



Privacy Policy Relating to Personal Information Human Resources Department

SUIVI DES RÉVISION

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PREAMBLE AND CONTEXT

Techsol Marine Inc. (« [Techsol] », « we » or « our ») is committed to protecting the personal information we collect in the course of our business. This privacy policy (the "Policy") describes in clear and simple terms how we meet our privacy obligations and more specifically our practices concerning the collection, use, disclosure, retention, and destruction of your personal information. Our person in charge of the protection of personal information, whose full contact details are set out in Section 9, is responsible for ensuring that the Policy is complied with and implemented. To ensure the implementation of the Policy, please be assured that we have put in place internal practices concerning the management of your personal information. These practices include, amongst others, guidelines regarding:

- the security of your personal information;
- managing and preventing privacy incidents;
- conducting privacy impact assessments;
- retaining your information throughout its life cycle.

Our commitment to you is clear:

- Be concise, clear, and transparent;
- Obtain your consent when necessary;
- Allow you to exercise your rights regarding your personal information;
- Protect the confidentiality of your personal information.

Our Policy has been developed in compliance with applicable privacy legislation, including the Personal Information Protection and Electronic Documents Act, S.C. 2000, c. 5, the Act respecting the protection of personal information in the private sector, RLRQ, c R-39.1 and other similar provincial legislation.

WHO IS FOR AND WHAT OUR POLICY APPLIES TO

The Policy applies to personal information collected during all our activities, except for personal information we collect in respect of our directors, shareholders, consultants, employees, former employees, and applicants for employment with us. It applies notably to personal information collected when you visit our website, when you contact us by any other means of communication, or when you visit our offices. The Policy applies, for example:

- to our past, present, and future clients;
- all users of our website;
- anyone who comes into contact with us.

However, you should be aware that you remain responsible for the protection of your personal information when you consult the content of other third-party websites. Our Policy does not apply to the collection, use, disclosure, or retention of your personal information by other websites, even though certain links on our website may allow you to access the content of other third parties. We are not responsible for their privacy policies and encourage you to read any privacy notices or policies governing such third parties.

This Policy does not apply to the personal information of our employees, former employees, or applicants for employment with us in the context of their employment, past, present, or future, as another policy applies specifically to them and is available to them by contacting the person in charge of the protection of personal information.

WHAT PERSONAL INFORMATION DO WE COLLECT AND FOR WHAT PURPOSE?

Personal information means any information relating to a private individual and enabling that individual to be identified directly or indirectly, whether taken separately or in combination with other information.

Please note that we only collect personal information that is necessary to provide you with our products and services or that is required to meet our obligations under applicable laws. The personal information that may be collected includes:

- identity and contact information, such as last name, first name, email address, telephone number, and postal address;
- commercial information, such as your customer number and services provided;
- billing information, such as amounts billed and amounts owed;
- financial information, such as debit account numbers;
- information about your communications with us, such as email exchanges, messages sent via the section of our website available for this purpose, and surveillance camera recordings;
- information about your digital interactions, such as your email address, device information, clickstream, browsing histories and visit durations. (To learn more about our use of cookies, please see our Cookie Policy).

Generally, we collect your personal information to offer you our products and services and to improve them. Other than as provided for by law, if we need to use your personal information for purposes other than those set out in this Policy, we will obtain your consent before doing so.

We collect your personal information, within the limits authorized by law, to:

Identifying or authenticating yourself

When we want to register you as a new customer, we need some information to identify you. This information will be used notably to find your file and to ensure that your information is associated with your account when you wish to benefit from our products and services and the associated guarantees.

Generally, we collect identity and contact information for this purpose. Your information may also be used in some cases to authenticate you, for example, to ensure that you are the right person when you wish to access your file.

Providing you with our products and services

When you contract our services, we must process some of your information to determine your eligibility for our products and services, to provide you with appropriate advice based on your needs, to answer any questions you may have, to deal with any complaints, and to assist you in any way we can.

Communicating with us

As part of our business relationship with you, we may need to contact you from time to time to:

- following up with you;
- notify you of important changes applicable to your services;
- notify you of changes to our Privacy Policy or our Cookie Policy.

Managing our risks

As a company, we need to take certain preventive actions as part of the risk management of our activities to avoid financial losses, breakdowns in operational services, and internal and external fraud. To do so, we:

- monitor any suspicious activity;
- use video camera surveillance at our various sites;
- develop descriptive and predictive models to identify any trends that could put our organization at risk.

