



PRIVACY POLICY

18 July
2024



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1. Preamble

Confort Expert recognizes the importance of privacy and is committed to protecting the personal information it collects and processes during its activities.

2. Purpose of this policy

The Privacy Policy (hereafter referred to as the "**Policy**") describes the personal data protection practices applied by Confort Expert with respect to personal data collected in the course of its activities. This policy has the following objectives:

- Protect the personal information collected by Confort Expert throughout its lifecycle, from collection, use, disclosure, storage to destruction or anonymization, in accordance with applicable legislation.
- To define the policies and principles that will effectively guarantee the protection of personal information processed within the framework of Confort Expert's services.
- Ensure compliance with applicable legal and regulatory requirements, including the law on the protection of personal information in the private sector and recognized practices in the protection of personal information.

3. Definitions

Personal Information means any information that relates to an individual and allows that individual to be identified, directly or indirectly.

Sensitive Personal Information means any personal information that creates a high degree of reasonable expectation of privacy, particularly because of the potential harm to the individual in the event of a breach of confidentiality. Examples: financial information and biometric information.

4. Personal Information Collected

Responsibility: Confort Expert is responsible for the processing of personal information in its possession, including information entrusted to third parties. In order to ensure the application of this policy and the compliance of Confort Expert with the laws and regulations relating to personal information, Confort Expert has appointed a person responsible for the protection of personal information, whose contact details can be found in section 11.

Identification of purposes: Confort Expert must determine in advance the reasons for collecting, using, disclosing and/or retaining personal information. Confort Expert ensures that it collects only the personal information that is necessary to achieve the stated purposes. The purposes for which Confort Expert collects your personal information are specified at the time of collection. You may also be informed of these purposes upon request. au moment de la collecte. Vous pourrez également être informé de ces fins sur demande.

Collection: Confort Expert collects personal information directly from the person concerned, unless consent has been obtained to collect personal information from third parties or the law authorizes it to collect it otherwise.

Directly from you: the personal information we collect directly from you is that which you provide when you communicate with us, in particular to use our products and services or to apply for a job.

5. Consent

Except for the exceptions provided for by law, Confort Expert ensures that it obtains the consent of the data subject by informing him in advance of :

- The purposes for which their personal data will be collected;
- The means by which it will be collected;
- The right to access and rectify their personal information;
- The categories of third parties to whom it may be disclosed;
- The possibility that their personal information may be disclosed outside of Quebec, if applicable;
- The right to withdraw their consent to the use and disclosure of their personal information, subject to legal restrictions.

Confort Expert obtains appropriate consent based on the nature of the personal information collected and the purposes of the collection. In general, consent must be explicit. It must be expressly given in the following cases :

- When the sensitive personal information collected is to be used for a purpose other than that for which it was originally collected, subject to the exceptions provided by law;
- When the collection is carried out using a technological solution, including any solution with features that allow the identification, localization or profiling of an individual.

Confort Expert limits the use of personal information to the purposes for which it was collected and to which the individual has consented, subject to the exceptions provided by law or to obtaining new consent.

Category of data subject	Purposes of collection
Clients of the services offered by Confort Expert	<ul style="list-style-type: none"> • Confirm your identity, verify the accuracy of your personal information and update it as necessary; • Provide support and assistance; • Provide our products and services; • Manage complaints; • Analyze data and compile statistics; • Send commercial and promotional communications; • Communicate with affected individuals; • Detecting and preventing fraud and other illegal activities; • Manage risk, security and compliance; • Administer job applications and employment relationships; • Comply with legal and regulatory requirements; and • Respond to requests for information.
Applicants for a position at Confort Expert	<ul style="list-style-type: none"> • Évaluer - Evaluate your application; • Keep the results of your application evaluation for 1 year for future reference; • Communicate with you; • Comply with our legal and regulatory obligations.
Any other person	<ul style="list-style-type: none"> • Respond to your requests by phone, email or mail. • Make courtesy calls.

Confort Expert discloses your personal information only after obtaining your consent according to applicable requirements or without your consent in certain cases provided by law, such as in the context of a criminal or penal prosecution.

Any request to revoke consent must be addressed to the Data Protection Officer whose contact details are given in section 11.

6. Access and disclosure of personal information

Your personal information is accessible only to Confort Expert employees who need access to it in order to carry out their duties. Access to personal information is granted according to the principle of least privilege, based on the role and responsibilities of the employee.

Confort Expert may also disclose your personal information to public bodies for the purposes described above or to public authorities as required by law.

Confort Expert undertakes not to disclose personal information to other third parties, except in the following cases :

- The law requires it;
- The disclosure of personal information to a third party is required for legal proceedings;
- The disclosure of personal information to a third party is necessary to prove or protect the legal rights of Confort Expert;
- The disclosure of personal information to a third party is necessary for Confort Expert to fulfill its mission.

The categories of third parties to whom Confort Expert may disclose your personal information are as follows :

- A person acting on your behalf with your consent;
- A sub-contractor with whom Confort Expert works in order to provide its products and services;
- A service provider, including technology solution providers;
- Law enforcement authorities when we have personal information about a person who has committed a crime and whose personal information is necessary to prosecute that person;
- The Commission d'Accès à l'Information (Data Protection Commission) and any person authorized by law to receive such information.

