Privacy Policy

Last updated: 24/10/2025

Effective date: 22/09/2023

At Ozogram, we truly care about your personal information. This policy explains, simply and transparently, how we collect, use and protect the information you share with us, whether you visit our website, use our services or work for us. It reflects our commitment to being clear and complying with personal information protection laws.

When we refer to Law 25 in this policy, we mean the Act respecting the protection of personal information in the private sector, as well as the Act to modernize legislative provisions as regards the protection of personal information and its regulations.

Collection of Personal Information

Who is concerned?

We collect information from various individuals, including:

- Users of our website;
- Our clients;
- Our employees;
- Prospective job applicants.

Individuals under 14 years of age

We do not knowingly collect or use personal information about individuals under 14 years of age.

If you are under 14 years of age, please do not provide us with your personal information without the consent of a parent or guardian.

If you are a parent or guardian and discover that your child has provided us with personal information without your consent, please contact us so that we can take appropriate measures.

How do we collect information?

We collect personal information in various ways, including:

- Through paper or online forms, including requests for quotes or job applications;
- During telephone interviews;

- Automatically when you access our website (the device you use may provide us with certain information);
- Through cookies on our website;
- By email, including messages sent to our customer service team;
- Or directly, during verbal exchanges with you.

We also work with third parties to collect and retain your personal information, for example:

- Technology service providers that manage our platform;
- Third parties that collect personal information on our behalf and are identified below in the section *Who has access to your personal information?*.

What types of information do we collect, and why?

Depending on their roles and specific needs, different members of our team may collect certain categories of personal information. Below is an overview of the types of data we collect, with concrete examples and the individuals responsible for collecting it.

TYPES OF INFORMATION	EXAMPLES	SOURCE
Recordings	Identification photos and photos of corporate events, video surveillance recordings, etc.	Employees, job applicants, clients and any other individuals visiting our premises
Employment information	Previous work experience, professional references, past performance evaluations, etc.	Employees, job applicants
Profile information	Consumption or browsing habits, services we have provided or are providing to you, etc.	Employees, job applicants, clients
Identity information	Last name, first name, address, date of birth, telephone number, email address, etc.	Clients, employees, job applicants
Family/social information	Marital status, retirement status, information related to parenthood, etc.	Employees, job applicants
Financial information	Salary, expense reports, tax information, credit history, etc.	Employees
Medical information	Medical expert reports, examination results, etc.	Employees
Education information	Résumés, diplomas, qualification cards, certifications, etc.	Employees, job applicants
Technology information	IP address, pages viewed, time and date of visits, number of connections, etc.	Website users

Personal information is collected for the following purposes:

Conducting business activities:

- Improving the products/services offered;

- Promotional communications;
- Creating or amending a contract;
- Detecting and preventing fraud, errors, spam, abuse, security incidents and other harmful activities;
- Developing, improving and offering new services;
- Conducting research, analyses and statistics related to our business and services;
- Operating, monitoring, developing, improving and offering features on our website;
- Fulfilling our contractual obligations;
- Presenting a service proposal;
- Answering questions and assisting the individuals concerned as needed;
- Processing an order;
- Financial transactions;
- Handling and resolving complaints and concerns;
- Any other exchanges with the individuals concerned, or purposes required or permitted by applicable laws.

Legal and regulatory requirements:

- Compliance with a law;
- Requirements of a professional order;
- Certification requirements.

Internal human resources management:

- Enrolment in group insurance;
- Performance evaluations;
- Payroll management;
- Recruitment processes;
- Any other HR management needs.

Who has access to your personal information?

We ensure that your personal information is well protected. Only members of our team or our representatives who genuinely need this information to perform their duties may access it. This may include, for example:

• Our management team;
• Our person in charge of the protection of personal information;
• Our information technology services;

• Our marketing and advertising team;
• Our billing and accounting services;
• Our human resources team, particularly in connection with a job application.