Meeting our legal and regulatory obligations

In operating our business and due to the nature of our activities, we must comply with certain legal and regulatory obligations. We are therefore obliged to collect your information to, for example:

- comply with the Income Tax Act;
- defend ourselves in the event of claims or legal proceedings;
- comply with the requirements of the *Autorité des marchés financiers* (AMF);
- perform due diligence.

Sending you advertising offers, promotions, or any other communications by electronic means, paper mail, or phone

To offer you a more personalized service, we may use your personal information to communicate offers likely to meet your needs.

To personalize these communications, we may analyze your personal information for profiling purposes. This allows us to avoid sending you communications that do not correspond to your expectations.

Please note that we will only send you these communications if you have, where required by law, chosen to receive them and that you can withdraw your consent at any time.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Most of the time, we collect your personal information from you directly (over the phone, through our representatives, or when you visit our offices, for example). There are, however, situations in which we may collect your personal information from other sources, after obtaining your consent or as required by law:

- From other third parties to help us serve or protect you, for example:
 - Other entities affiliated with our group
 - Our business partners
- From public databases, for example:
 - Land registers
 - Statistics Canada
 - Insurance Bureau of Canada
- Based on your use of our products and services and our website.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We are committed to protecting the personal information in our possession following industry standards. To this end, we implement reasonable security measures to protect your personal information against loss, theft, unauthorized access, disclosure, and unauthorized use. Our security measures are adapted according to the amount of personal information and its sensitivity.

MEASUREMENTS TYPES	EXAMPLES OF MEASUREMENTS
Technical measures	<ul style="list-style-type: none"> • Use of a strong internal password • Two-factor authentication • Access logging • Depersonalisation • Continuous perimeter security monitoring
Administrative measures	<ul style="list-style-type: none"> • Access management on a "need to know" basis • Internal policies and training on the protection of personal information • Our employees are bound by confidentiality agreements that extend beyond the end of their employment

Physical measures	<ul style="list-style-type: none"> • Locked filing cabinets • Access to offices restricted by access card • Surveillance cameras • Security guard on some of our sites
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Please note, however, that the transmission of personal information over the Internet is never completely secure. Although we take every precaution to protect your personal information, we cannot guarantee the security of personal information transmitted over the Internet. You choose to transmit information over the Internet at your own risk.

If you believe that your personal information has been compromised or if you have any concerns in this regard, we invite you to contact our person in charge of the protection of personal information using the contact details provided in section 9.

TO WHOM WE MAY DISCLOSE YOUR PERSONAL INFORMATION?

Within our company, access to your personal information is limited to those employees who need to have access to it to carry out their duties. These employees are made aware of the need to protect personal information, and policies are in place to ensure its protection.

However, to offer you quality products and services, we must communicate some of your personal information outside our company. Rest assured that we require the third parties to whom we disclose your personal information to comply with the standards laid down by law and with the security measures required to protect your personal information. We never sell your personal information, and we only disclose it in the cases provided for by law or when we have obtained your consent.

To some of our service providers and partners

To achieve some of the purposes described in the Policy, we do business with service providers to whom we may communicate or give access to your personal information where this is necessary for the performance of their service contract.

However, rest assured that we have written contracts in place with these service providers to:

- guarantee the confidentiality of your personal information;
- ensure that the information is only used to provide the service;
- ensure that the service provider does not retain any personal information when it is no longer required for the performance of the service, except for information contained in backup systems which will be deleted following the deletion cycle predetermined by the service provider;
- ensure that the service provider communicates with us immediately in the event of a confidentiality incident or any attempt to do so.

The categories of service providers with whom we do business include:

- IT and technical services

- Communications and marketing firms
- Accounting firms
- Human resources firms
- Occupational health and safety consultants
- Law firms
- Printing services
- Security and surveillance camera services
- Mail delivery services
- Application developers
- Cloud hosting services

To our various legal entities in the same group

We may share some of your personal information with other legal entities within our group where this is necessary to comply with our legal and regulatory obligations and to provide you with our products and services.

To courts, law enforcement authorities, regulators, public officials, or prosecutors

More specifically, we may disclose your personal information to comply with a search warrant, to respond to an investigative body, to comply with a court order, if we believe that disclosure is necessary to comply with applicable laws, or if required by law, while pursuing a legal claim or asserting a defense.

To other third parties

We may need to disclose your personal information to other third parties in certain specific circumstances, always to the extent permitted by law or with your consent, for example:

- as part of a commercial transaction (a merger, an acquisition by another company, obtaining a loan or financing, for example);
- in the event of insolvency or bankruptcy.

