



Public broadcasting

PRIVACY POLICY

*PORTAGE CORPORATE GROUP PERSONAL INFORMATION
PROTECTION POLICY*

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By the COO

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Opinions

By browsing our websites or using our products, you acknowledge that you have read and understood this Policy and consent to the processing of your personal information in accordance with this Policy, where applicable.

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1 Purpose and Scope

Portage CyberTech Inc. and all its affiliates including 10084182 Canada Inc. O/A Becker-Carroll, Vivvo, Solutions Notarius Inc., 1CRM and OPIN Digital, hereinafter referred to as the "Group", are committed to protecting the personal information they collect, use and retain.

We understand the importance you place on protecting your privacy, and we are committed to maintaining the confidentiality of the Personal Information we collect about you in the course of our business in accordance with applicable laws. As such, the Group is a "data controller". This means that we collect Personal Information directly from you and that we determine the purpose and means of "processing" this Personal Information.

"Processing" is a broad term that means the collection, use, storage, transfer or other action related to your Personal Information; it is used in this Policy in this manner.

It is our responsibility to ensure that any Personal Information collected will be handled securely. Our Privacy informs you Policy of our practices in this area. It explains why we collect it, how we handle it and how we protect it. This Policy applies for as long as we hold your information, including after the end of our business relationship.

Please note that this Privacy Policy also applies to the Personal Information of our employees and other persons or organizations having a business relationship with the Group

THIS PRIVACY POLICY SUPPLEMENTS THE TERMS OF USE OF OUR PRODUCTS AND THE CODE OF ETHICS AND CONDUCT OF THE GROUP, WHERE APPLICABLE.

Our CEO is our Chief Privacy Officer (hereinafter "CPO"), responsible for ensuring compliance and implementation of legal requirements and compliance with this Policy. If you have any questions about this Policy, you may contact him at the address indicated in the section of 10the document.

2 Definition of Personal Information

In Quebec, under terms of *the Act to modernize legislative provisions respecting the protection of personal information (LQ 2021, c25)*, personal information is now: "*Any information that relates to a natural person and allows that person to be identified*".

Personal information may, alone or in combination with other information, directly or indirectly allow you to be identified. It is possible that some of the Information that we classify as Personal Information for the purposes of this Policy may not be protected by applicable laws, in which case you may not have the same rights with respect to it.

Personal Information may include information collected about you using cookies or other technologies. Cookies are small pieces of information stored in a browser or device when you visit a Web site, which remember your preferences or information about you.

We are responsible for Personal Information in our possession or custody, as well as for Personal Information transferred to a third party for processing. Wherever possible, we will anonymize, pseudonymize and/or aggregate these so that they no longer identify an individual.

Our Chief Privacy Officer (CPO) is responsible for ensuring that we comply with this Policy and applicable privacy laws.

3 Collection, Use, Disclosure and Retention of Personal Information

The Group limits the Personal Information it collects to that which it needs for the defined purposes and uses it only for those purposes. If we want to use your personal information for another purpose, we will describe the intended use and again ask for your express prior consent.

The Group will not use Personal Information for purposes other than those for which it was collected, except with the Data Subject's consent renewed, unless:

- a) legal, medical or safety reasons prevent consent; or
- b) The Group is authorized or required to do so under applicable law.

If a purchaser decides to proceed with the purchase of products on one of the Group's websites for a future Owner or Customer, the Personal Information collected by the purchaser must have been collected by lawful means and solely for the purposes identified prior to collection. The Holder or Customer must have given his or her prior consent. Such consent must be expressly given in the case of sensitive Personal Information.

In general, if you provide us with Personal Information about anyone other than yourself, as such your employees, third parties, advisors or suppliers, you must ensure that they understand how their will be used Personal Information, and that they have given you permission to disclose it to us and to allow us and our suppliers to use it.

Your information belongs to you. Subject to requirements legal, commercial or contractual, you have the right to withdraw your consent to the collection, use or disclosure of Information. We will process your request as soon as possible. However, certain information is essential for us to provide you with certain products and services. If you refuse to provide it, it may be difficult, if not impossible, to have a business relationship with you or even to offer you some of our products.

3.1 Examples of Personal Information we may collect

We collect information that is sent to us voluntarily, through the interface of our Web sites (e.g. by filling out a form) or otherwise (e.g. by e-mail, when you contact our customer service department or during surveys).

