

POLITIQUE DE CONFIDENTIALITÉ PRIVACY POLICY
relating to the protection of personal information collected through
technological means



Evoc
Sécurité
Inc.

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Evoc Sécurité Inc., also referred to as the "Company" in this policy, is a company operating in the sale and installation of security equipment, loss prevention services, and investigative services since 2013. In the course of its activities, the Company ensures the protection of personal¹ information it handles.

Introduction

The Act to modernize legislative provisions respecting the protection of personal information, also known as "Law 25", represents a reform of the laws governing the protection of personal information in Quebec, including the Act respecting the protection of personal information in the private sector (hereinafter referred to as the "Act"), to which the Company is subject.

The Act requires organizations to adopt and publish a privacy policy when personal information is collected through technological means. In the course of its activities, the Company collects personal information through technological means. This policy is adopted and published in accordance with the requirements of the Act.

This policy may be amended or updated to reflect internal practices and applicable laws (see the table "Effective Date and Updates" at the end of this policy).

Purpose and Scope

Through this policy, the Company expresses its commitment to the personal information under its protection and to the concerned individuals². This policy serves as a communication channel to inform concerned individuals, in a transparent, clear, and simple manner, how personal information is handled by the Company, from collection to destruction.

This policy applies to any person whose personal information is collected by the Company. It applies to the Company, its staff members, and any other person or organization³ acting on behalf of or for the Company (e.g., suppliers⁴ or subcontractors⁵).

It should be noted that certain information is not considered confidential personal information under the Act, particularly information used in the exercise of professional or business functions. Certain other types of information may also be considered public by law.

Responsibility of Concerned Individuals

It is the responsibility of each concerned individual to review this *Privacy Policy* relating to the protection of personal information.

¹ « **Personal Information**”: any information that makes it possible to identify or confirm the identity of a natural person, directly or indirectly, regardless of the form of such information or the medium on which it is contained.

² “**Concerned Individual**”: any natural person to whom personal information relates.

³ “**Staff Members**”: any person providing work services, whether on a full-time or part-time basis, on a regular or temporary, seasonal, or contractual basis, whether remunerated or unpaid.

⁴ “**Supplier**”: any supplier of services or products that is contractually bound to Evoc Sécurité Inc., whether verbally or in writing.

⁵ “**Subcontractor**”: any organization, contractor, or self-employed worker engaged by Evoc Sécurité Inc. under a contract for services, whether verbally or in writing.

If a concerned individual does not agree with this policy, in whole or in part, they are invited to contact the Person in Charge or to refrain from transmitting personal information through technological means.

Person in Charge⁶

The Company has designated **Tina Michaud**, shareholder, as the Person in Charge of the Protection of Personal Information. The Person in Charge ensures that the practices implemented regarding confidential personal information are respected at every stage of the personal information life cycle⁷.

For any questions, comments, information requests, or complaints concerning the Company's handling of personal information: vieprivee@securite-e.ca

Security Measures

The Company is committed to maintaining responsible and diligent management practices regarding personal information and to implementing appropriate and reasonable security measures to protect its confidentiality. The Company determines the appropriateness of the security measures based on various factors, including the level of sensitivity⁸ of the information involved. Personal information collected through technological means is processed in a highly secure environment. We are committed to protecting your privacy and ensuring the security of your information.

The Company implements rigorous security measures, including data encryption and restricted access to personal information within the organization.

Despite the security measures implemented, any person must be aware that the use of technology involves a continuous risk of confidentiality⁹ incidents.

⁶ **“Person in Charge”**: the individual identified in this policy as being responsible for the protection of personal information within the Company.

⁷ **“Lifecycle”**: refers to the stages in the existence of personal information within the Company, beginning with its collection and ending with its destruction, including its retention, use, and disclosure.

⁸ **“Sensitive Personal Information”**: any personal information that, in the view of a reasonable person, gives rise to a high expectation of privacy, either due to its nature (e.g., medical, biometric, financial, intimate, etc.) or the context of its use or disclosure, and which increases the risk of serious harm when its protection is compromised by a confidentiality incident.

⁹ **“Confidentiality Incident”**: any breach of the protection of confidential personal information, including its loss or any unauthorized access to, use of, or disclosure of such information.

Collection of Personal Information

The Company collects various types of personal information, through various technological means, concerning different categories of individuals. This information may include name, address, email address, telephone number, social insurance number, copy of a driver's license, void cheque, etc.

In all cases, the Company ensures that it collects only the personal information necessary to achieve the intended purpose, which varies depending on the circumstances.

