



## **PL02 - Privacy and Confidentiality Policy**

# Privacy and Confidentiality Policy

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# Privacy and Confidentiality Policy

## 1 Introduction

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Barsalou Lawson Rheault (hereinafter “BLR”) is concerned about your privacy and the protection of your personal information.

In the course of using our services, BLR may collect and you may disclose personal information. The collection, use, disclosure and retention of your personal information is subject to the *Act respecting the protection of personal information in the private sector* (R.S.Q., c. P-39.1) and, where applicable, the European Union's *General Data Protection Regulation* (GDPR).

BLR reserves the right to change this policy at any time. Any changes will be posted on BLR's website. Your use of the Services following the posting of changes to the Policy constitutes acceptance of those changes.

The purpose of this policy is to inform users of the services offered by BLR of the following:

- How their personal data is collected and processed
- What are the users' rights regarding this data
- Who is responsible for the processing of the personal data collected and processed;
- To whom this data is transmitted
- BLR 's use of "cookies" on its websites

## 2 Personal information

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Any factual or subjective information about an identifiable individual is considered personal. Your personal information may include, but is not limited to, your first and last name, address, telephone numbers, gender, email address, marital status, etc.

However, an individual's name, business title, business address, business telephone number and business email address are not personal information.

Personal information shall be protected regardless of the format in which it is held, whether written, graphic, audio, visual, computerized or otherwise.

## 3 Our commitment

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We have established and implemented internal policies and procedures to adequately protect personal information in our possession and we review them on a regular basis.

We make our employees aware of the importance of protecting personal information by requiring training and issuing timely directives outlining their role and obligations in this regard.

## 4 Objectives of the information collection

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When using our services, we collect your personal and confidential information only to enable us to provide you with the requested services in an appropriate and personalized manner. In all cases, the disclosure of your personal and confidential information will be subject to obligations to maintain confidentiality and comply with applicable laws.

# Privacy and Confidentiality Policy

The following types of personal information may be collected, stored and used:

1. Information contained in any communication you send to us by email or otherwise
2. Services provided internally to our employees
3. Management of accounting
4. Contractual information needed from service providers
5. Management of client files
6. Information that you may provide to us through our social media
7. Any other personal information you provided to us.

## 5 Consent

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Subject to the exceptions and requirements of applicable laws, we will not share or disclose your personal information to any other third parties without your consent.

By using our services, you consent to the collection, use and disclosure of your personal and confidential information in accordance with this policy.

Your consent will be requested:

- By a representative of our firm for contractual purposes
- By a representative of our Human Resources Department
- By the primary service provider in cases where BLR acts as a subcontractor

You may withdraw your consent at any time, subject to certain legal or contractual restrictions.

In certain limited circumstances, we may collect, use or disclose personal information without your knowledge or consent. Such circumstances arise when, for legal, medical or security reasons, it is impossible or unlikely to obtain your consent, or when the information is needed to investigate a possible breach of contract, prevent or detect fraud, or enforce the law.

Before disclosing personal information about another individual to us, you must obtain that individual's consent to the disclosure and processing of that personal information under the terms of this policy.

### 5.1 Personal information about a minor

Personal information about a minor under the age of 14 will not be collected from the minor without the consent of the parent or guardian.

## 6 Limits on Collection, Use and Disclosure

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### 6.1 Collection

We limit the collection, use and disclosure of your personal information to the purposes we have identified to you. Your personal information may only be accessed by certain authorized individuals for the purposes for which they have been designated.

# Privacy and Confidentiality Policy

## 6.2 Personal information usage

We may use the personal information collected for the following purposes:

- To provide the requested service
- To answer your information requests
- To improve our services
- To provide any other complementary service associated with the requested service
- To meet the requirements of the law

## 6.3 Disclosure

We may disclose your personal information to any of our employees, professional advisors, suppliers, or subcontractors or affiliates to the extent reasonably necessary to provide the services requested and for the purposes set forth in this policy.

