Privacy Policy

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1. Purpose of the Privacy Policy in relation to Law 25

The personal information (hereinafter referred to as "information") you provide us is essential for a business relationship with you. We understand that this information is private, and we are committed to protect it as required by law. This policy describes our practices for protecting your rights and privacy and applies to the use and disclosure of any information collected. This policy as long as we retain your information, including after the end of our business relationship.

2. Definition

Under PIPEDA, personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- age, name, ID numbers, income, ethnic origin, or blood type;
- opinions, evaluations, comments, social status, or disciplinary actions; and
- employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs).

https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronicdocuments-act-pipeda/pipeda_brief/#_h2

Personal information is any information which relates to a natural person and directly or indirectly allows that person to be identified

https://www.legisquebec.gouv.qc.ca/en/document/cs/p-39.1

Our privacy and data protection officer is responsible for these practices within our company. If you have any questions about this policy, you can contact the data collection officer at one of the following addresses: <u>comptabilite@serrurierclement.com</u>

Sécurité Serrurier Clément Inc. Accounting 86 Alexandre Street Salaberry-de-Valleyfield, QC, J6S 3J9

3. What type of information we may collect and from whom

3.1. What information can we collect?

Identification information of our customers

- Name, first name
- Contact information: postal address, phone number (personal and emergency contacts), email address.

IMPORTANT: We limit the collection of your information to what is necessary to assist us in serving you properly.

4. How we use and disclose your information and with whom

4.1. How we use and disclose your information

We use and disclose your information to:

- a. Identify you, update your information.
- b. Establish, manage, administer, and maintain requested products and services.
- c. Conduct our day-to-day activities and operations in collaboration with alarm centers.
- d. Communicate with you using the contact information you provided (by mail, email, text messages, calls)

4.2. To whom do we disclose your information?

To alarm center service providers who communicate with emergency services as needed.

4.3. Service providers What information do we communicate to alarm centers?

- Name, first name
- Contact information: postal address, phone number (personal and emergency contacts), email address.

5. When we need to obtain your consent?

We only use your information with your consent or as permitted by law (verbal and/or written). Your membership with the alarm center service authorizes us to share your information with them.

6. What are your rights and how to exercise them?

6.1. Right to accept or refuse to provide your information.

Your information belongs to you. Subject to legal, business, or contractual requirements, you have the right to withdraw your consent for the collection, use, or disclosure of information. We will process your request promptly.

However, some informations are essential for us to provide certain products and services. If you refuse to provide them, it may be difficult, if not impossible, to establish, maintain a business relationship with you, or offer you certain products.

6.2. Right to access your information.

You can request to review the information we hold about you unless the law provides limitations on such requests.

How to access your information?

To access your information, you must make a request by meail to the data collection officer or by mail to the provided postal address. We will process your request within 30 days. We will inform you if the period is longer than 30 days.

6.3. Right to correct your information.

You can and should correct inaccurate information about you. To provide you with quality service, it is essential that your information is accurate and complete. To do so, we rely on you to help us maintain the quality of the information we hold by informing us of any changes. To make a request, email or write to the provided email or postal address.

7. What security measures we take to safeguard your information?

7.1. Limited retention

We keep your information, whether in physical or digital format, for as long as necessary to achieve the purposes for which the information was collected or as required or permitted by law. The purpose, nature, and sensitivity of the information are considered in determining the retention periods.

7.2. Storage locations

Secure websites with restricted access limited to personnel in charge of alarm center. Private accounting software with data accessible to a limited group of people in need of the information for their work.

7.3. Information security program

We make significant efforts to protect your information against loss, theft, unauthorized access, use, or disclosure, and against any other breach of the protection of such information. We have implemented a security program to monitor the ever-evolving threats to information security. Measures adopted in our security program include:

- Protecting infrastructure through secure access to our premises and secure locations for our equipment, etc.
- Limiting the individuals with access to your information. Only employees who need to access your information as part of their work have access.

8. How we can change this policy?

We may change this policy as needed. We will inform you through a notice on our website and by any other appropriate means to reach you.

9. How to contact us with questions, comments, or complaints?

To ask a question or send a comment, you can contact us by:

- Sending an email to comptabilite@serrurierclement.com
- Calling our store at 450-373-3075 and asking to speak with the accounting department.
- Writing to us at:

Serrurier Clément Inc. Accounting 86 Alexandre Street Salaberry-De-Valleyfield, QC, J6S3J9 Data collection officer: Sylvie-Anne Giroux-Tremblay <u>comptabilite@serrurierclement.com</u>