The types of Personal Information we may collect time to time may include:

- your last name
- first name
- contact information including mailing address, telephone number or personal e-mail address
- date of birth
- profession
- professional membership number
- photography
- Any information transmitted to the Group via our Web sites, e-mail, telephone, chat or during the identity verification process.

and any other Information Personally Identifiable ("Personal Information").

3.2 How we collect your Personal Information

We may collect information from your mobile and online activities, such as Internet Protocol addresses (IP addresses) to determine your geographic location, mobile device identification numbers, the name of your cellular service provider, and information about your use of the site, applications and websites.

We use cookies (small files that a site server Web uploads to your computer) on our site Web to collect information about your online behavior. You can set your browser to refuse these files, but this may affect our ability to personalize or test your online experience. For example, they allow us to remember certain elements, such as your preferred language.

We may collect the Personal Information you provide to us when you visit our website or use our applications, sign up for a request one of our products, interact with us through social media or online advertisements, participate in surveys, or engage with us in any way.

The Group takes great care to preserve the confidentiality of the Personal Information of users who visit its websites (notably portagecybertech.com; 1crm.com; notarius.com, consignocloud.com, consigno.com and verifio.com for Canada only). For this reason, although the servers that host these sites identify the Internet Protocol (IP) address of your connection, the information that may be transmitted between computers in order to conduct site operations does not identify you personally.

Personal Information may be collected from our websites if:

- You voluntarily to a subscribe specific that requires you to. product or service provide such information
- You fill in a support or information request form on one of our sites
- As the holder of a digital signature certificate, you have access to one of the functionalities of your online account (self-service).

Such Information may also be collected on an as-needed basis by our employees or our supplier when, for example, you proceed with the verification of your identity or communicate with our customer by telephone or chat, as the case may be.

We have implemented strict technical and organizational procedures to ensure that, by default, we only process Personal Information that is necessary for each specific purpose of processing. These procedures prevent the loss of or unauthorized use or access of Personal Information.

The Group collects Personal Information only if you voluntarily choose to provide it.

Mailing Lists and E-mails:

The Group uses various tools to manage its mailing lists and send various e-mails (collectively the "Messaging Service Providers") to its customers and prospects. Personal Information is transferred to the Messaging Service Providers in order to manage the mailing lists and to properly send e-mails as required. Your Personal Information is used solely for the purpose of sending e-mails; Messaging Service Providers do not use Personal Information for any other purpose and do not transfer or sell your Personal Information to any other third party.

You can unsubscribe from mailing lists the 's Group at any time (opt-out) by following the link at the bottom of the e-mails Group's.

The practices Group's email is designed to comply with anti-spam laws, including, but not limited to, Canada's Anti-Spam Act (S.C. 2010, c. 23). If you believe that you have received an e-mail in violation of these laws, please contact our Privacy Officer using the contact information below.

3.3 How we use your Personal Information

The Group collects only the Personal Information necessary to offer you the products you have purchased and to improve them if necessary. The Group may, however, use your Personal Information to meet its obligations legal.

We may use Personal Information in any of the ways set out below, with your consent or, where applicable, under another legal basis. In each case, we indicate the purposes for which we use your Personal Information:

- In order to provide our services as well as for the conduct of our business, to administer and perform our services, including to perform our obligations arising from any agreement between you and us. For example:
 - Create and maintain your customer account;
 - Verify your identity ;
 - Provide the product, service or information you requested;
 - Notify us of updates, interventions or renewals of your digital signature certificates;
 - Providing customer service ;
 - To send you information about products and services you request and to respond to your requests and questions.
- To respond to inquiries or other requests from visitors to our Web sites.
- In order to facilitate the use of our websites and to ensure that the content is relevant, and to ensure that the content of our websites is presented in the most effective manner for you and your device.
- For marketing purposes (informing you of new offers and promotions) and business development - to provide details of new services, information on product developments and invitations to seminars, demonstrations and events where a person has opted to receive such information. You may request that this service cease at any time.
- For research and development purposes (including security) - to perform analyses to better understand our customers' requirements service and marketing and to better understand our business and develop our services and offerings. You may unsubscribe at any time.
- Recruitment purposes - to enable us to process job applications and assess whether an individual meets the requirements of the position for which he or she may apply to the Group.
- To meet our legal, regulatory or risk management obligations.
- To ensure we get paid - to collect payments owed to us and, where appropriate, to enforce such collections through debt collection agencies or other legal means (including legal proceedings).
- In order to reorganize or change our business - if we undertake a reorganization (for example, by merging, consolidating or disposing of part of our business), we may need to transfer some or all of the Personal Information to an applicable third party (or its advisors) as part of any

due diligence process or transfer to such reorganized entity or third party for the same purposes as set out in this Policy or for the purposes of analyzing any proposed reorganization.