Disclosure to third parties

We may share certain personal information with third parties, but only in specific situations:

- With our service providers and government bodies, to complete orders, process applications for enrolment in insurance programs, meet legal and regulatory obligations, help us operate our website, or support our services and activities;
- To protect our rights, the privacy of our employees, officers and directors, our security and property, as well as your privacy and rights or those of third parties, and to allow us to pursue available remedies or limit potential damages;
- Certain information may be transferred outside Québec if necessary. In such cases, we conduct a privacy impact assessment;
- Certain business transactions may require us to share personal information. This may occur, for example, in the event of a sale, transfer, merger, reorganization or any other change in control of the business or its assets. We always do so in accordance with the Act respecting the protection of personal information in the private sector and Law 25.

Our service providers

Although we make every effort to protect your personal information, we may use service providers to help us deliver our services. This includes, for example, IT management and security, marketing, and data analysis, hosting and storage.

Here are some situations in which such sharing may occur:

- We use Amazon (AWS) services to host our cloud-based SCADA platform. (For more information, please consult the AWS privacy policy.) Some of the categories of personal information identified in the section *What types of information do we collect, and why?* may be disclosed or stored through this service.
- We use Microsoft services (including Exchange and SharePoint Online) to store our documents and emails. (For more information, please consult the Microsoft privacy policy.) All categories of personal information identified in the section *What types of information do we collect, and why?* may be disclosed or stored through this service.
- We use GoDaddy services to host our website. (For more information, please consult the GoDaddy privacy policy.) Some categories of personal information identified in the section *What types of information do we collect, and why?* may be disclosed or stored through this service.

Security Measures

At Ozogram, we apply good cybersecurity practices to protect our IT assets, including your personal information. We have implemented administrative and technological measures to ensure the

confidentiality and security of the information we hold and to protect it against loss, theft, unauthorized access or disclosure, as well as unauthorized use, reproduction, alteration or communication.

Please note that we have not described all the security measures we apply here, in order to protect the confidentiality and effectiveness of our practices.

These measures include:

Administrative measures

On the administrative side, we have implemented several policies and procedures as part of our information governance program to:

- Govern access to, disclosure and retention of, and the destruction or anonymization of personal information;
- Define the roles and responsibilities of our employees throughout the life cycle of personal information and documents;
- Establish intervention and response procedures for incidents affecting confidentiality;
- Govern the handling of requests and complaints regarding the protection and processing of personal information;
- Designate a person in charge of the protection of personal information.

These measures help protect privacy and personal information within Ozogram. We have also made our privacy policy available on our website and informed our staff of its existence, as well as that of our personal information governance and management policy, which is available upon request. We also remind everyone of their role in protecting the personal information of our clients and team members.

Technological measures

On the technical side, we use several methods to protect your personal information:

- Secure servers and Transport Layer Security (TLS) technology;
- Limiting access privileges to personal information on a need-to-know basis;
- A firewall system to protect our infrastructure;
- Data encryption, strict access controls (including multi-factor authentication) and regular internal audits.

We cannot guarantee a complete absence of risk

Although we make every effort to protect your personal information, we cannot guarantee absolute security. If you believe that your information is no longer secure, please contact our person in charge of the protection of personal information immediately.

Ozogram Inc.

How do we use cookies?

Cookies are small text files that we store on your device or in your browser. Some cookies are deleted at the end of your browsing session, while others remain on your device or in your browser to recognize your browser on your next visit.

We use only first-party cookies that are strictly necessary for the proper functioning or performance of our website. These files do not damage your device and cannot be used to access your personal information.

Links to Third-Party Websites

Our website may contain references or links to third-party websites, products or services. These services are neither operated nor controlled by Ozogram and are governed by their own privacy policies, which are separate from ours. We therefore cannot be held responsible for the content or activities of these external websites. This policy applies only to our website, our employees and the services we offer.

Retention Limits

We retain your personal information only for as long as necessary to achieve the purposes for which it was collected, except where provided for or required by Law 25. All records containing personal information are destroyed once they are no longer reasonably necessary for legal, regulatory or administrative purposes. In some cases, destruction may be subject to legal obligations or technological constraints.

What Are the Rights of the Individuals Concerned?

Transparency

At Ozogram, we are committed to full transparency. Upon a legitimate request, we may provide you with our privacy policy as well as our governance practices regarding personal information. **Any question or request may be sent by email to our person in charge of the protection of personal information.**

Access and portability

Individuals concerned have the right to consult the personal information about them held by Ozogram and to obtain a copy, if necessary.