MAY YOUR PERSONAL INFORMATION BE DISCLOSED OR KEPT OUTSIDE QUEBEC OR CANADA?

Yes. The subcontractors with whom we do business and other third parties to whom we disclose your personal information may operate outside Quebec and Canada.

In all cases where we disclose your personal information outside Quebec or Canada, we ensure that your personal information is handled securely and following this Policy, and that a written agreement exists with the third party regarding the handling of your personal information. In addition, before disclosing your personal information outside Quebec, we always conduct a privacy impact assessment to evaluate, among other things, the risks inherent in the disclosure as well as the applicable legal regime of the state where your information would be disclosed.

We do not disclose your personal information unless we are satisfied that it will be adequately protected. We also ensure that third parties to whom we communicate your personal information commit to:

- restrict access to personal information only to those employees who need to have access to it to perform their duties;
- destroy personal information once the purpose for which it was collected has been fulfilled, except that personal information contained in backup systems will be deleted according to the deletion cycle predetermined by the third party;
- notify us immediately of any breach of confidentiality;
- not use personal information for purposes other than those expressly stated.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

The personal information we collect is kept only for as long as it is necessary to fulfill the purposes set out in section 2 of the Policy and to comply with our legal and regulatory obligations. We have internal policies in place to ensure that your personal information is securely destroyed or anonymized. If the information has been anonymized, it is no longer possible to identify you directly or indirectly as this is an irreversible process. If you have any questions about the retention of your personal information, please contact our person in charge of the protection of personal information using the contact details provided in section 9.

WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION?

Accessing your personal information

Subject to the exceptions provided by law, you have the right to request a copy of, or access to, the personal information we hold about you. You may exercise your right of access by contacting our person in charge of the protection of personal information at the contact details provided in section 9. Please also note that:

- Access to your personal information is free of charge. In certain circumstances, if the request is excessive or unfounded, we may charge a fee for the transcription, reproduction, or transmission of your personal information, or if you wish to obtain additional copies. We will inform you of any such charges before we comply with your request.
- We generally respond to all requests for access within 30 days of receiving any necessary information. Where we are unable to grant access, or where additional time is required to comply with a request, we will inform you in writing.

Rectifying your personal information

If you consider that your personal information is inaccurate or incomplete, you may rectify it by contacting our person in charge of the protection of personal information using the contact details provided in section 9. It is your responsibility to inform us of any changes to your personal information so that we can keep it up to date.

Obtaining information on how your personal information is managed

You have the right to request additional information relating to the managing of your personal data. If you do not find the answer to your questions in the Policy, you can contact our person in charge of the protection of personal information using the contact details provided in article 9.

Withdrawing your consent

When you give your consent for secondary purposes, i.e. purposes that are not essential to offering you our products and services, you may withdraw it at any time without consequence.

However, if you refuse to provide us with personal information that is necessary for us to offer you our products and services or that is required by law, we may no longer be able to provide you with some of our services. In this case, we may have to cancel our commitment to you. You will, however, be informed of the occurrence of such a situation.

Dissatisfaction regarding the management of your personal information

If you have any questions, concerns, or dissatisfaction regarding this Policy or the management of your personal information, you may contact our person in charge of the protection of personal information using the contact details provided in section 9.

HOW TO CONTACT THE PERSON IN CHARGE OF THE PROTECTION OF PERSONAL INFORMATION ?

The protection of your personal information is important to us. We have appointed a person in charge of the protection of personal information who is responsible for ensuring that the applicable legislation on the protection of personal information is complied with and implemented. You can reach him or her using the following contact details:

Person in charge of the protection of personal information
105, Abraham-Martin Streer, suite 500, Québec (Qc) G1K 8N1

Phone: 418-694-1414

Email : confidentialité@techsolmarine.com

POLICY UPDATE

This Policy takes effect on the date mentioned at the top of the page and replaces all previous versions. The history of previous versions of the Policy may be obtained on request from our person in charge of the protection of personal information.

The Policy may be updated at our sole discretion to reflect changes in our practices and legislation relating to the protection of personal information. When the Policy is updated, the changes will be specifically brought to your attention and a notice will be available on the home page of our website. When the changes are significant or require your consent, we will notify you by email if we have your email address.



François Lessard
Président et Chef de la direction



Date



Pierre-Marc Fiset
Directeur des services administratifs



Date