

Privacy Policy

Protecting privacy and information security is important to Les Portes ARD (hereinafter "we" "our"). For this reason, we have implemented protection measures and good management practices for your personal information in accordance with applicable laws, including Law 25.

This privacy policy (the "Policy") describes our practices regarding the collection, use, processing, communication, and retention of personal information from our clients, visitors, and users.

By using our website <u>PortesARD</u> (the "Website") or by communicating with us through technological or other means, you agree that we may collect, use, process, disclose, and retain your personal information in accordance with the terms described in this Policy.

Purpose of this Policy

This Policy informs you about what personal information we collect, how we process it, and when we need to disclose it to subcontractors or third parties.

The term "personal information" refers to any information about an individual that directly or indirectly reveals something about their identity, characteristics, or activities. For example, this may include your name, date of birth, personal email address, financial information, or personal identification numbers.

Contact us

Any comments, questions, requests, concerns, exercise of a right, or complaints regarding this Privacy Policy should be directed to Carole Micheli, Privacy officer, at the following contact details:

Les Portes ARD Address : 755 boul. Cristini, Lachute, QC, J8H 4N6 Email : <u>info@portesard.com</u>

Consent to collect personal information

This privacy policy informs you of the following:

- What personal information we collect and for what purposes
- Our means of collection
- How we process it
- When we need to disclose it to subcontractors or third parties
- Our confidentiality and security measures
- Your rights regarding your personal information

By providing us with personal information, you authorize Les Portes ARD to collect and process your personal information necessary to offer our products and services. You can refuse the electronic collection of your personal information by contacting us as indicated in the "<u>Contact us</u>" section. The consent you provide at the time of collection or processing of your personal information can be withdrawn at any time. We will ensure to respect your choice in accordance with our legal obligations.

As part of our activities, we collect and use personal information through specified means such as:

- While browsing our website;
- During our communications via phone, email, or in person.

Collected personal information

As part of our activities, we may collect, process, and use different types of personal information. We strive to limit the collection of personal information to what is necessary to offer our services or as permitted by law.

Below are the types of personal information we collect and their uses:

- > Via our website and all electronic means or sites:
 - Identification information such as your first and last name, postal address, email address, personal phone number if you contact us personally and not on behalf of a business via our website or email;
 - Information related to your purchases, communication language, and sometimes information about your preferences or consumption habits.
- > During your interactions with us:
 - Information you choose to provide or transmit to us, for example, when you fill out a form (registration, job application, after-sales service, etc.), respond to surveys, or communicate with one of our employees or representatives personally.

Use of personal information

Generally, we use your personal information for purposes allowed or required by law or for the following purposes:

- To offer or improve our products and services or develop new products and services;
- To enable job applications, respond to your questions, collect feedback and comments, or provide assistance as needed;
- To operate, maintain, supervise, develop, improve, and offer all functionalities of our website;
- For identity verification, personal background checks as permitted by law, or to comply with our obligations under current laws and regulations;
- To send newsletters, quotes, invoices;
- To send messages, updates, security alerts, or communications in accordance with the law;
- To administer a contest, promotion, survey, or another feature of the website or our services;
- To conduct research and analysis related to our business and services;
- To detect and prevent fraud, errors, spam, abuse, security incidents, and other harmful activities;
- To establish, exercise, or defend a right or legal proceeding.

We always respect the purposes for which we collected your personal information. If we wish to use or disclose your personal information for other purposes, we will seek your consent unless permitted by law.

Individuals under 14 years old

Our website is not intended for individuals under 14 years old. We do not knowingly collect any personal information from individuals under 14. If you are under 14, you should not provide us with your personal information without your parent's or guardian's consent.

If you are a parent or guardian and learn that your child has provided us with personal information without consent, please contact us as indicated in the "<u>Contact us</u>" section to request the deletion of that child's personal information from our systems.

Disclosure of personal information

In the course of our activities, we make your personal information accessible to our employees, consultants, or agents whose functions require it.

While we try to avoid sharing your personal information with third parties, we may use service providers to perform various services on our behalf. In such cases, we only provide the personal information necessary to perform their mandate and ensure that the principles outlined in this Policy are followed.

Moreover, these service providers offer sufficient guarantees regarding the implementation of appropriate protection measures for your processed or communicated personal information before your personal information is disclosed to them. When our service providers no longer need your personal information, we ask them to destroy this data appropriately.

The personal information we collect and retain remains protected and is securely hosted on servers located in Quebec, except for our data storage services which may host certain data outside Quebec (Canada or the United States).

We may also share, transfer, or disclose your personal information in strict compliance with this Policy with third parties when required by law or in the context of a commercial transaction involving the sale, transfer, or assignment of all or part of Les Portes ARD or our assets. In such a case, and if the commercial transaction materializes, we will inform you before your personal information is governed by another privacy policy.

