PO1-09en Privacy Policy

Coffrages Synergy Formwork (incorporated in Québec under the legal name 9090-5092 Québec Inc.) together with its affiliates, subsidiaries, and related companies (collectively referred to as « **Coffrages Synergy Formwork** », « **our** », « **we** » et « **us** ») is a construction company specializing in concrete formwork. This privacy policy describes how we process Personal Information (the "Policy").

The purpose of this Policy is to ensure the protection of Personal Information and to tell you why and how we collect, retain, use, disclose and destroy (collectively « **Collection** » « **Retention** » and any conjugated form thereof) Personal Information. The way in which we treat Personal Information may evolve over time to keep pace with technological developments, legislative changes and other developments. We will therefore update this Policy from time to time to reflect any changes in our personal information management practices.

1. LEGAL FRAMEWORK

This Policy complies with the legal requirements applicable to Coffrages Synergy Formwork as a private company in the course of its activities, including the following laws :

-Act Respecting the Protection of Personal Information in the Private Sector.

-Act to Establish a Legal Framework for Information Technology.

2. SCOPE AND DEFINITION

This Policy applies to all Coffrages Synergy personnel, including its directors, employees, managers, administrators, consultants, subcontractors, volunteers, and anyone else providing services on behalf of Coffrages Synergy Formwork who, in the course of these services, has access to personal information, It covers all Personal Information held by Coffrages Synergy Formwork, regardless of the form in which it is accessible, whether written, graphic, audio, visual, digital, etc. The Policy also applies to any website or online platform owned or controlled by Coffrages Synergy Formwork that collects Personal Information.

Within the framework of this Policy, « you », « your », « yours » refer, without limitation, to any individual, whose Personal Information is retained by Coffrages Synergy Formwork.

For the purposes of this Policy, « **Personal Information** » means information that can be used to directly or indirectly identify an individual

3. COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

3.1. Why does Coffrages Synergy Formwork collect your personal information?

As part of its activities, Coffrages Synergy Formwork may collect different types of information for various purposes: (1) to determine whether Coffrages Synergy Formwork will establish an employment or business relationship with an individual, (2) in the course of an employment or business relationship (3)



when we collect personal information to obtain certifications, if applicable, (4) to access certain services or to gain access to specific work sites."

The Personal Information collected by Coffrages Synergy Formwork is confidential and is not disclosed to anyone, except with the explicit or implied consent of the individual concerned, or when required or permitted by law. Each case is unique, making it impossible to provide an exhaustive list of all types of information that Coffrages Synergy Formwork may collect, use, or disclose. However, the information that may be collected can include the following:

- Identification Information : full name, photo ID, date of birth, work permit, birth certificate, passport;
- Contact Information : residential address, phone number, email address;
- Education and employment information : competency certificate, training, diploma, former employers, professional licence;
- Medical information : known medical history, known physical restrictions or disabilities;
- Financial information : void check, social insurance number;
- Statistical Information : gender, ethnic origin;
- Any other personal information voluntarily provided by the individual.

In certain cases, we collect personal information from third parties, such as legal and regulatory authorities, government agencies, credit reporting agencies, recruitment or staffing agencies, service or information providers, and other public registries.

In specific situations, Coffrages Synergy Formwork may also collect personal information from third parties without the individual's consent if it has a serious and legitimate interest in doing so and:

A) the collection is in the individual's interest, and it is not possible to collect the information directly from them in a timely manner, or;

B) the collection is necessary to ensure the information is accurate

3.2. How Coffrages Synergy Formwork uses or discloses your Personal Information?

Coffrages Synergy Formworks uses and discloses your personal information only for the purposes outlined in this Policy. At no time does Coffrages Synergy sell the personal information it holds.

We may use and disclose your personal information for the following purposes:

- Identifying the individual before entering into an employment or business relationship;
- Contacting the individual for reasons related to the employment or business relationship;



• Assessing the requirements for employment or business relationship, including reference checks for employment or business relationships;

• Processing payroll, producing tax statements, paying your salary, and handling billing;

• Being able to contact emergency contacts in the event of a work-related accident or other urgent situations;

• Ensuring the employee has no prior illness or pre-existing disability that could pose work-related risks;

• Creating required statistics to meet certain standards, governmental requirements, or other obligations;

- Obtaining government or recognized certification standards;
- Keeping internal records as required by law in certain circumstances;
- Ensuring that the information we hold is accurate and up to date;
- Fulfilling our insurance requirements
- Ensuring safety and crime prevention;
- Complying with professional standards;
- Collecting debts;
- Any purposes permitted or required by law;
- Any other purposes to which you have implicitly or explicitly consented.

Coffrages Synergy Formwork allows certain authorized third-party providers to track and retain certain information regarding visitors to our websites (including domain names, IP addresses, and pages viewed). In such cases, we ensure that third-party providers adhere to strict rules regarding the protection of personal information, and these obligations are documented in a written contract. Coffrages Synergy Formwork ensures that the information it holds is up-to-date and accurate at the time it is used to make decisions concerning the individual.

Coffrages Synergy Formwork may only use personal information for the purposes stated herein or for any other purposes provided during collection. However, in certain cases permitted by law, Coffrages Synergy Formwork may use the information for secondary purposes without the individual's consent, such as:

- When this use is clearly in the benefit of the individual;
- When necessary to prevent or detect fraud;
- When necessary to assess or improve security and protection measures.

