



PRIVACY POLICY FRAMEWORK

Update History

Version	Description of changes	Date	Updated by

Governance

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1 INTRODUCTION

In the context of its activities and mission, Les Entreprises QMD Inc. processes personal information, particularly that of its customers and employees. As such, Les Entreprises QMD Inc. recognizes the importance of respecting privacy and protecting the personal information it holds.

Les Entreprises QMD Inc. has adopted the present policy to fulfill its obligations. This policy defines the framework principles applicable to protecting personal information held by Les Entreprises QMD Inc. throughout its life cycle, as well as the rights of the individuals concerned.

Protecting personal information is the responsibility of all persons handling such information.

2 OBJECT

This policy :

- sets out the governance principles of Les Entreprises QMD Inc. concerning personal information throughout its life cycle
- provides a framework for the exercise of the rights of the persons concerned
- provides a process for handling privacy complaints
- defines the roles and responsibilities of Les Entreprises QMD Inc. concerning the protection of personal information
- describes the training and awareness activities that Les Entreprises QMD Inc. offers to its employees

3 NORMATIVE FRAMEWORK

This policy is governed by the *Act respecting the protection of personal information in the private sector* and applicable privacy regulations.

4 DEFINITIONS

For this policy, the following terms mean:

"CAI" means the Commission d'accès à l'information du Québec.

"life cycle" means all the steps involved in the processing of personal information, i.e. its collection, use, disclosure, retention and destruction.

"privacy impact assessment" or **"PIA"** refers to a preventive approach aimed at improving the protection of personal information and respecting the privacy of individuals. It involves considering all the factors that could have a positive or negative impact on the privacy of the individuals concerned.

"confidentiality incident" means any unauthorized access, use or disclosure of personal information or any loss or other breach of the protection of such information.

"Act" means the Act respecting the protection of personal information in the private sector.

"affected person" means a physical person to whom the personal information relates.

"profiling" refers to the collection and use of personal information to assess specific characteristics of an individual to analyze the individual's work performance, economic situation, health, personal preferences, interests or behaviour.

"personal information" means any information relating to a physical person that enables that person to be identified either directly - i.e. by recourse to that information alone - or indirectly - i.e. by combination with other information.

"sensitive personal information" means any personal information that - because of its nature, including medical, biometric or otherwise intimate, or because of how it is used or disclosed - raises a high reasonable expectation of privacy.

"Privacy Officer" means the person within Les Entreprises QMD Inc. responsible for ensuring compliance with the law.

5 FIELD OF APPLICATION

This policy applies to personal information held by Les Entreprises QMD Inc. and any person who processes personal data for Les Entreprises QMD Inc., such as service providers or subcontractors.

6 PERSONAL INFORMATION PROCESSING

Personal information is protected throughout its life cycle by the following principles, considering the exceptions provided by law.

6.1. COLLECTION

6.1.1. Les Entreprises QMD Inc. collects only the personal information required to conduct its activities. Before collecting personal information, Les Entreprises QMD Inc. determines the purposes for which it is to be processed.

6.1.2. Personal information is collected from the person concerned unless the law allows it to be collected from a third party based on actual, free, informed consent given for specific purposes.

6.1.3. At the time of collection, and after that upon request, Les Entreprises QMD Inc. informs the persons concerned, minimally :

- the purposes for which the information is collected
- how the information is collected
- the rights of access and rectification as provided by law
- their right to withdraw consent to the disclosure or use of the information collected
- if applicable, the name of the third party for whom the data is collected
- if applicable, the names of the third parties or categories of third parties to whom it is necessary to communicate the information for the declared purposes
- if applicable, the possibility that the information may be disclosed outside Quebec
- if applicable, the use of a technology that includes functions allowing the identification or profiling of the individual
- the means offered to activate functions enabling them to be identified, located or profiled if advertising or browsing cookies are used

6.1.4.The information listed in paragraph 6.1.3 is given in simple and clear terms using a privacy policy or a "just-in-time" notice.

6.1.5.The individual concerned who provides his personal information after having received the information in paragraph 6.1.3 is presumed to consent to the use and communication for the declared purposes.

