

Protection Policy personal informations

OBJECT AND PURPOSE OF THE POLICY

St-Pierre & Associés is a consulting engineering firm offering cost control and analysis services as well as a wide range of services related to building science. St-Pierre & Associés collects, uses and could potentially disclose personal information for the purposes of operating its activities.

In order to ensure the confidentiality of the personal information thus obtained, St-Pierre & Associés submits itself to the most rigorous ethical standards when processing such information, particularly personal information.

The purpose of this Policy is to help you better understand the business practices of St-Pierre & Associés in terms of collection, use, disclosure and retention of personal information. By agreeing to provide personal information, whether through the St-Pierre & Associés website or directly to a member of the firm's staff, all by email, in person or by telephone, you agree that your personal information is processed in accordance with what is indicated in this Policy and you authorize St-Pierre & Associés, their representatives and their service providers to process your personal information for the purposes set out below, all subject to the right professional secrecy applicable to the engineer-client relationship, which takes precedence at all times over this policy.

EXCLUSION OF THIRD PARTY SITES

This Policy does not apply to third party websites which can be accessed if you click on links found on the St-Pierre & Associés website, if applicable, and the latter is not assumes no responsibility for such third party websites. If you follow a link to a third party website, that third party will have its own privacy policies which you should review before submitting any personal information.

PERSONAL INFORMATION COVERED

St-Pierre & Associés may, as part of its activities, collect and process different types of personal information, such as in particular and not limited to:

- Professional and/or personal contact details, such as first name, last name, address(es), email address(es), date of birth and telephone number(s);
- Biographical information such as job title, employer name, professional and/or personal background, photos and video or audio content;
- Information relating to marketing and communications preferences, as well as related information such as comments and survey responses;
- Billing and financial information, such as billing address, bank account information or payment data;
- Service-related information, such as details regarding services provided to you;

- Information on your professional background, your networks, your social involvement, your professional affiliations, etc.;
- Information relating to recruitment, such as a curriculum vitae, information on education and professional history, details concerning professional affiliations and other information relevant to potential recruitment within St-Pierre & Associés;
- Website usage information and other technical information, such as details about visits to our website, your interaction with our advertising and online content, or information collected through cookies and other tracking technologies;
- Any other personal information provided. Please note that if you provide us with personal information about other people (such as your customers, directors, officers, shareholders or beneficial owners), you must ensure that you have properly notified them that you are providing their information. and to have obtained their consent to such communication of information;
- Where applicable, evidence of consent given to us (date, time, means), in circumstances where such consent is necessary for the processing of personal information.

HOW PERSONAL INFORMATION IS SHARED

You share your personal information with us in particular in the context of the following commercial operations:

- When opening a file;
- During the provision of services that we provide to you.

POTENTIAL USE OF PERSONAL INFORMATION

With your consent or, where applicable, according to another authorized legal basis, St-Pierre & Associés may use your personal information by indicating to you for what reasons your personal information is used:

- In order to provide services as well as for the conduct of business, to administer and perform services, including to carry out obligations arising from any agreement entered into with you;
- In order to facilitate the use of the St-Pierre & Associés website and to ensure that the content is relevant and to ensure that the content of its website is presented in the most effective manner;
- For marketing purposes to provide details of new services, information, training, seminars and events, etc. when an individual has opted in to receive such information;
- For research and development purposes (including from a security point of view) to carry out analyzes to better understand the requirements of St-Pierre & Associés' customers in terms of service and marketing;