3.4 To whom we may communicate your Personal Information

We may share your Personal Information within the Company's Group companies to facilitate the relationship and simplify the interactions we have with you & with our service providers. We may also disclose them to meet a legal obligation or to enforce our rights. Under no circumstances will Personal Information collected by the Group be sold to other persons or organizations.

We may also share Personal Information with certain third parties, including the following:

- third-party service providers and/or partners who provide us with website services, application development, hosting, maintenance and other services. These third parties may access or process connection with the services they provide to us. We limit the Personal Information in Personal Information we provide to these service providers to that which is reasonably necessary for them to perform their functions. We invite you to consult the privacy policies of these suppliers.
- government authorities and law enforcement agencies where required by applicable law. More specifically, we may disclose Personal Information and other information if we are required to do so by law or if we believe in good faith that such disclosure is necessary to comply with applicable laws, in response to a court order or subpoena or government search warrant, or otherwise to cooperate with such government authorities and law enforcement agencies.
- The purchaser, successor or assignee in connection with any merger, acquisition, debt financing, asset sale or similar transaction, and in the event of any insolvency, bankruptcy or receivership involving the transfer of to one or more third parties. Personal Information as a business asset

We will use only your Personal Information for the primary purpose and applicable legitimate purpose for which it was collected, or for purposes consistent with that primary purpose.

3.5 How long do we keep your Personal Information

The Group retains the Personal Information it collects for as long as it is necessary for the conduct of its business and for the fulfillment of the identified purposes, as long as it is reasonable to do so for customer service, legal or commercial purposes. The length of retention depends on the product, service and nature of the Personal Information. At the end of this period, Personal Information will be destroyed, erased or depersonalized. The Group makes no commitment to retain the Information collected for a specific period of time except where required by applicable law or regulation.

Depending on whether or not you are one of our customers, your Personal Information may be stored on our servers located in Quebec or with some of our service providers outside Quebec. For example, when a potential customer completes an online sales request on our website, we deal with an external service provider who stores this Personal Information outside Quebec. At the same time, we take steps (privacy impact assessments or risk assessments) to ensure that such external service providers have security measures in place to reasonably protect the Personal Information they collect. More broadly, Portage sometimes uses specialized providers to host certain platforms. When these providers process personal information on our behalf, we ensure that they comply with the requirements of Law 25, including: Data hosting in Canada, unless an exception has been duly assessed; Contractual clauses governing remote access (e.g., technical support); Commitments regarding security, confidentiality, and incident notification. Selected providers undergo a rigorous assessment by our security and compliance team.

When you provide us with your Personal Information in order to apply for an employment opportunity, including but not limited to your curriculum vitae, we will treat such Personal Information on a confidential basis and use such information solely (i) to evaluate your candidacy for current or future employment opportunities and (ii) to contact you regarding such employment opportunities. We will preserve your Personal Information for future employment opportunities within the Group that may arise unless you inform us not to preserve your information. If you choose to voluntarily transmit to us your Personal Information by e-mail or by means of an unsecured digital form, please be aware that, at the time of transmission, we cannot guarantee its protection, integrity or confidentiality. When you verify your identity face-to-face with an agent, or directly online by downloading our identity verification application, using our point-to-point security videoconferencing service, or from a camera-equipped smartphone or webcam-equipped computer, we will treat such Personal Information as confidential and use it only for the purposes for which it is intended. Recordings and images collected in this way are encrypted, stored in a restricted-access environment accessible only to a group of defined people, and kept in accordance with our internal retention schedule.

When you speak with our agent's customer over the telephone, your calls may be recorded and monitored for quality assurance and training purposes. We will treat any support Personal Information you may give us during a call on a confidential basis and use it only for the purposes for which it is intended. It is important to note that some calls may be used as evidence, for example, in access to information requests by the Syndic of the Holder's professional order.

4 Consent

We use your Information only with your consent or as permitted by law. In compliance with the law applicable in Quebec, your consent must be manifest, free, informed and given for specific purposes. Your consent will be requested for each of these purposes, in clear and simple terms. Your consent will be valid only for the time required to achieve the purposes for which it was requested. We

undertake to therefore obtain your consent prior to collecting your Personal Information when required by law. Such consent may be express or implied and may be provided directly by the individual or by his or her authorized representative.