6.1.6.At the request of the person concerned, Les Entreprises QMD Inc. shall also inform him or her of the following:

- personal information collected from him or her
- the categories of persons with access to this information within Les Entreprises QMD Inc.
- how long the information will be kept
- contact information for the person responsible at Les Entreprises QMD Inc.

6.1.7.Where no exception to consent under the law applies, consent must be manifest, voluntary, informed and given for specific purposes. Consent is requested for each of these purposes in clear and simple terms. Consent is valid only for the time required to achieve the purposes for which it was requested.

6.2. USE

6.2.1.QMD uses personal information only for the purposes for which it was collected. However, QMD may change these purposes with the consent of the person concerned.

6.2.2. QMD may also use them for secondary purposes without the consent of the person concerned in any of the following cases:

- when the use is for purposes compatible with those for which the information was collected (compatible purposes exclude commercial or philanthropic prospecting)
- when the use is clearly for the benefit of the person concerned
- when its use is necessary to prevent and detect fraud or to evaluate and improve protection and security measures

- when its use is necessary for the supply or delivery of a product or the provision of a service requested by the person concerned
- when use is needed for study, research or statistical purposes, and the information is anonymized

6.2.3. When the proposed use for secondary purposes involves sensitive personal information, Les Entreprises QMD Inc. must obtain the express consent of the persons concerned.

6.3. COMMUNICATION

6.3.1. Subject to the exceptions provided for by law, Les Entreprises QMD Inc. cannot communicate personal information without the consent of the person concerned. Consent must be expressly given when sensitive personal information is involved.

6.3.2. Les Entreprises QMD Inc. may communicate personal information without consent to an agent or service provider in the context of a mandate or service contract. To this end, Les Entreprises QMD Inc. must enter into a written agreement with the agent or service provider, which stipulates, at a minimum, the measures that the agent or service provider must take:

- to protect the confidentiality of personal information
- to ensure that this information is only used in the performance of the mandate or contract
- to ensure that it is not retained after expiration

The agreement must also specify the following:

- the agent or supplier must promptly notify the company of any breach or attempted breach by any person of any of the obligations relating to the confidentiality of the information communicated
- the privacy officer of Les Entreprises QMD Inc. reserves the right to verify this confidentiality

6.3.3. When personal information is disclosed outside Quebec, Les Entreprises QMD Inc. conducts a PIA according to section 7 of this policy.

6.4. COMMUNICATIONS REGISTER

6.4.1. Les Entreprises QMD Inc. maintains a register of specific disclosures of personal information. This register details the following disclosures:

- to a person or organization that has the power to require Les Entreprises QMD Inc. to disclose personal information and that requires such information in the performance of its duties
- to a person who must receive it because of an emergency threatening the life, health or safety of the person concerned or to whom Les Entreprises QMD Inc. may communicate it to prevent an act of violence, including suicide, in the event of a severe risk of death or severe injury to an identifiable person or group of persons
- to an archive or any person, in the second instance, if the document is more than 100 years behind or if the person concerned has been dead for more than 30 years
- to a person or organization for a mandate or contract for services or business
- to the other party to a commercial transaction if the communication is necessary for the conclusion of the transaction
- to a person who may use them for study, research or statistical purposes or to a person authorized by CAI to use them
- to a person who is authorized by law to collect debts for others and who requires him to do so in the performance of his duties
- to an individual if the information is necessary to collect a debt from Les Entreprises QMD Inc.

6.5. STORAGE

6.5.1. Les Entreprises QMD Inc. takes all reasonable measures to ensure that the personal information it holds is up-to-date, accurate and complete to serve the purposes for which it is collected or used.

Les Entreprises QMD Inc. retains personal information for as long as necessary to carry out its activities, subject to the time limits set out in its Retention Policy

and the associated calendar.

6.6. Destruction and anonymization

6.6.1. Once the purposes for which the personal information was collected have been achieved, this information is destroyed or anonymized in accordance with the retention calendar and document management rules of Les Entreprises QMD Inc.