- For recruitment purposes to assess whether a person meets the requirements of the position;
- In order to meet legal, regulatory or risk management obligations;
- To prevent fraud and/or conduct other background checks that may be required at any time under applicable law or regulation and/or best practices (if false or inaccurate information is provided or if fraud is observed or suspected, information may be transmitted to fraud prevention organizations and may be recorded by us or by such organizations). When St-Pierre & Associés processes personal information of special categories, it may also be based on elements of important public interest, such as the prevention or detection of crimes, or claims founded in law;
- To enforce the rights of St-Pierre & Associés, to meet its legal or regulatory obligations regarding the communication of information or to protect the rights of third parties;
- To ensure to be paid by collecting payments owed to it and, if applicable, to enforce such collections by using debt collection agencies or by other legal means, including by taking legal action;
- In order to reorganize or modify its business, such as a reorganization or merger, involving having to transfer some or all of the personal information to an applicable third party (or to advisors) as part of any due diligence or review process transfer to such reorganized entity or third party for the same purposes as set forth in this Policy or for the purposes of analyzing any proposed reorganization. All possible means to ensure the protection and security of personal information will then be deployed.

THIRD PARTIES COVERED BY THE SHARING OF PERSONAL INFORMATION

St-Pierre & Associés may share personal information with third parties, subject to respect for professional secrecy, in particular the following:

- Employees of the company for the purposes of providing the requested services or to recruit human resources;
- Government authorities and law enforcement agencies where required by applicable laws;
- Third party service providers and/or partners, including those who provide us with database analysis, website analysis, application development, hosting, maintenance and other services.

These third parties may have access to personal information or process it as part of the services they provide to St-Pierre & Associés. The information provided to these service providers will be limited to only that information that is reasonably necessary to enable them to carry out their functions. And contracts concluded with these service providers must require them to maintain the confidentiality of this information;

St-Pierre & Associés uses the services of third-party sites, such as Google, LinkedIn and Facebook, to promote its content and offers.

When you visit the St-Pierre & Associés website, these third parties may use cookies, web beacons or other similar technologies on your hard drive to collect or receive information about your browsing on the website and elsewhere on the Internet. These technologies make it possible to deliver relevant and targeted advertisements based on your interests.

You can view cookies and destroy them if you wish. You therefore have full control by referring to your browser settings to make the appropriate modifications.

PERSONAL INFORMATION STORAGE DURATION

St-Pierre & Associés will only retain personal information for the duration necessary for the purposes provided for in this Policy and to comply with its legal and regulatory obligations.

To find out more about how long we retain personal information, please contact the Responsible Person responsible for this Policy.

PLACE OF STORAGE AND METHOD OF DATA TRANSFERS OUTSIDE QUEBEC

St-Pierre & Associés uses customer relationship management IT technologies to manage, retain and maintain all relationships and interactions with its current and potential customers, suppliers, subcontractors and partners.

For legal and fiscal reasons, documents and personal information may also be kept in a secure location dedicated to the archives of St-Pierre & Associés.

St-Pierre & Associés does not transfer any data, whether confidential or not, outside the province of Quebec, except at the specific request of a client to carry out the mandate entrusted.

PERSONAL INFORMATION PROTECTION MECHANISM

St-Pierre & Associés follows the most rigorous standards generally recommended in its sector to protect the information submitted to it, both at the time of transmission and once it has been received.

These physical, technical or administrative safeguards are appropriate and are intended to protect personal information against accidental or unlawful destruction, accidental loss, modification, unauthorized disclosure or access, misuse or any other illegal form processing of personal information in the possession of St-Pierre & Associés.

Measures have been taken to ensure that the only staff members who have access to your personal information are those who have a need to know it or whose duties reasonably require that information be known.

If you have reason to believe that personal information has been compromised, please contact the Person Responsible for this Policy.

If a confidentiality incident occurs affecting your personal information, St-Pierre & Associés undertakes to notify you as soon as possible following its knowledge of this incident, in addition to taking reasonable measures to reduce the risks that harm is caused and prevent new incidents of the same nature from occurring.