We prefer to obtain express consent, whether verbally, electronically or in writing. However, implied consent may be reasonably inferred from a person's action or inaction. For example, providing a name and address to receive a publication or a name and telephone number to obtain an answer to a question is considered implied consent to the collection of information containing Personal Information. In determining the appropriate type of consent, we take into account the sensitivity of the Personal Information involved, the purposes for which it is collected and the reasonable expectations of a similarly situated individual. When request for consent is your made in writing, it will be presented separately from any other information you may receive. By applying for a product, contacting us or otherwise providing us with Personal Information, you acknowledge that you consent to the collection, use and disclosure of your Personal Information as described in this Policy and applicable laws

You be asked for on one or more occasions during the identity verification process, and in various forms, such as a checkbox or a recorded oral statement may consent

When you provide us with Personal Information about another person, we assume that you have obtained that person's valid consent to allow us to collect, use and disclose that information in accordance with this Privacy Policy. Subject to legal and contractual restrictions, you may suspend or withdraw your consent to the collection, use and disclosure of your Personal Information. However, depending on the circumstances, withdrawing your consent in its entirety may prevent us from continuing to provide you with the products and services you have requested.

5 Protecting Your Privacy

The Group uses procedures and practices appropriate to the level of confidentiality of Personal Information to prevent loss, theft and unauthorized access. Access to your Information is limited to those persons and parties who need it. Although it is impossible to guarantee 100% protection, the Group has adopted rigorous methods that meet strict security standards to ensure the protection of personal information.

For example, we use physical safeguards (such as restricted access to our offices and secure storage spaces), electronic safeguards (such as passwords and encryption) and secure business practices (such as customer authentication on telephone calls). We also train our staff on how to protect Personal Information at dedicated compliance or security awareness workshops. Despite the Groups' efforts and protective measures, complete confidentiality and security cannot yet be guaranteed over the Internet. Any unencrypted electronic communication transmitted over the Internet is neither

secure nor confidential, and is subject to possible interception, loss or alteration. You acknowledge that such communications are at your own risk.

6 Information Collected Automatically

The Group automatically collects certain information using "Analytics Programs Third Party " Google Analytics and HubSpot for example to help us better understand visitors and how they use our Websites, but none of this information identifies you personally, except by an alphanumeric string. For example, each time you visit our Website, we automatically collect (where applicable) your IP address, browser and computer/device type, access times, the page web you came from, the page(s) web or content you access, and other related information. We use the information collected in this way solely to better understand your needs and those of visitors and users of the Websites as a whole. The Group also uses the information collected for statistical purposes to track the number of visits to the Websites, specific pages of the Websites and users in order to make improvements to the Websites and our marketing activities. Your IP address and other relevant information that we collect using Analysis Programs third-party may be used to trace any fraudulent or criminal activity, or any activity in violation of the terms of use of the Group's Web Sites.

6.1 Cookies

Although you can visit our Web site without revealing any Personal Information about yourself, when you access our Web an exchange of information takes place automatically between your computer and sites our Sites. This exchange of information does not allow the Group to identify you personally or to know your name or e-mail address. However, as indicated above, this exchange of information enables the Group to obtain your IP address, the type of browser and operating system used, the date and time you accessed the site, the pages visited and, the address if applicable, of the referring site. It is through the use of cookies that the operating systems of the websites Groups can automatically collect this information about your visit. Cookies are text files of negligible size that are transmitted to your browser when you access a website. When you visit one of our websites, information may be stored in your browser retrieved from, usually in the form of cookies. This information may relate to you, your preferences or your device and is mainly used to ensure that the website functions correctly. The information does generally not identify you directly but may enable you to benefit from a personalized. Because we respect your right to privacy, we give you the option of not allowing certain types of cookies. However, if you block certain types of cookies, your browsing experience and the services we are able to offer you may be affected.

6.1.1 The different types of cookies:

- 6.1.1.1 **Strictly necessary cookies:** These cookies are necessary for the operation of the website and cannot be deactivated in our systems. You cannot therefore delete them. They are generally set as responses to actions you have taken that constitute a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block these cookies or to you alert to their existence, but some parts of the website may not you. be accessible to These cookies do not store any personally identifying information
- 6.1.1.2 **Functionality cookies:** These cookies are used to improve and personalize the functionality of the website. They may be activated by our teams, or by third parties whose services are used on our website pages. If you do not accept these cookies, some or all of these services may not function correctly.
- 6.1.1.3 **Performance cookies:** These cookies enable us to determine the number of visits and sources of traffic, in order to measure and improve the performance of our website. They also help us to identify the most and least visited pages, and to evaluate how visitors navigate the website. All information collected by these cookies is aggregated and therefore anonymized. If you do not accept these cookies, we will not be informed of your visit to our site.