The exercise of this right is subject to certain legal restrictions. We will take reasonable steps to verify the appropriateness of the request and the identity of the requester before providing access to the information.

You may also request additional information about how we use, disclose, retain and destroy your personal information. Upon written request to our person in charge, your personal information may be provided to you or, if you wish, transferred to another organization in a structured, commonly used technological format. In most cases, you will receive a response within 30 days.

Consent

At Ozogram, we collect, use and share your personal information only with your consent or within the limits permitted or required by law. If we need to use or disclose your information for a new purpose not

originally contemplated, we will ask for your consent beforehand, unless Law 25 permits or requires us to do so.

Unless otherwise provided by law or contractual obligations, you may choose to refuse or withdraw your consent to the collection, use or disclosure of certain personal information. For example, you may choose not to complete optional fields on our paper or electronic forms.

Please note that refusing consent may limit access to certain features of our website or restrict the provision of certain services.

De-indexing

You have the right to ask us to stop disseminating your personal information and to de-index any link associated with your name that provides access to it, if such dissemination contravenes the law or is subject to a court order.

Accuracy

At Ozogram, we ensure that the personal information we collect is relevant and up to date for the intended purposes. We make every reasonable effort to maintain its accuracy and update it regularly. If you become aware that we hold inaccurate personal information about you, you have the right to ask us to correct it.

Notification in the event of an incident

You have the right to be informed if a confidentiality incident involving your personal information has occurred and could cause you serious injury. To this end, we maintain a register of all incidents and carefully assess the risks and potential harm they could entail.

Complaints

We have established a procedure for receiving and handling complaints regarding this policy or our personal information management practices. If you believe that this policy has not been followed, you may submit your complaint to our person in charge of the protection of personal information. In most cases, we will provide you with a response within 30 days.

If you are not satisfied with our response or our practices, you may also file a complaint with the *Commission d'accès à l'information du Québec* at the following email address: renseignements@cai.gouv.qc.ca.

Need to verify your identity

To process your request, we may ask you to provide an appropriate identification document or to confirm your identity by another means.

Governance Policies and Practices for the Protection of Personal Information

Ozogram has developed a personal information governance and management policy, which is available upon legitimate request. It includes, among other things:

- The rules applicable to the retention and destruction of personal information;

- The roles and responsibilities of staff members throughout the life cycle of personal information;
- The process for handling complaints regarding the protection of personal information.

Through this policy, we commit to protecting the personal information of our clients, employees and partners in accordance with the Act respecting the protection of personal information in the private sector (Law 25). Its governance practices aim to ensure that information is collected, used, retained and disclosed in a transparent, secure and responsible manner.

Key principles:

- Limited collection: we collect only the information necessary for legitimate and clearly specified purposes.
- Consent and transparency: consent is obtained when required, and we provide clear information about how personal data is used.
- Data protection: personal information is protected by appropriate administrative, technological and physical measures.
- Restricted access: only employees or partners with a legitimate need may access the information.
- Retention and destruction: data is retained only for as long as necessary and securely destroyed at the end of its life cycle.
- Individual rights: everyone may access their personal information, have it corrected, limit its use, and request the cessation of its dissemination or its portability.

Roles and responsibilities:

- The person in charge of the protection of personal information oversees compliance with Law 25, handles access requests and complaints, and coordinates the response to confidentiality incidents.
- Management, managers and employees are responsible for complying with the policy and applying good practices when handling personal information.
- External suppliers and partners must comply with equivalent security standards and report any incident affecting Ozogram's data.

Training and awareness

All employees and partners receive initial training and regular reminders about personal information protection and Law 25.

Incident and complaint management

Every incident or complaint is handled in a structured manner, documented and communicated to the individuals concerned, with the possibility of recourse to the Commission d'accès à l'information du Québec.

Updates to the Policy

We review this policy whenever there is a significant change in legislation, regulatory requirements or our business.

We also reserve the right to amend this policy at any time in accordance with applicable law. If changes are made, the revised version will be published on our website and the update date will be revised in the footer.

Contact Us

Our person in charge of the protection of personal information ensures that your data is processed in accordance with Law 25 and this policy. If you have questions, comments or requests, please feel free to contact him using the following contact information:

Person in Charge of the Protection of Personal Information

Guillaume Caron
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