

PRIVACY POLICY AND PROTECTION OF PRIVATE LIFE

Last update of this policy: [2023-12-21](#)

The protection of personal information is important for us. This policy explains how **Usine Sartigan inc** collects, uses and discloses your personal information. **Usine Sartigan inc** undertakes through this policy to protect your personal information adequately.

It is our responsibility to ensure that any information collected is handled securely. In this regard, we invite you to consult our Privacy Policy, which will answer any questions you may have. This policy includes the nature of the information collected, the reasons why we ask you to provide personal information, how we use your personal information and the security measures in place to protect it.

Personal information

The term “personal information” refers to any information about you that allows, directly or indirectly, to identify you. Personal information generally does not include business contact information, such as name, title or position, business address, business phone number or fax number. During the course of your relationship with **Usine Sartigan inc**, you may be asked to provide certain personal information such as your name, e-mail address, mailing address, phone number, job title, company name, date of birth, identity card, financial data, such as payment information or bank details; social or family situation, recruitment information such as the content of a resume, such as information on education and professional history and any other personal information that you may provide to us from time to time.

Consent

Wherever possible, **Usine Sartigan inc** will collect personal information directly from the person concerned. In the event that you provide us with information about another person, you must ensure that you have obtained consent for such communication of information. By voluntarily providing us with your personal information, you consent that **Usine Sartigan inc** may collect, use and share it in accordance with this policy.

Your consent is valid only for the duration necessary to achieve the purposes for which it was requested. Consent must be manifest, free and informed and given for specific purposes.

You can change or withdraw your consent for the use of your personal information by contacting our Privacy Officer, whose contact details are identified below. If you refuse to provide certain personal information, we may not be able to provide you with our services or products, since certain information are essential to the business relationship, we have with you.

Collect

We strive to limit the amount of personal information we collect, use and share to only that which is necessary and appropriate for the purposes identified prior to collection, unless the law allows us to process them otherwise. In the event that we need to use or disclose your personal information for purposes other than those for which it was collected, we undertake to obtain your prior consent.

Collection methods

When you provide us with personal information, you agree to the way in which we collect, use, disclose and manage that information, as described in this policy.

In particular, we may collect your personal information in the following situations, if applicable:

- You complete an information request or account opening form;
- You participate in one of our contests or promotions, or respond to one of our surveys;
- You subscribe to our newsletter to receive our communications;
- You contact us by telephone, e-mail, in person or otherwise;

Use

We collect personal information to respond to your requests and to offer you our services in order to complete the file properly. In addition, we collect it to for the conduct of our business as well as to administer and perform our services.

If we use your personal information in contexts other than those described in this Privacy Policy or those permitted by applicable law, [Usine Sartigan inc](#) will contact you.

Communication

We may share your information with service providers with whom we do business.

Our service providers undertake through confidentiality agreements with us to protect your personal information against unauthorized access, use or disclosure. Also, our service providers are not authorized to communicate your personal information to third parties. It is also possible that these service providers store your information outside of Quebec.

Your personal information will not be used or disclosed for purposes other than those for which it was collected, in accordance with our current policy, except with your consent or as required or permitted by law. Specifically, if sensitive personal information about you is used for purposes other than those initially intended, you will be informed and given the opportunity to provide your explicit consent prior to such use. Apart from the uses authorized by our policy or the law, we undertake not to disclose, sell or transfer your information to third parties, nor to exchange it with third parties.

Limited access

Access to your personal information is limited to employees and representatives of [Usine Sartigan inc](#) who need to know the information in order to perform their duties. In addition, the information concerned must be necessary for the employee to perform his functions or to execute his mandate.

Protection of your information

We strive to maintain reasonable material, technical and administrative safeguards in accordance with generally accepted industry standards to protect personal information against loss, theft, access, disclosure, copying and use without authorization. For example, the personal information

we collect is kept in a secure environment and the people who work for us are required to respect the confidentiality of your information. To ensure the security of the personal information, we use the following measures:

- Access management - granted to concerned individuals only;
- Regular software updates to guarantee confidentiality;
- Updating firewalls and antivirus software;
- Password management and automatic locking policy for technological devices;

We are committed to maintain a high degree of confidentiality wherever possible by incorporating the latest technological innovations to ensure confidentiality. However, since no mechanism offers maximum security, a degree of risk is always present when using the Internet to communicate personal information. You acknowledge that unprotected e-mail communications over the Internet may be intercepted or altered. Therefore, we assume no responsibility for the personal information you transmit, nor for its use or misuse by you or third parties. You must also be cautious and diligent in handling and disclosing your personal information.

In the event that a confidentiality incident occurs, we will take the necessary measures to minimise the risk of harm and we will comply with the obligations of applicable law. Specifically, we will inform you to the extent required by law if a privacy incident has occurred concerning your personal information.

Conservation

Your personal information is located at all times in Quebec. Once the purposes for which personal information was collected or used have been accomplished, it is destroyed or anonymized, subject to the retention period provided by law, in accordance with this policy or to comply with the requirements of the applicable laws.

Once the retention period has expired, we ensure that your personal information is destroyed by secure means in accordance with applicable best practices, and permanently.

Personal information may be anonymized when it is reasonably anticipated in the circumstances that it will no longer allow a person to be identified, directly or indirectly, in an irreversible manner. The conservation of anonymized information is conditional upon its use for serious or legitimate purposes. Information may be destroyed at any time. Anonymization will be possible in exceptional cases and for specific purposes only.

Your rights regarding your information

You may request access to your personal information and/or about the collection, use and disclosure of such information by contacting the Privacy Officer designated in the next section, in writing. Here are the rights you may exercise:

- The right to request access to and receive a copy of the personal information we hold about you;
- The right to request the correction of false, inaccurate, incomplete, ambiguous or erroneous personal information we hold about you;

- The right to demand the rectification or destruction of personal information whose collection, communication or retention is not authorized by law or not justified in the context of the file;
- The right to withdraw your consent to the disclosure or use of your personal information;
- The right to demand that the disclosure of personal information about you cease or that any hyperlink attached to your name allowing access to this information by technological means be in-indexed in certain circumstances;

You can also help **Usine Sartigan inc** maintain the accuracy of your information by informing **Usine Sartigan inc** of any changes regarding your personal information.

Privacy officer

Questions, concerns, complaints and requests regarding this Privacy Policy may be addresses to **Mrs Mylène Villeneuve**, Privacy Officer, at the following e-mail address: mylene.villeneuve@sartigan.com

You may also contact the Privacy Officer to exercise your rights regarding your personal information as described in the previous section. Please note, however, that we will only consider a request for access or rectification of your personal information if it is made in writing, by a person who can prove his or her identity as the person concerned, in accordance with the applicable laws.

In all cases, we undertake to contact you within 30 days of receiving your request.

This policy may be amended by **Usine Sartigan inc** from time to time, and at its sole discretion, without prior notice. The collection, use and disclosure of personal information are governed by the latest version of this policy.