7 PRIVACY IMPACT ASSESSMENT

7.1. Under the supervision of the privacy officer, Les Entreprises QMD Inc. conducts a PIA for the following personal information processing operations:

- before starting a project for the acquisition, development or redesign of an information system or the electronic delivery of services involving personal information
- before disclosing personal information without consent to a person or organization wishing to use the information for study, research or statistical purposes
- when it intends to communicate personal information outside of Quebec

7.2. In conducting a PIA, Les Entreprises QMD Inc. considers the sensitivity of the information to be processed, the purposes for which it is to be used, its quantity, distribution and medium, and the measures proposed to protect personal information.

7.3. In addition, when personal information is communicated outside Quebec, Les Entreprises QMD Inc. ensures that it is adequately protected, particularly concerning generally accepted principles of personal information protection.

7.4. Completing a PIA demonstrates that Les Entreprises QMD Inc. has complied with all obligations regarding the protection of personal information and that all measures have been taken to protect this information effectively.

8 RESEARCH ACTIVITIES AND ACCESS TO PERSONAL INFORMATION

8.1. Researchers may request access to personal information for research purposes. Such a request must be submitted to the Privacy Officer of Les Entreprises QMD

Inc.

8.2. Once the PIA concludes that personal information may be disclosed for this purpose, Les Entreprises QMD Inc. must agree with the researchers that includes the mandatory content of the law and any additional measures identified in the PIA.

9 RIGHTS OF THE PERSONS CONCERNED

9.1. Subject to the provisions of applicable laws, any data subject about whom Les Entreprises QMD Inc. holds personal information has the following rights, among others:

- the right to access and obtain a copy of personal information held by Les Entreprises QMD Inc. in electronic or non-electronic form
 - unless this raises practical severe difficulties, personal electronic information collected from a person concerned and not created or deduced from personal details concerning him or her is communicated to him or her in a structured and commonly used technological format at his or her request. This information is also communicated, upon request, to any person or organization authorized by law to collect such information.
- the right to rectify any incomplete or inaccurate personal information held by Les Entreprises QMD Inc.
- the right to request the removal of outdated or unjustified information or to make written comments to Les Entreprises QMD Inc.
- the right to request that Les Entreprises QMD Inc. stop distributing information or delete any hyperlink attached to its name by technological means when the distribution of this information violates the law or court order
- the right to ask Les Entreprises QMD Inc. to stop distributing information or to delete or replace any hyperlink attached to its name when the following conditions are met:

- the dissemination of this information causes serious harm to his or her right to respect for his or her reputation or private life
 - this harm outweighs the public interest in knowing the information or the interest of any person in expressing themselves freely
 - the requested cessation of dissemination, requested re-indexation, or requested de-indexation does not exceed what is necessary to prevent further harm, taking into account, in particular, whether the person concerned is a public figure or not, whether the information concerns a minor, whether the information is up-to-date and accurate, the sensitivity of the information, the context in which the information is disseminated, the time lapse between the dissemination of the information and the request made to Les Entreprises QMD Inc. if the information concerns criminal or penal proceedings, the granting of a pardon or the application of a restriction on access to court records
- the right to be informed, if applicable, that personal information is being used to make a decision based on automated processing
 - the partner or close relative of a deceased person may request from Les Entreprises QMD Inc. personal information that it holds concerning this person if knowledge of this information is likely to help him or her in the grieving process and the deceased person has not recorded in writing his or her refusal to grant this right of access

9.2. Although the right of access may be exercised at any time, access to documents containing this information is subject to some exceptions identified in the law.