Generally, we do not disclose your personal information. Occasionally, we may share your personal information with certain suppliers or agents in order to provide the services you have requested. In all cases, we comply with legal restrictions and requirements when disclosing your personal information and all such disclosures are subject to a written agreement and a security assessment that demonstrates that your personal information is adequately protected in a manner similar to that in place at BLR.

Your personal information will not be disclosed to third parties other than in accordance with this Privacy Policy, except as required or permitted by law or as ordered by a court of competent jurisdiction.

We may share the information we collect with our service providers to provide applicable services, including for the purposes noted below.

We do not sell your personal information to third parties.

## 6.4 Impact assessment

Impact assessments on the use of personal information are carried out before any personal information is used by BLR. When transfers are made outside Quebec, the impact on such a transfer will also be realized.

## 6.5 International data transfers

The information we collect may be stored, processed and transferred to any country in which BLR or its subcontractors provide services, to enable us to use the information in accordance with this policy.

The information we collect may be transferred to the following countries: the United States of America and certain European Union countries.

Personal information that you post on our website or submit for publication may be available, via the Internet, throughout the world. We cannot prevent the use, good or bad, of this information by third parties.

You expressly agree to the transfer of personal information described in this section.

## 7 Non-personal information

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We may automatically collect certain non-personal information using third-party analytics programs to help us understand how our visitors use our web services, but none of this information can identify you. Your IP address and other relevant information may be used to track fraudulent or malicious activity.

# Privacy and Confidentiality Policy

## 8 Location

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When your location is required to use our services, your location is collected through your device's location services or through location services from your web browser, but only if you have authorized it.

## 9 Cookies

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BLR's web services and affiliates use "cookies". Cookies are small data files that are stored on your computer or mobile device when you visit our website to enhance your user experience by storing certain data on your computer or device. By using BLR's website, you consent to this use.

### 9.1 Cookies we use on our websites

We use cookies for the following purposes:

- a) Authentication: We use cookies to identify you when you visit and browse our website. The cookies used for these purposes are used for login and session management.
- b) Personalization: We use cookies to store information about your preferences and allow us to customize the Service to your needs. The cookies used for this purpose are for capturing language of use for BLR websites.

### 9.2 Cookies used by our service providers

Our service providers may use cookies that may be stored on your computer or device when you use some of our services.

### 9.3 Cookies management

It is possible to set your browser or device to refuse cookies or to delete them after they have been stored. Please refer to the "Help" section of your browser or device for instructions.

### 9.4 Accuracy

We make every effort to ensure that your personal information is accurate and complete for the purposes for which it was collected, used or disclosed.

## 10 Retention of information

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We retain your personal information for as long as necessary for the purposes for which it was collected. We must destroy or anonymize this information in accordance with the law and our record retention policy.

Your personal and confidential information is retained, directly or through subcontractors, only for as long as necessary for the purposes of the requested services and applicable legal and regulatory requirements. We require our subcontractors to adhere to our Privacy policy or to apply policies equivalent to this one. In all cases, access to your personal and confidential information is restricted to those individuals for whom access is required in the performance of their duties.

# Privacy and Confidentiality Policy

## 11 Responsibility

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We are responsible for personal information in our possession or custody, including information that we entrust to third parties for the purpose of providing you with the requested service. We require these third parties to maintain this information under strict confidentiality and security standards.

We adhere to the principles set out in the law. We have policies and guidelines in place that ensure your privacy is protected. Our Privacy and Chief Information Security Officer (CISO) oversees this privacy policy and the various BLR guidelines.

Our staff is knowledgeable and properly trained on privacy policies and practices.

## 12 Security measures

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We have implemented a number of security measures with respect to personal information and confidential data held by us in order to protect such information from loss or theft and to prevent unauthorized access, transmission, use or modification of such personal information, including:

### 12.1 Privacy Impact Assessment

BLR conducts a Privacy Impact Assessment for any information system acquisition, development, redesign or electronic service delivery project involving the collection, use, disclosure, retention or destruction of Personal Information. This assessment documents the bona fide and legitimate interests in the use of personal information.