We do not sell, trade, or otherwise disclose your personal information to third parties, subject to legal exceptions.

Retention of personal information

Subject to applicable laws, we retain your personal information only for the time necessary to fulfill the purposes for which it was collected unless you consent to its use or processing for another purpose. After this period, your personal information will be destroyed or anonymized securely.

For more information on the retention periods of your personal information, please contact us as indicated in the "<u>Contact us</u>" section.

Rights regarding personal information

You have the following rights:

Access : the right to be informed about the personal information we hold about you and to request a copy of documents containing your personal information, subject to exceptions provided by applicable law;

Accuracy and rectification : the right to have the personal information we hold about you corrected, modified, and updated if it is incomplete, equivocal, outdated, or inaccurate;

Withdrawal : the right to withdraw or modify your consent for Les Portes ARD to collect, use, disclose, or retain your personal information at any time, subject to applicable legal and contractual restrictions;

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De-indexing : the right to request that we stop disseminating your personal information and deindex any link associated with your name that gives access to this information if such dissemination violates the law or a judicial order;

Information : the right to be informed when you are subject to a decision based solely on automated processing or when using an identification, localization, or profiling technology, and the means offered to enable these functions;

Portability : the right that allows individuals to retrieve their personal information provided to an organization and transfer it to another organization of their choice. This right only applies to computerized personal information provided directly by the individual concerned;

Complaint : the right to file a complaint with the Commission d'accès à l'information subject to conditions provided by applicable law.

To exercise any of these rights, please contact us as indicated in the "<u>Contact us</u>" section of this Policy.

Protection of personal information

Les Portes ARD has implemented physical, technological, and organizational security measures to adequately protect the confidentiality and security of your personal information against loss, theft, unauthorized access, disclosure, reproduction, communication, or use.

These measures include access control to our offices and equipment, secure connection on our website between your device and our server, raising awareness among Les Portes ARD employees about this Policy, obtaining their commitment to comply with it and respect the confidentiality of your personal information, and adopting governance aimed at secure retention and destruction of your personal information.

We also limit access to your personal information to staff members who need it to perform their duties. These individuals only have access to the information necessary to carry out their tasks.

Despite adopting such measures, we cannot guarantee the absolute security of your personal information. If you have reasons to believe that your personal information is no longer protected, please contact us immediately as indicated in the "<u>Contact us</u>" section.

Limitation of liability

Les Portes ARD is committed to taking all reasonable measures to ensure a level of confidentiality and security of personal information in line with appropriate technological standards considering its business sector.

Despite the foregoing, you understand and acknowledge that no computer system offers absolute security and that there is always a risk when transmitting personal information over the public network that is the Internet.

You agree that Les Portes ARD cannot be held responsible for any breach of confidentiality, hacking, viruses, loss, theft, misuse, or alteration of personal information transmitted or hosted on its systems or those of a third party. You also declare to waive any claim in this regard except in cases of gross negligence or intentional misconduct by Les Portes ARD.

Therefore, you agree to release Les Portes ARD and its officers, directors, related persons, and business partners from any liability for any damage of any kind, whether direct or indirect, incidental, special, or consequential, in connection with the use of your personal information.

In the event of a breach of confidentiality or security of your personal information that presents a high risk to your rights and freedoms, this breach will be notified to you as soon as possible, and Les Portes ARD will take the necessary measures to preserve the confidentiality and security of your personal information.

Cookies

We use cookies and other similar technologies (collectively "cookies") to help us operate, protect, and optimize the website and the services we offer. You can configure your browser to be informed of the setting of cookies during your visit to the website so that you can decide in each case to accept or refuse the use of some or all cookies.

Among the cookies we collect via our website are:

- Functionality Cookies: These cookies improve and personalize the functionalities of the website. They can 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 properly.
- Performance Cookies: These cookies allow us to determine the number of visits and traffic sources to measure and improve the performance of our website. They also help us identify the most/least visited pages and 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 website.
- Targeted Advertising Cookies: These cookies may be set on our website by our advertising partners. They may be used by these companies to build a profile of your interests and show you relevant ads on other websites. They do not directly store personal data but are based on the unique identification of your browser and internet device. If you do not allow these cookies, your advertising will be less targeted.

Update of this Policy

We reserve the right to modify this Policy at any time in accordance with applicable legislation. In the event of modification, we will publish the revised version of the Privacy Policy, update its update date, and present an update notice on the homepage of our website. The notice will indicate the publication date, the general subject of the changes made, and the date the changes take effect.

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We encourage you to review this Policy each time you access our website to stay informed about the protection measures and good practices of your personal information.

If you do not approve the new terms of the Privacy Policy, we invite you to stop using our website and services. If you choose to continue using our website or services after the new version of our

Policy comes into effect, your use of our website and services will then be governed by this new version of the Policy.

This policy was last updated on October 15, 2024.

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