, who is notably informed of the purposes of the collection, their rights of access and rectification provided for by law and their right to withdraw their consent to communication or use of the information collected.

By providing personal information in this way, the person concerned consents to its use and communication for the purposes for which this information was collected.

The consent of the person concerned must be free and clear and it is only valid only for the time necessary to achieve the purposes for which it was granted.

TECHMIRE uses personal information only for the specific purposes for which such information was collected. For personal information to be used for other purposes, the person concerned must first be

informed of the new purposes and their consent must be obtained. Personal information may be communicated to third parties when the person concerned consents.

Access to personal information held by TECHMIRE is limited to authorized persons only who need it to carry out their duties within the company. These people are subject to a confidentiality agreement.

TECHMIRE takes reasonable measures to ensure the security and confidentiality of the personal information it holds, in particular by material, technological or organizational means. It ensures that the personal information it holds is up to date and accurate at the time of its use.

TECHMIRE may communicate personal information to third party service providers when necessary to fulfill the purposes for which this information was collected. In this case, the company on one hand informs the person concerned of the possibility of their personal information being communicated, and on the other hand, takes contractual arrangements to ensure compliance by its supplier with confidentiality of the personal information communicated, its use only for the purposes of providing the service and its retention only for the duration of the contract.

Notwithstanding all the preceding provisions, TECHMIRE may collect, use, disclose or retain personal information without the consent of the person concerned when required or authorized by law.

When the purposes for which personal information was collected are accomplished and it is no longer relevant to keep it, TECHMIRE takes the necessary measures to destroy it confidentially and securely or to make it anonymous.

#### 4) PRIVACY INCIDENT

Access, use or disclosure not authorized by law, loss or any other breach of the protection of personal information constitutes a confidentiality incident.

Any suspected or proven confidentiality incident must be reported immediately to the person responsible for personal information at TECHMIRE.

When TECHMIRE has reasonable grounds to believe that a confidentiality incident involving personal information that it holds has occurred, it takes reasonable corrective and preventive measures to reduce the risk of harm being caused, on one hand, and to prevent other incidents of this nature from occurring in the future, on the other hand.

If the confidentiality incident that occurs results in risk of serious harm, TECHMIRE promptly notifies in writing the Commission d'accès à l'information and the person whose personal information is affected by the incident.

In assessing the risk of harm, TECHMIRE considers particularly the sensitive nature of the information concerned, the anticipated consequences of its use and the probability that it will be used for harmful purposes.

TECHMIRE maintains up-to-date records of confidentiality incidents and sends copy to Commission d'accès à l'information upon request.

## 5) RIGHTS OF ACCESS AND RECTIFICATION OF THE PERSON CONCERNED BY THE PERSONAL INFORMATION HELD BY THE COMPANY

The person concerned by the personal information held by TECHMIRE has the following rights :

- Right to access to personal information that TECHMIRE holds and to obtain a copy ;
- Right to rectify personal information that TECHMIRE holds and it is inaccurate, incomplete or ambiguous.

Any request for access or rectification of personal information must be made in writing and addressed to the person responsible for personal information within TECHMIRE, who must respond in writing, diligently, at the latest within 30 days of having taken note of the request for access or rectification.

The refusal to grant a request must be reasoned and indicate the legal provision justifying the refusal, as well as the remedies under LPRPSP available to the applicant and the time limit for exercising them.

## 6) RESPONSIBLE FOR THE PROTECTION OF PERSONAL INFORMATION WITHIN THE COMPANY

The person responsible for the protection of personal information within TECHMIRE approves the policy governing the protection of personal information and ensures its compliance and implementation.

The title and contact details of the person responsible for the protection of personal information within TECHMIRE are as follows :

Title : General Manager  
Address : 185 Voyageur, Pointe-Claire, Quebec, Canada H9R 6B2  
Phone : 514-694-4110 – Ext. 235  
E-mail : PRPR@techmire.com

## 7) COMPLAINTS :

Any complaint concerning non-compliance with this policy governing the protection of personal information is sent in writing to the person responsible for the protection of personal information within TECHMIRE.

TECHMIRE takes note of the complaint diligently, investigates and responds in writing. If the complaint is considered founded, TECHMIRE takes appropriate measures to resolve the problem raised in the complaint, to ensure the protection of the personal information in question and to prevent another similar incident from occurring in the future, if applicable.

#### 8) COMMUNICATION OF THIS POLICY

This policy is posted in the TECHMIRE website, presented to the TECHMIRE employees and made available to them for consultation in the workplace, in the Employees Manual.

#### 9) APPROVAL AND POLICY UPDATE

This policy has been approved by the person responsible for the protection of personal information within TECHMIRE and may be updated as necessary, with the latter's approval.

This policy is updated and subject to new approval upon any substantial or regulatory change.

**Updated** : September 20th, 2023