### 12.2 Secure computing environments

The infrastructure and equipment are hosted in a secure environment in a data center located in Canada.

Access to BLR's website and services is via a secure transmission channel with an SSL certificate (HTTPS).

### 12.3 Access management

Only employees whose duties require them have access to personal or confidential information. Data access is logged and monitored.

### 12.4 Training and awareness

Our employees and partners are trained and made aware of the importance of protecting your personal and confidential information.

### 12.5 Commitment to confidentiality

The signing of a confidentiality agreement by our employees: failure to comply with this agreement may result in sanctions, up to and including dismissal.

Security audits are performed by firms specialized in information security.

# Privacy and Confidentiality Policy

## 12.6 Destruction

We retain your confidential and personal information for as long as necessary to fulfill the purposes for which it was collected. We must destroy or de-identify this information in accordance with the law and our record retention policy. When we destroy or de-identify your personal or confidential information, we take appropriate steps to ensure the confidentiality of your personal information and to ensure that no unauthorized person has access to your personal information during the destruction or de-identification process.

## 12.7 Management of incidents involving personal information

If BLR has reason to believe that a privacy incident involving Personal Information has occurred that poses a risk of serious harm, BLR will promptly notify the *Commission d'accès à l'information du Québec* and any individual whose Personal Information is affected by the incident. BLR may also notify any person or organization that may be able to mitigate the risk by disclosing only the Personal Information necessary for that purpose without the consent of the individual. In all cases, a record will be kept of the incident for reference purposes.

## 13 User rights

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### 13.1 Request for access, removal or correction

You may, subject to any regulatory or contractual restrictions, access, correct or destroy the personal information we hold about you.

We will provide you with such information within 30 days of receipt of the written request and in a structured, commonly used technological format. A fee may be charged to process your request.

In certain limited circumstances, we may refuse to provide you with the information you have requested. Exceptions to your right of access include the fact that the information cannot be disclosed for legal or security reasons. These limitations are described in the Act respecting the protection of personal information in the private sector.

You may verify the accuracy and completeness of your personal information and, if necessary, request that it be amended. Any request for amendment will be dealt with in accordance with the law.

### 13.2 Data Portability

The user has the right to request the portability of their personal data, held by BLR, to another site.

### 13.3 Limitation and opposition to data processing

The user has the right to request the limitation of or to object to the processing of his/her data by BLR and we cannot refuse this request unless it can be shown that there are legitimate and compelling reasons, which can override the interests and rights and freedoms of the user.

### 13.4 Decision based exclusively on an automated process

When applicable, you have the right not to be subject to a decision based exclusively on an automated process if the decision produces legal effects concerning him or her, or significantly affects him or her in a similar way.



# Privacy and Confidentiality Policy

## 14 Requests, complaints and questions

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We are committed to responding to your questions and concerns about the protection of your personal information. If you are not satisfied with the response, you may contact the Privacy Officer at the above address.

### 14.1 Contact details

Any requests or complaints regarding privacy should be directed to the Privacy Officer at the address below:

Privacy Officer  
BARSALOU LAWSON RHEAULT  
GESTION LUINAT INC.  
1500 – 2000 McGill College Avenue  
Montreal, QC H3A 3H3  
Email: RPRP.PO@barsalou.ca

In the event that BLR's Privacy Officer decides not to respond to a user's request, and the user wishes to challenge this decision, or if the user believes that any of his or her rights have been infringed, he or she is entitled to refer the matter to the *Commission d'accès à l'information du Québec*.

## 15 REVIEW AND APPROVAL

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This Policy is effective upon adoption by the Management Committee and may be revised at any time by the Privacy Officer.

Changes may be proposed by various BLR stakeholders, which must be submitted in writing to the *Privacy Officer*.

This Policy should be reviewed at least every two years to ensure its relevance to BLR's mission, the activities of its users, and any substantial changes in legislation or regulatory requirements.

## 16 EFFECTIVE DATE

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This Policy is effective as of August 1<sup>st</sup>, 2023. It supersedes all previous guidelines on this subject.