Concerned Individual	Personal Information Collected	Purposes	Means of Collection Used
Potential Candidates of the Company	Last name, first name, telephone number, email addresses, physical addresses	Employee file Background checks License verification	Form Email
Company Employees	Last name, first name, telephone number, email addresses, physical addresses, Social Insurance Number (SIN), driver's licence, licenses depending on the position	Employee file Background checks License verification	Email Form
Clients	Last name, first name, telephone number, email addresses, physical address, access codes	Client file	Email Form
Potential Candidates at a Client's Site (criminal background checks)	Last name, first name, telephone number, email addresses, physical addresses, driver's licence	Background checks License verification	Email Form
Client Employees	Last name, first name, email address, telephone number	File creation	Email Form

Suppliers	Last name, first name, email address, telephone number	File creation	Email Form
Subcontractors	Last name, first name, email address, telephone number, liability insurance, licenses	File creation	Email Form

Use of Personal Information

The Company ensures that it has obtained the required consent for any use of personal information or that it is authorized to use such information without consent under the Act. Personal information may be used without prior consent, in particular when such use is compatible with the purpose for which the information was collected or when it is clearly for the benefit of the concerned individual.

Les communications des renseignements personnels

In the same manner, the Company verifies that it has obtained the individual's consent before disclosing their personal information to a third party¹⁰, tiers³ or that the Act allows such disclosure without consent.

The Company may disclose personal information without consent in certain circumstances, notably to its legal counsel, to an archive service, or where such disclosure is necessary for the exercise of a mandate or the performance of a contract related to its services. In such cases, prior to any disclosure without consent, the Company ensures that the applicable conditions are met and that the requirements set out in the Act are complied with. Furthermore, through the use of technological tools, personal information processed through technological means may be communicated outside Québec, particularly when entered into the Company's information systems, as the data collected is not stored exclusively in Québec. The Company nonetheless ensures that a Privacy Impact Assessment is conducted for any communication of personal information outside Québec, in accordance with the Act.

Hyperlinks Present on the Company's Website

During navigation on the Company's website, users may be required to use hyperlinks leading to third-party websites. The Company informs users that they will be redirected to third-party

¹⁰ "Third Party": any person or organization other than the members of the Company's staff.

websites over which the Company has no control. In such cases, the privacy policy of the relevant third-party website applies, and not that of the Company.

Users understand that the Company does not own the websites to which the hyperlinks refer and has no control over their content or operation. Consequently, it is the user's responsibility to review the policies applicable to these external websites and ensure that they agree with the manner in which their personal information is handled, particularly with respect to its collection, use, and retention.

Hyperlinks are present on the Company's website:

- The Lära LMS portal
- The training software provided by Lära LMS, known as SVlesolution,
 - which redirects the user to Stripe via an API connector at the time of payment.

Retention and Destruction

Personal information is retained in a secure manner, whether technologically or otherwise. Access is limited to individuals who need the information to perform their duties.

The Company retains personal information only for as long as necessary. Unless another legal retention period applies, personal information is securely destroyed once the purpose for which it was collected has been fulfilled.

Confidentiality Incidents

When the Company becomes aware of a confidentiality incident, the Commission d'accès à l'information and the concerned individual will be notified when the incident presents a risk of serious harm¹¹ to the individual.

¹¹ "Serious Harm": any non-negligible harm to the interests of the concerned individual or to their property.

Requests That May Be Submitted by a Concerned Individual

Concerned individuals have rights of access, rectification, and de-indexation. Accordingly, they may submit the following requests:

Access Request	A concerned individual may request that the Company confirm the existence of their personal information and obtain a copy of it. When the information is computerized, the copy must be provided in the form of a written and intelligible transcript, in a structured and commonly used technological format.
Rectification Request	A concerned individual may request that inaccurate, incomplete, or ambiguous personal information be corrected, or that personal information be rectified where its collection, disclosure, or retention is not authorized by the Act.
De indexation Request	A concerned individual may request that the Company cease the dissemination of their personal information or de index any hyperlink associated with their name that provides access to such information.

All requests must be made in writing and sent to the Person in Charge, who will first verify the identity of the concerned individual.

All requests relating to the protection of personal information are handled by the Person in Charge, and a response is provided to the concerned individual within thirty (30) days of receipt of the request. The Person in Charge provides assistance to the concerned individual at each stage of the request process, where required.

The exercise of these rights is free of charge. However, the Company reserves the right, upon prior notice, to charge the concerned individual reasonable fees related to the processing of the request, including costs associated with transcription, reproduction, or transmission.

Where the Person in Charge refuses to grant a request, the concerned individual is informed of the following:

- the legal provision on which the refusal is based;
- the remedies available to the concerned individual under the Act;
- the time limits within which such remedies may be exercised.

Complaint Handling

Any person may file a complaint, which must be made in writing and addressed and submitted to the Person in Charge. In order to be processed, the complaint must include the name and contact information of the complainant, as well as a description of the reasons for the complaint and the specific facts.

The Person in Charge handles all complaints confidentially. The Person in Charge follows up with the complainant by email within thirty (30) days from the date on which all information necessary to assess the situation has been obtained.

If additional time is required to process the complaint, the Person in Charge will inform the complainant by email before the expiry of the standard processing period.

Effective Date and Updates

This policy is approved by the Person in Charge.

The policy is published on the website www.evocsecureite.ca

Effective Date and Updates		
Version	Published on	Change(s)
1.0	May 30, 2024	n/a
2.0	February 24, 2026	Hyperlinks Present on the Company's Website

This English version is provided for information purposes only. In the event of any discrepancy, the French version shall prevail.