We may also disclose personal information to companies that provide services to us. We will only provide personal information to these companies if they agree by contract to ensure appropriate protection of your information and commit to complying with this Policy.

Finally, personal information may be transferred to an organization as part of a business transaction, such as a merger or change in company ownership.

3.3. Limits on the Collection, Use, Disclosure, and Retention of your Personal Information – Destruction of your Personal Information

The method of collecting personal information may vary (paper, electronic, fax, graphic, audio or visual recording, etc.). However, you will be informed of the method used when the collection occurs, as well as the purposes for which the collection is made.

At all times, information will only be retained for as long as necessary (1) for the purposes for which it was collected, (2) to comply with applicable legal obligations, and (3) for necessary, serious, and legitimate purposes. Once the purposes for which the personal information was collected have been fulfilled, or when the legal obligations have expired, Coffrages Synergy Formwork will proceed with the destruction, deletion, erasure, or anonymization of the information.

Coffrages Synergy Formwork does not target minors¹, and more generally, Coffrages Synergy Formwork does not intentionally collect personal information about minors (in such cases, information cannot be collected without the consent of a parent or guardian)."(AJOUTER la reference moins de 14 ans)

3.4. Website and Cookies

Visiting our website does not require you to provide your personal information. If you visit our site without providing your personal information, it is still possible that we may retain certain analytical data. When you visit our website, certain information may be collected, such as your IP address, your geographic region, data on your navigation on our site, the date and time of your visit, information about the device and network used to access our site, the web browser used, the links you click on within our site, any downloads or other errors, and the duration of your visit. For more information on how we use cookies, please refer to our <u>Cookie Policy</u>.

4. CONSENT

Coffrages Synergy collects personal information directly from the individual concerned and with their consent, unless an exception is provided by law.

Consent may be obtained implicitly in certain situations, such as when the individual decides to provide their personal information after being informed of the purposes for which the information is collected and how it will be retained.

¹ Under the <u>Act respecting the protection of personal information in the private sector</u>, a minor refers to a person under the age of 14.



Consent may also be obtained explicitly, such as by taking an action, such as signing a document, checking a box, or providing verbal consent.

You may withdraw your consent to the collection, use, and disclosure of your personal information at any time. However, please note that certain business, employment, or service relationships may not be continued if the information is necessary for the maintenance and performance of those relationships.

Coffrages Synergy Formwork also obtains the consent of the individual concerned before collecting their personal information from third parties, before disclosing it to third parties, or for any secondary use of that information.

However, Coffrages Synergy Formwork may act without the consent of the individuals concerned in certain cases provided by law.

5. RETENTION AND SECURITY

Coffrages Synergy Formwork implements various measures to limit access to your personal information to only those employees and individuals within the organization who are authorized to access it and for whom the information is necessary for the performance of their duties.

Your personal information is generally stored in Quebec; however, some information may be stored outside Quebec, for example, if we use data storage services with servers located outside Quebec. As a result, your personal information may be subject to the laws of foreign jurisdictions, including any laws authorizing or requiring the disclosure of information to the government, government agencies, courts, and law enforcement authorities in that jurisdiction. We only share personal information with third parties outside Quebec or Canada if we are confident that they will benefit from adequate protection in the foreign jurisdiction.

6. RIGHTS OF ACCESS AND RECTIFICATION OF YOUR PERSONAL INFORMATION

Coffrages Synergy Formwork strives to ensure that all personal information it holds is as accurate and up to date as possible.

You have the right to request access to your personal information and to request its correction if it is inaccurate. To exercise these rights of access and rectification, you must submit a written request to the person responsible for the protection of personal information at Coffrages Synergy Formwork at the following address: privacy@synergy.ca.

7. RIGHT TO DATA PORTABILITY

You have the right to request that the electronic personal data we hold about you be provided to you upon request in a structured, commonly used, and machine-readable format. To exercise this right to data portability, you must submit a written request to the person responsible for the protection of personal information privacy at Coffrages Synergy Formwork at the following address: privacy@synergy.ca

8. PUBLICATION AND MODIFICATION

This Policy is published on the Coffrages Synergy Formwork website. We will update this Policy from time to time to reflect any changes in our personal data processing practices or any legislative changes. In the event of any modification, a notice will be posted on our website.

Your continued access to or use of our website or the provision of your personal information after any modification to this Policy constitutes acceptance of and consent to the terms of the modified Policy.

Coffrages Synergy Formwork will publish all changes made to this Policy, which will be subject to a notice to inform individuals.

Version and modification table :

Version	Effective date	Modifications since last version
1.0	22 septembre 2023	N/A – First version

9. CONTACT US

For any questions, complaints, or comments regarding this Policy, or if you wish to:

- Access personal information you have previously provided in order to correct or update it, or to request its deletion;
- Report any violations of this Policy;
- Report any privacy-related incidents.

You can contact the person responsible for the protection of personal information at the following email address: <u>privacy@synergy.ca</u>

By mail :

Person responsible for the protection of personal information - Coffrages Synergy Formwork Annie Robichaud 53 chemin de Lavaltrie, Lavaltrie, (Québec), J5T 2H4 6