In particular, the following information is collected:

- your IP address
- your geographical location (region derived from your IP address)
- your Internet service provider
- day and time of visit
- the domain of the previous site visited
- the URL address and titles of pages visited on our Web sites
- your activities (clicks, screen scrolling, etc.) on our Web sites
- the point of origin of your visit (banner, e-mail, social network, advertiser's website)
- the type of customer to which you belong (individual, group, organization, etc.)
- your searches using the tool integrated into our sites

- 6.1.1.4 **Cookies for targeted advertising:** With your permission, these cookies may be placed on our website by our advertising partners. They may be used by these companies to profile your interests and provide you with relevant advertising on other websites. They do not directly store your Personal Information but are based on the unique identification of your browser and device. If you do not allow these cookies, the advertisements displayed will be less targeted. This practice only

applies to navigation on our informational website and EXCLUDES navigation in your Customer Area.

These cookies may allow us to:

- to adapt the content displayed on your device in our advertising spaces according to the information you have given us;
- benefit from our personalized advice and offers tailored to your point of origin (for example, if you come from a partner site);
- adapt our advertising spaces to the display characteristics of your device (language used, display resolution, operating system, etc.);
- to adapt the content displayed on your device in our advertising spaces, according to the browsing history of your device on our site;
- adapt the content displayed on your device in our advertising spaces according to your location data.

6.1.2 How you can manage cookies in general

We invite you to visit the following webpages:

- [Deleting and managing cookies in the](#)
- [Enable or disable cookies in Chrome.](#)
- [Allowing and blocking cookies in Firefox.](#)
- [Delete Safari history and cookies on your iPhone, iPad or iPod touch.](#)
- [Delete your history and activity on Android.](#)

6.2 Chat

The Group makes chat rooms available to you. Please note that your voluntary disclosure of Personal Information to these chat rooms is not governed by this Privacy Policy. No confidential information should be transmitted via this communication channel. Consequently, the Group is not responsible for any information communicated via these chat rooms, and such voluntary communications are of a public nature and at your own risk.

6.3 Social platforms

We collect information transmitted by social networking sites or applications (e.g. LinkedIn and YouTube) when a visitor interacts with profiles owned or controlled by the Group on these social networking platforms. These sites or applications are governed by their own policies relating to your personal information, which may differ from ours and may also be applicable. If you choose to interact with us through these social media channels, you should first read the terms of service and privacy policies of these third-party service providers, and the applications used to access them.

6.4 Hyperlinks

The Group's websites may contain hyperlinks enabling users to visit other sites operated by other companies or groups of professionals, for example ("third-party sites"). By clicking on these hyperlinks, you will leave our Web sites for those of third parties, which may have different privacy policies and practices. This Privacy Policy no longer applies when you leave our website. Please consult the privacy policies of these other entities before providing any Personal Information to their sites. These links are provided for user convenience only. The Group does not control, endorse or guarantee in any way the sites linked to this gateway, and the Group cannot be held responsible for the content of these other sites or for the practices of their operators, particularly with regard to the protection of your Personal Information and respect for privacy.

7 Special case of Payment Information

Please note that in some areas of our Web site, you may be asked to provide information in credit card order to make a purchase. Your online transactions are secure. As a customer, you will be redirected to a secure payment platform. The information you transmit to make a payment, including your full credit card number, will never be transmitted to the Group, even in the case of pre-approved payments. If your payment is not pre-approved or if the transaction fails, you will be invited to repeat the payment process and will be redirected to the aforementioned secure payment platform. This secure payment platform complies with the Payment Card Industry Data Security Standard (PCI DSS). Your transactions are always routed, processed and stored securely by the platform manager. However, we retain your transaction confirmation number and the last 4 digits of your credit card number for accounting purposes. This information is kept in your customer file with the Group.

8 Security

The Group has adopted this Privacy Policy to comply with the requirements of ISO 27001, eIDAS, SOC2 and new legal obligations in Quebec, among others.

