

# CORPORATE POLICY

## Privacy and Confidentiality Policy



**NUMBER:**

**DATE EFFECTIVE:** September 22, 2023

**PERSON IN CHARGE:** Caroline Huot

**APPROVED BY:** Catherine Morneau

Signature

### 1. OBJECTIVE

The objective of this policy is to regulate the manner in which Groupe Morneau collects, uses, saves, and discloses collected personal information.

Groupe Morneau is committed to taking all necessary measures in order to protect personal information handled by them, which can be used to personally identify an individual, doing so by means of appropriate technology and mechanisms.

### 2. SCOPE OF APPLICATION

This policy applies to personal information covered by Provincial and Federal Regulations, to which Groupe Morneau must comply.

### 3. DEFINITIONS

**The following definitions apply in this policy:**

- 3.1. **"Collection"** means the action of collecting, acquiring, or obtaining personal information in any possible manner, including through a third party;
- 3.2. **"Consent"** means a free agreement to collect, use, and/or disclose personal information for the purposes identified by Groupe Morneau. Consent may be explicit or implicit and may be given directly by the natural person or their authorized representative. It must be unequivocal;
- 3.3. **"Disclosure"** means the action of revealing personal information to a third party;
- 3.4. **"Groupe Morneau"** means the Denis Morneau (1993) inc. Business Corporation, its subsidiaries, and affiliated companies;
- 3.5. **"Personal Information"** means any information that concerns a natural person and allows that person, either directly or indirectly, to be identified;
- 3.6. **"Sensitive Information"** means any information, although not enabling identification of a natural person, could harm them if the said information were disclosed;
- 3.7. **"Person in charge of the protection of personal information"** means the person within Groupe Morneau responsible for overseeing that this policy is respected and applied;
- 3.8 **"Use"** means processing, handling, and managing personal information by Groupe Morneau or its authorized representatives.

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### 4. RESPONSIBILITIES

- 4.1 Groupe Morneau is responsible for personal information under its control and must designate a person in charge of the protection of personal information, whose responsibility it is to ensure that the principles outlined in this policy are respected.
- 4.2 The person in charge of the protection of personal information is responsible for the application of this policy. Other employees or authorized representatives of Groupe Morneau may be designated to support the person in charge of the protection of personal information or to look after the daily gathering, use, disclosure, or processing of personal information.
- 4.3 Upon request, Groupe Morneau will communicate the contact information of the person in charge of the protection of personal information, which may be found below. This same information is also available on the Groupe Morneau website.
- 4.4 Groupe Morneau is accountable for personal information in its possession or control, including personal information entrusted to a third party for processing purposes.
- 4.5 Groupe Morneau takes all necessary measures to evaluate risks respecting privacy in connection with any proposed acquisition, systems development and redesign, or electronic service delivery involving collection, use, disclosure, storage, or disposal of personal information.
- 4.6 Groupe Morneau has a system for anonymization and disposal of personal information in place, in compliance with its legal obligations.

### 5. INFORMATION AND PROCESSING

- 5.1 Any person having a relationship with Groupe Morneau and who shares their personal information, consents to allowing Groupe Morneau to collect, use, and save this information for the purpose it was provided.
- 5.2 Groupe Morneau can collect personal and/or sensitive information from their customers, suppliers, employees, and any individual submitting an employment application. Types of information collected are as follows:
  - a) Last name, first name, date of birth, driver's license number, social insurance number, portrait photographs, phone number, home address, mailing address, email address, biometric data, work experience, education, civil status, people living under the same roof, credit card information, banking details, medical files, medical expertise.

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5.3 Groupe Morneau collects personal information in the following situations:

- a) When an individual is submitting an employment application at Groupe Morneau;
- b) When an individual is employed by Groupe Morneau;
- c) When an individual is enrolled, as an employee, for group insurance coverage offered by Groupe Morneau;
- d) When an individual contributes to a pension plan offered by Groupe Morneau;
- e) When an individual does business or wishes to do business with Groupe Morneau;
- f) When an individual participates in an activity or contest organized by Groupe Morneau;
- g) When an individual visits the website, a secure portal, or an application deployed for the Groupe Morneau account;
- h) For all other purposes associated with the proper governance and promotion of business activities of Groupe Morneau.

5.4 Any individual may refuse to share information, however, this may prevent them from having access to certain services or benefits offered by Groupe Morneau.

5.5 Groupe Morneau may provide information, personally identifying a person, to authorized service suppliers who collaborate in providing services or work on behalf of Groupe Morneau. These suppliers are not authorized to use personal information for any other purposes.

5.6 Groupe Morneau could be compelled to disclose personal information in their possession when required to do so by the law or a court order.

5.7 Groupe Morneau may have to disclose personal information in their possession following a request from law enforcement agencies or other public agencies, as well as to prevent a criminal offence.

5.8 Groupe Morneau may disclose personal information in the case of a transfer of assets or a transfer of property in the framework of a proposed or real corporation reorganization, such as a merger or an acquisition, within the limits stipulated by the law. Assuming that such a reorganization, merger, or acquisition were to take place, Groupe Morneau would use or communicate personal information within the framework of its activities, in keeping with the present policy. In this case, Groupe Morneau will ensure that the receiver of the personal information signs a confidentiality agreement in relation to this information.

5.9 Groupe Morneau may communicate personal information to collect a debt due to them.

5.10 Groupe Morneau may use or communicate information with a view to preventing fraud or improving security measures.

5.11 Groupe Morneau may use information for study or statistical purposes.

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### 6. ACCESS, COMPLAINTS, AND COMMENTS

6.1. Any individual may submit in writing a request to the person in charge of the protection of personal information in order to:

- a) Obtain a copy of the file containing their personal information;
- b) File a complaint related to the protection of personal information;
- c) Submit comments related to the protection of personal information;
- d) Have erroneous personal information corrected;
- e) Withdraw their consent to collect, use, or process their personal information.

6.2. The person in charge of the protection of personal information can be contacted at the addresses below for the purposes mentioned in the preceding article:

- a) [protectionrenseignements@groupemorneau.com](mailto:protectionrenseignements@groupemorneau.com)
- b) Groupe Morneau  
C/O Person in charge of the protection of personal information  
40, rue Principale  
St-Arsène (Qc) G0L2K0

6.3. Groupe Morneau agrees to diligently respond to any request enumerated in point 6.1, within a maximum time period of 30 days.

6.4. Groupe Morneau does not charge to have access to personal information in their possession, however, certain fees may be requested to reproduce, transmit, or transcribe personal information.

6.5. Groupe Morneau may refuse to communicate personal information when doing so could harm Groupe Morneau or a third party or if it is against the law. If need be, the refusal will be justified in writing.

6.6. Any individual whose request has been refused by Groupe Morneau may approach a competent governmental authority and request a review of the decision. According to the case and the jurisdiction involved, the refusal letter will indicate the name and contact information of the competent governmental authority.

### 7. EFFECTIVE AND UPDATED

This policy may at times be modified without prior notice. Any individual may obtain an updated version of the policy by communicating with the person in charge of the protection of personal information. This policy is effective September 22, 2023.