YOUR RIGHTS

You have the right to:

- ask if St-Pierre & Associés processes information about you and, if so, request access to personal information.
- request that St-Pierre & Associés take reasonable measures to ensure that the personal information in its possession is accurate, complete, not misleading and up to date;
- request rectification of any incomplete or inaccurate personal information that St-Pierre & Associés holds;

- request to stop disseminating your personal information or to deindex any hyperlink attached to your name giving access to information if this dissemination causes you harm or contravenes the law or a judicial order (right to erasure or oblivion);
- request that the personal information used by St-Pierre & Associés be anonymized, subject to the laws and regulations applicable to the keeping of records by an engineer, member of the Order of Engineers of Quebec;
- to be informed when you are the subject of a decision based exclusively on automated processing;
- to be informed when using identification, location or profiling technology and the means offered to activate these functions;

Finally, it is also possible to file a complaint with a data protection supervisory authority, specifically in the country, province or state in which you normally reside. This organization in the province of Quebec is the Commission for Access to Information.

To exercise any of these rights, please contact the Person responsible for this Policy.

USE OF COOKIES AND SIMILAR TECHNOLOGIES

For detailed information about the cookies we use, please refer to our Cookies Policy below (“Cookies”), which forms part of this Privacy Policy.

COMMUNICATION AND RESPONSIBLE PERSON

To ask questions, make comments or make a complaint regarding this Policy or regarding personal information, exercise your rights, file a complaint or obtain information, contact the person responsible for data protection. personal information by email at rene.paquin@stpierreassociates.com, by telephone at 450-806-9235 or by mail to the following coordinates:

St-Pierre & Associés - Attention: Mr. René Paquin

Person responsible for the protection of personal information

9001, Boulevard de l'Acadie, bureau 901, Montréal (Quebec) H4N 3H5

POLICY UPDATE

Changes may be made to the content of the St-Pierre & Associés website and its use of cookies without notice and, therefore, this Policy may be modified from time to time in the future.

This Policy was last updated on September 22, 2023.

COOKIES POLICY

By using the St-Pierre & Associés site, you consent to the use of cookies in accordance with this cookie policy. You will have seen an invitation to this effect on your first visit to this website; although it is not usually displayed on subsequent visits, you can withdraw your consent at any time by following the instructions below.

DISABLE COOKIES

When the organization setting the cookie offers an automatic deactivation tool for this or these cookies, the name of this organization will be indicated, the category of cookies it sets as well as a link to its automatic deactivation tool will also be displayed.

In all other cases, the name of the cookies themselves and their source as of the date of this policy will be indicated so that you can easily identify them and disable them if you wish using your browser controls.

If you do not accept the use of these cookies, please disable them by following the instructions for your browser set out at the following site: [All about computer cookies | All About Cookies](#), or use an automatic opt-out tool, if available. However, some services will not work as well if cookies are disabled.

After your initial visit to this website, St-Pierre & Associés may modify the cookies it uses. This Cookie Policy will always let you know who sets cookies, for what purpose and how to disable them if you check it from time to time.

COOKIES USED BY ST-PIERRE & ASSOCIATES

The categories of cookies used by St-Pierre & Associés and its suppliers are described below.

STRICTLY NECESSARY COOKIES

These cookies are essential to enable you to navigate the website and access its features.

Without these cookies, the services you request (such as navigation from one page to another) cannot be provided.

PERFORMANCE COOKIES

St-Pierre & Associés uses analytics cookies to analyze how its visitors use its website and to monitor website performance. This helps ensure a high-quality experience by personalizing your offering and quickly spotting and correcting any issues.

WEBSITE FUNCTIONALITY COOKIES

St-Pierre & Associés also uses cookies to provide you with certain functionality, such as remembering choices you make (such as your username, language or region) or to recognize the platform from which you access the site and to provide you with enhanced and more personal features. These cookies are not used to track your browsing on other sites.

TARGETING COOKIES

Targeting cookies (or advertising cookies) collect information about your browsing habits and are used to better target advertising based on you and your interests. They are used by services provided by third parties, such as the Like or Share buttons. The aforementioned “AddThis” cookies are also examples of targeting cookies. Third parties provide these services in exchange for acknowledgment that you have visited the St-Pierre & Associés website.