The Group therefore implements measures to ensure the protection of Personal Information in its custody against theft, loss, unauthorized access, use or disclosure, by means of reasonable technical, administrative or physical security measures, taking into account, in particular, the sensitivity of the information, the purpose for which it is to be used, its quantity, distribution and medium. Thus,

among other things, when it considers appropriate, the Group uses encryption and/or authentication tools, as well as other methods to protect certain Personal Information stored on its servers. In particular, Personal Information collected is handled in accordance with our information security policy. All employees Group undertake in writing to comply with this policy, and access to documents of a personal nature is restricted to authorized employees only. The Group periodically reviews its policies and adopts additional security parameters in line with technological developments, new threats and its capabilities. Notwithstanding the foregoing, complete confidentiality and security cannot yet be guaranteed over the Internet. Any unencrypted electronic communication transmitted over the Internet is neither secure nor confidential, and is subject to interception, loss or alteration. You acknowledge and agree that the Group, its officers and employees are not responsible and not shall be liable to you or any third party for any damages of any kind, whether direct or indirect, incidental, special or consequential, resulting from the transmission of confidential information or Personal Information via the Internet and that such communications are at your own risk. Finally, we also have procedures in place to deal with any suspected breach of security of Personal Information. We will notify you and any applicable supervisory authority of a suspected breach of security of Personal Information when we are required to do so by Law, and within the time limits required by such, Law if any.

9 Accuracy and updating of Personal Information

The Group ensures that all Personal Information in its possession is as accurate, current and complete as necessary for the purposes for which it is to be used.

If you are one of our customers, some of the Personal Information we hold about you is accessible through your portal and can be modified by logging in to your portal.

We make reasonable efforts to ensure that your Personal Information remains accurate, complete and as up to date as possible. You have the right to request access to your Personal Information for verification purposes and to request a correction if your Personal Information is inaccurate. If you believe that your Personal Information is inaccurate, or if you wish to access your Personal Information, you may make a request using the contact information provided in the section 10 of this Policy.

10 Contact our Privacy Officer

The Group is responsible for the processing of Personal Information in its custody and control and has designated an internal Privacy Officer, our CEO, who oversees its compliance with the Policy Privacy and applicable laws privacy.

If you believe that we are holding inaccurate, incomplete or misleading Personal Information about you, you have the right to request that this information be rectified by e-mailing your request to dpo@portagecybertech.com. You may also withdraw your consent at any time, for example to

receive communications from the Group, by contacting Customer Support directly at the contact details shown on our website.

You can also contact us by mail at one of the following addresses:

Gatineau office:

c/o Privacy Officer

85 Rue Victoria, 2nd floor

Gatineau, Quebec J8X 2A3

Montreal office:

c/o Privacy Officer

465 McGill, Suite 300

Montréal (Québec) H2Y 2H1

You must provide proof of your identity, including your name and contact details, the nature of your request, the name of the product or person you have already contacted, and any other relevant information.

We will respond to any written request within 30 days of receipt, whenever possible. We will provide reasonable access to the personal information individuals in our files in accordance with applicable laws and regulations. Fees may apply in certain cases. We may verify the identity of the person seeking access to his or her Personal Information. Information provided for such verification will not be recorded or used for any other purpose. We will give reasons for any refusal to grant your request, including the legal provision we are relying on.

11 Legal framework of the Privacy Policy

The processing of Personal Information is governed by laws applicable in various jurisdictions. This Policy and all related transactions shall be governed by the laws and construed in accordance with Quebec of including:

- *Civil Code of Quebec* (L.Q., 1991, c.64), in particular articles 36 and 37, which deal respectively with respect for privacy and communication of confidential information;
- *An Act to establish a legal framework for information technology* (R.S.Q., c. C-1.1);
- *Act respecting the protection of personal information in the private sector* (R.S.Q., c. P-39.1)
- *An Act to modernize legislative provisions respecting the protection of personal information, LQ 2021 c 25*

12 Changes to and validity of the Privacy Policy

The Group reserves the right to modify this Policy at any time Privacy. All changes will be posted on the websites Group's and will take effect immediately upon posting. We will take reasonable steps, if necessary, to inform affected individuals of any material changes. Check this periodically for Policy changes. You will be deemed to have accepted changes to this Policy if you continue to provide us with Personal Information after changes are posted.

This Policy is reviewed and updated regularly to ensure that it complies with changes regulatory and best practices. A minimum annual review is in place.

The Privacy Policy is approved by the Group COO, on behalf of the Privacy Officer, including any changes to be made.

The COO oversees its application day-to-day.

Trish McNeely
COO