Les Entreprises QMD Inc. may refuse to disclose personal information to an individual where disclosure of the information could reasonably be expected to :

- interfere with an investigation conducted by its internal security department to prevent, detect or suppress crime or breaches of the law or, on its behalf, by an external department having the same purpose or a security guard or investigation agency licensee issued following the *Private Security Act*

9.2.1. affect any legal proceedings in which any such person has an interest

9.2.2. Les Entreprises QMD Inc. shall refuse to disclose personal information to any person:

- To a concerned person when its disclosure would likely reveal personal information about a third party or the existence of such information and such disclosure would be likely to seriously harm that third party, unless the third party consents to its disclosure or it is a case of emergency endangering the life, health or safety of the concerned person
- to the estate executor, life insurance or death benefit beneficiary, heir or successor of the person to whom the information relates, unless such disclosure would compromise the interests and rights of the person requesting it as executor, beneficiary, heir or successor, subject to the right of the spouse or parent of a deceased person mentioned above

9.3. The request for access to personal information must be specific enough to allow the privacy officer to identify the personal information. The right of access applies only to existing personal information.

9.4. The privacy officer will respond to requests for access or rectification in writing promptly and, at the latest, within 30 days of receipt of the request.

9.5. Access to personal information contained in a file is free of charge. However, Les Entreprises QMD Inc. may charge a reasonable fee for the transcription, reproduction or transmission of such information after informing the applicant of the approximate amount payable before proceeding with such information.

9.6. When the privacy officer grants a request for rectification or deletion, it notifies any person who has received the information in the previous six months and, where applicable, the person who holds the information of the rectification or deletion. In addition, a copy of any personal information amended or added, or, as the case may be, an attestation of the personal information deleted, will be issued to the applicant free of charge.

9.7. Failing to respond within 30 days of receipt of the request, Les Entreprises QMD Inc. will be considered to have refused to grant the request. That said, the privacy officer must give reasons for any refusal to grant a request and indicate the provision of the law on which the refusal is based, the means of appeal available to the applicant under the law and the time limit within which they may be exercised. He must also assist the requesting party to help him understand the

refusal.

10 COMPLAINTS PROCESSING

Any complaint regarding the personal information protection practices of Les Entreprises QMD Inc. or its compliance with legal requirements concerning individual information is forwarded to the privacy officer, who responds within 10 days.

11 PERSONAL INFORMATION SECURITY

11.1. Although it cannot guarantee zero risk, QMD implements reasonable security measures to ensure the confidentiality, integrity and availability of personal information collected, used, disclosed, retained or destroyed. These measures consider the sensitivity of the personal information, the purpose for which it is collected, its quantity, location and format.

11.2. Les Entreprises QMD Inc. applies high standards and uses effective security systems in the design, implementation and daily operation of its Platforms (websites, etc.) and its underlying servers and networks. It also continues its efforts to detect and block intrusions on or to its Platforms. We have implemented various measures to ensure that personal information is protected against loss and theft, as well as against unauthorized access, communication, reproduction, use, modification or destruction. These measures include physical, administrative and technological security measures, such as managing the access rights of our staff members so that only those subject to a confidentiality undertaking (if applicable) and who require access in their duties have access to personal information.

12 CONFIDENTIALITY INCIDENTS

12.1. Any incident of confidentiality is handled following the procedure in place at Les Entreprises QMD Inc. Les Entreprises QMD Inc. then takes reasonable measures to reduce the risk of harm being caused and to prevent similar incidents from occurring in the future. It updates its personal information protection program if necessary.

12.2. All confidentiality incidents are reported to the privacy officer and recorded in the confidentiality incident register following article 13.1 of this policy.

12.3. If the confidentiality incident presents a risk of serious harm to the persons concerned, Les Entreprises QMD Inc. promptly notifies them and the CAI in accordance with its incident response procedure.

13 CONFIDENTIALITY INCIDENT REGISTER

13.1. Les Entreprises QMD Inc. maintains a register of confidentiality incidents that complies with the law and regulations. Such register includes:

- a description of the personal information affected by the incident or, if this information is not available, the reason why such a description cannot be provided
- a brief description of the circumstances of the incident
- the date or period when the incident took place or, if this is not known, an approximation of this period
- the date or period during which the organization became aware of the incident
- the number of people affected by the incident or, if not known, an approximation of this number
- a description of the factors that lead Les Entreprises QMD Inc. to conclude that there is or is not a risk of serious prejudice to the persons concerned, such as the sensitivity of the personal information concerned, the possible harmful uses of this information, the anticipated consequences of its use and the probability that it will be used for harmful purposes
- if the incident presents a risk of serious damage being caused, the dates on which notices were sent to the CAI and the persons concerned, following the second paragraph of section 3.5 of the Act respecting the protection of personal information in the private sector, as well as a statement indicating whether Les Entreprises QMD Inc. gave public notices and the reason why, if applicable
- a brief description of the actions taken by Les Entreprises QMD Inc. following the incident to reduce the risk of damage being caused
- any other element provided for in the *Confidentiality Incident Regulations*

14 FUNCTIONS AND RESPONSIBILITIES

14.1. The protection of personal information held by Les Entreprises QMD Inc. relies on the commitment of all those who handle such information, and more specifically, the following:

14.2. The privacy officer :

- is designated in writing by the person exercising the highest authority within Les Entreprises QMD Inc.
- ensures compliance and implementation of the law for Les Entreprises QMD Inc.
- ensures the establishment and implementation of policies and practices concerning the company's governance of personal information and the protection of such information by approving such policies and practices
- is consulted for a PIA at the outset of any project involving the acquisition, development or redesign of an information system or the electronic delivery of services involving the collection, use, disclosure, retention or destruction of personal information
- at any stage of a project covered by the previous point, the privacy officer may suggest measures to ensure the protection of personal information involved in the project, such as:
 - the designation of a person responsible for implementing protective measures
 - privacy protection measures in all project documents
 - a description of the privacy responsibilities of project participants
 - privacy training for project participants
- supervises the maintenance of the registers provided for in articles 6.4 and 13 of the present policy
- is involved in assessing the risk of serious harm associated with a confidentiality incident, particularly regarding the sensitivity of the

information concerned, the anticipated consequences of its use, and the probability that this information will be used for malicious purposes

- collaborates with the relevant government authorities and stakeholders in the event of a confidentiality incident
- if applicable, records the communication of a confidentiality incident to a person or organization likely to reduce the risk of harm
- if applicable, verifies confidentiality obligations in connection with the disclosure of personal information under contracts or mandates entrusted to third parties, following section 6.3.2 of this policy
- receives written requests from persons concerned to exercise their rights and ensures compliance with paragraphs 9.5 to 9.8 of this policy
- reports annually to the Board of Directors on compliance with legal requirements, ensuring that they are respected and implemented

14.3. Any person who handles personal information held by QMD:

- acts with care applies the principles set out in this policy to its activities
- has access only to the information required to perform its duties
- integrates and retains information only in files intended for the performance of its duties
- keeps these files accessible only to authorized persons
- protects access to personal information in its possession or to which it has access using a password
- refrain from disclosing personal information that comes to their knowledge in the performance of their duties unless duly authorized to do so
- refrains from retaining, at the end of his employment or contract, personal information obtained or collected in the course of his duties and maintains his confidentiality obligations
- destroys all personal information following QMD's retention schedule

- participates in privacy awareness and training activities
- report any breach, confidentiality incident or any other situation or irregularity that could compromise the security, integrity or confidentiality of personal information following the procedure established by Les Entreprises QMD Inc.

15 APPROVAL

The present policy and all policies related to the protection of personal information are subject to the approval of Les Entreprises QMD Inc.

16 AWARENESS ACTIVITIES

Les Entreprises QMD Inc. offers training and awareness activities to its employees regarding the protection of personal information. QMD refunds its employees for the cost of training in this regard; communications are sent to all employees at quarterly intervals to remind them of the main points, as well as their prerogatives, obligations and conduct regarding protecting personal information.

17 SANCTIONS

Any person who violates this policy is liable to disciplinary action following the applicable regulatory framework.

18 UPDATES

To keep pace with changes in applicable privacy legislation and to improve Les Entreprises QMD Inc.'s privacy protection program, this policy may be updated from time to time. Please visit the SharePoint version at <https://entqmd.sharepoint.com/sites/EspaceQMD> to consult the most recent version.

19 EFFECTIVE DATE

This policy takes effect upon its adoption by the company.