When you use the LinkedIn, Facebook or other available sharing buttons, you are directed to a page controlled by these companies, who may set cookies (including targeting cookies), and you will be subject to the cookie policies of those companies. LinkedIn, Facebook or another relevant website, respectively.

USE OF IP ADDRESS AND DIGITAL LOGS

St-Pierre & Associés may use your IP address and browser type to help diagnose problems affecting its server, to administer its website and to improve the service offered. An IP address is a numerical code that identifies your computer on the Internet. Your IP address may also be used to collect broad demographic information.

St-Pierre & Associés may conduct IP address checks to establish the domain you are coming from (e.g. google.com) to obtain a better picture of the demographics of its users.

Information from these types of cookies and technologies is not combined with information about you from another source and will not establish your identity.

INVISIBLE PIXELS IN HTML EMAILS AND WEBINARS

Marketing emails contain a unique “invisible pixel” specific to the campaign which notifies St-Pierre & Associés if its emails are opened and which, combined with other technology, verifies clicks on links contained in the email. St-Pierre & Associés may use this information for various purposes, including to determine which of its emails are of most interest to you and to ask users who do not open its emails if they wish to continue receiving them. The pixel will be deleted when you delete the email. If you do not want the pixel to be downloaded to your device, you should choose not to click on the links sent. This information may be linked to your personal identity.

EXCLUSION OF THIRD PARTY WEBSITES

Please note that this Cookie Policy does not apply to the privacy practices of third party websites that may be linked to or accessible from this Website, and that St-Pierre & Associés is not responsible for such practices.

CHANGES TO COOKIE POLICY

This cookie policy may be modified at any time by St-Pierre & Associés.

This Cookie Policy was last updated on September 22, 2023.

B. POLICY FOR CONSERVATION AND DESTRUCTION OF FILES

1. Objective

The objective of this policy is to provide procedures for closing, retaining and destroying client files maintained by St-Pierre & Associés.

2. Definitions

In this policy: “file closure date” means the date on which the person responsible for a file has determined that the file is closed and from which he determines the destruction of the file. “file destruction date” means the date from which a file is destroyed.

3. Review and close the file

- St-Pierre & Associés appoints someone responsible for the application of this policy. Failing this, the general management of the organization is responsible for the application of this policy.
- When a file is completed, the file manager determines the file closing date and its destruction date.
- Before closing the file and sending a physical document or other file-related property to an external storage site or shredding service, the file keeper must take steps to remove from the file, hard copies of documents which have been imaged or otherwise saved in the organization's electronic library.
- The organization keeps records identifying closed files, including the closing date and, where applicable, the destruction date.

4. Conservation of closed files

Closed and undestroyed records are stored in a physical location to maintain the confidentiality of the individuals involved and to protect them from damage or loss. They can also be stored on computer media.

5. Destruction of files

- When the person responsible for the file closes the file, and if the file is ready for destruction, the destruction date is determined according to the regulations applicable to engineers who are members of the Order of Engineers of Quebec, unless the person responsible for the file determines that another destruction date would be more appropriate.

- The destruction date must be suspended in the following cases relating directly or indirectly to: a) an actual or potential claim against St-Pierre & Associés, b) a request for disclosure of information concerning the file or client concerned, c) government audits and investigations. This may be ordered by the case manager.
- The date for destruction of records may be postponed at any time if necessary (for example, if new consent is granted in the meantime).
- This policy must be applied in such a way as to ensure that the confidentiality of personal information is maintained and that applicable federal and provincial laws regarding the protection of personal information are respected.
- The organization maintains a register of destroyed files which includes the client's name, the file number, the date the file was closed, the date the file was destroyed and the name of the person responsible for the file.

C. COMPLAINT HANDLING POLICY

This policy aims to ensure adequate, uniform and diligent processing of complaints.