7. Retention of personal information

Confort Expert uses facilities and service providers to ensure the secure storage of your personal information to preserve its confidentiality.

Confort Expert guarantees the accuracy of the personal information collected and kept during its activities. The principle of accuracy aims to reduce the possibility of inappropriate information being used to make decisions about a person. The person concerned by the personal information collected by Confort Expert has the right to have it rectified, if necessary.

Your personal information will generally be kept in Quebec. However, it is possible that the disclosure of personal information to certain technology solution providers may result in its transfer outside of Canada. In such cases, Confort Expert :

- Will conduct the necessary risk analysis regarding the protection of personal information;
- Will validate in advance the laws and practices applicable to the protection of personal information in the destination country and ensure adequate protection of your personal information;
- Will inform you, at the latest, at the time of collection of the personal information.

Confort Expert will keep your personal information for the time necessary to achieve the purposes for which it was collected and to comply with its legal obligations, which may sometimes justify longer retention periods.

When the personal information collected is no longer necessary for the purposes for which it was collected, Confort Expert destroys or anonymizes it.

8. Personal information protection measures

Confort Expert applies security measures proportionate to the sensitivity of your personal information to protect it against loss or theft and unauthorized access, disclosure, copying, use or modification, in accordance with applicable legislation. The security measures applied by Confort Expert include :

- Regular monitoring of security threats to your personal information;
- Physical measures, such as restricting access to the sites where Confort Expert's services are hosted and to the premises where Confort Expert's employees work;
- Technical measures, such as the implementation of passwords or two-factor authentication mechanisms for access to Confort Expert's systems and Internet networks,

limiting access to your personal information by applying the "need to know" principle, setting up alerts for suspicious events, and securely encrypting communications;

- Implementing a training and awareness program for all Confort Expert employees on information security and the protection of personal information, including mandatory annual training.

In addition, all Confort Expert employees have committed to respect the confidentiality of the information to which they have access, in particular that of Confort Expert members and employees, by signing a confidentiality agreement at the time of their recruitment.

Although Confort Expert implements several security measures in order to adequately protect your personal information and to minimize the risks of breaches, a risk always remains and prevents us from guaranteeing 100% that your personal information will not be subject to a breach of confidentiality or integrity in the event of a violation of our physical, technical or administrative security measures. If you have reason to believe that personal information has been compromised, please contact the Office of the Data Protection Officer, whose contact information is provided in Section 11.

9. Your rights regarding your personal data

Confort Expert respects the rights granted to you by law with respect to your personal information and therefore implements procedures to handle the following requests

Access and rectification of your personal data : You may access the personal information that Confort Expert has collected about you, verify its accuracy and request its modification, subject to the exceptions provided by law. Your request for access or rectification must be sent to the office of the Data Protection Officer at the contact details indicated in section 11 and will be processed no later than thirty (30) days following receipt of your written request to Confort Expert and its confirmation of acceptance.

Withdrawal of consent : In certain circumstances, you may withdraw your consent to the processing of your personal information. Any request to withdraw consent must be made in writing to the Data Protection Officer whose contact details are set out in section 11.

Automated processing : Confort Expert does not engage in decision-making processes based solely on automated processing (without human intervention) of your personal information.

If Confort Expert should carry out a decision-making process based solely on automated processing (without human intervention) of personal information, you will be informed that you are subject to such a process, of the decision taken and of your right to present your observations regarding this decision. You may also request the following information :

- The personal data used to make this decision;
- The reasons for the decision;
- Your right to have the personal information used to make this decision corrected.

Complaints: If you believe that your rights regarding the protection of personal information have not been respected by Confort Expert, you may file a complaint with the Personal Information Protection Officer, whose contact information is provided in section 11.

10. What should I do if I have a question about my personal information?

Any questions regarding your personal information should be directed to the Data Protection Officer, whose contact details are set out in Section 11, for processing and follow-up.

11. Personal Information Protection Officer

The Personal Information Protection Officer is responsible for ensuring compliance with and implementation of the Private Sector Privacy Act and, as such, is also responsible for compliance with this Policy.

The contact details of the Data Protection Officer are as follows :

Postal address: 9771 Boulevard Métropolitain Est, Anjou, QC, H1J0A4

E-mail address: confidentialite@confortexpert.com

12. Updates and Notification of Changes

This policy may be modified from time to time to ensure Confort Expert's compliance with the law and to take into account any changes in the personal information collection process.

Any changes to this policy will be preceded by a notice specifying :

- The general purpose of the changes made to the Privacy Policy; and
- The effective date of such changes.

Privacy Policy

	PROJECT POLICY ON ACCESS TO INFORMATION AND PROTECTION OF PERSONAL INFORMATION	
	Effective date	2024-05-01
<input checked="" type="checkbox"/> All employees <input type="checkbox"/> All administrative staff <input type="checkbox"/> Management staff	Revised on	2024-07-18
	Replaces all previous documents and statements on this topic.	