It is aimed at anyone dissatisfied with the processing of their personal information.

1. Purpose of the policy

The complaints handling policy aims to establish a fair and transparent procedure to deal with complaints received by St-Pierre & Associés. It also aims to support the quality of services and provide the opportunity for anyone to express their dissatisfaction.

This document governs the receipt of complaints, the transmission of acknowledgment of receipt, the creation of the complaint file and the compilation of complaints received, with a view to listening to customers and continuous improvement.

2. Responsible

The person responsible for applying the policy is Mr. René Paquin, responsible for the protection of personal information. He acts as a respondent and ensures adequate training of staff in this regard. The manager must also provide employees with all the information necessary to comply with this policy.

The main functions of the responsible person are:

- Ensure the application of this policy;
- Ensure that an acknowledgment of receipt is sent to the complainant;
- Investigate the claims made by the complainant;
- Respond to the complainant.

3. Complaint

For the purposes of applying the policy, a complaint constitutes the expression of at least one of the following three elements:

- Dissatisfaction with St-Pierre & Associés by an individual who feels wronged;
- Damage suffered following an event, situation, act or omission with regard to the provision of the service provided by St-Pierre & Associés;
- The request for a corrective measure.

Any informal approach aimed at correcting a particular problem does not constitute a complaint, provided that the problem is dealt with within the framework of the regular activities of St-Pierre & Associés and without a written complaint having been filed by an individual.

4. Receipt of the complaint

An individual who wishes to make a complaint must do so in writing to the following address:

St-Pierre & Associés - To the attention of: Mr. René Paquin

Person responsible for the protection of personal information

9001, Boulevard de l'Acadie, bureau 901, Montréal (Quebec) H4N 3H5

The communication must indicate the following:

- The name of the complainant;
- His address;
- His telephone number;
- Their email or fax number, if applicable;
- The status of the complainant: In his personal name, as a third party;
- The reasons for the complaint submitted.

All complaints are treated confidentially. An anonymous complaint is considered not received.

Any employee receiving a complaint must forward it, upon receipt, to the person responsible for applying the policy.

Any employee who receives a verbal complaint must inform the complainant of this policy and invite them to send their complaint to St-Pierre & Associés in writing.

The manager must acknowledge receipt of the complaint within five (5) business days of receipt.

The acknowledgment of receipt must contain the following information:

- A description of the complaint received, specifying the criticism made against St-Pierre & Associés, the damage or the corrective measure requested;
- The name and contact details of the person responsible for handling the complaint;
- In the case of an incomplete complaint, a notice including a request for additional information to which the complainant must respond within a set deadline, i.e. five (5) working days, failing which the complaint is deemed abandoned;
- The complaints handling policy.

5. Creation of the complaint file

To ensure fair and transparent treatment, each complaint is the subject of a separate file. The file includes the following elements:

- The written complaint;
- The result of the complaint handling process (the analysis as well as the related documents);
- The final written and reasoned response to the complainant.

6. Handling a complaint

The process of handling a complaint is initiated within a maximum of five (5) working days of receipt.

The complaint must be processed within a reasonable time, i.e. within thirty (30) days following receipt of all the information necessary for its study.

In the exceptional event that a complaint cannot be processed within the stipulated time frame, the complainant must be informed of the reasons for the delay and the steps taken by St-Pierre & Associés to date in processing their complaint. He must also be informed of the deadline within which the decision will be transmitted.

Once the complaint has been examined and the analysis completed, the manager must send the complainant a final, written and reasoned response.

7. Entry into force

This policy comes into effect on September 22, 2023.

For any questions or comments regarding the handling of complaints, we invite you to communicate directly with the person in charge:

St-Pierre & Associés - To the attention of: Mr. René Paquin

Person responsible for the protection of personal information

9001, Boulevard de l'Acadie, bureau 901, Montréal (Quebec) H4N 3H5