

## Policies and Practices concerning the personal information governance

Groupe Sonxplus Inc. is committed to protecting all personal information collected and used in the management of its activities. The person responsible for personal information is the president of Groupe Sonxplus.

### **PURPOSES OF INFORMATION COLLECTION**

Our privacy policy describes the standards for the collection, use, disclosure, and retention of your personal information. It also explains how we protect your personal information and your right of access to it.

### **PERSONAL INFORMATION**

Personal information is defined as any information or combination of information that relates to a natural person and allows that person to be identified. However, an individual's name, business title, business address, business telephone number and business e-mail address are not personal information. Personal information must be protected regardless of the nature of its medium or form; written, graphics, audio, visual, computerized, or others.

### **CONSENT**

When we obtain information about you, we first ask for your written consent to collect, use, or disclose your collected information for the identified purposes. We will seek your consent for any other use, disclosure, or collection of your personal information or when the purposes for which your information was collected, change. Our company undertakes to use the information provided only for the purposes for which it was collected and to retain it for as long as necessary to provide the service requested. However, we may, collect, use, or disclose personal information without your consent when permitted or required by the law. In certain limited circumstances, we may collect, use, or disclose personal information without your knowledge or consent. Such circumstances arise when, for legal, medical or security reasons, it is impossible or unlikely to obtain your consent, or when the information is required to investigate a possible breach of contract, to prevent or detect fraud, or to enforce the law.

### **LIMITS OF COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION**

The purpose for which information is collected is generally to confirm an individual's identity, create a customer file, comply with legal requirements, analyze browsing choices and statistics on the use of online services. We limit the collection, use and disclosure of your personal information to the purposes we have identified to you. Your personal information may only be accessed by certain authorized people, and only for the purposes for which they have been designated.

## **RETENTION OF INFORMATION**

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected. We must destroy this information in accordance with the law and our records retention policy. When we destroy your personal information, we take the necessary measures to ensure its confidentiality and to ensure that no unauthorized person has access to it during the destruction process.

## **ACCURACY**

Personal information must be as accurate, complete, and up to date as required for the purposes for which it is intended. Personal information that is used on an ongoing basis, including personal information that may be disclosed to third parties, will generally be accurate and up to date unless limits on the accuracy of that information are clearly established. We do not routinely update personal information unless necessary to fulfill the purposes for which it was collected. The degree of accuracy and updating as well as the completeness of the personal information will depend on your data entries during the collection consent form.

## **RESPONSIBILITY**

We are responsible for personal information in our possession or custody. Our Privacy Officer oversees this Privacy Policy and related processes as well as the procedures to be followed to protect this information. Our staff is informed and adequately trained on our policies and practices regarding the protection of personal information.

## **SECURITY MEASURES**

We have implemented and continue to develop stringent security measures to ensure that your personal information remains strictly confidential and is protected against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. These security measures include organizational measures such as restricting access to what is necessary; backup; and technological measures such as the use of passwords and encryption (for example, frequent password changes and the use of firewalls).

## **ACCESS TO PERSONAL INFORMATION**

Only authorized personnel has access to your personal information. The company ensures those people are qualified to access this information and that access is necessary for the performance of their duties.

## **A REQUEST FOR ACCESS TO INFORMATION AND MODIFICATIONS**

You have the right to know whether we hold personal information about you and to view that personal information. You also have the right to ask questions about how this information was collected and used and to whom it was disclosed. We will provide you with such information within a reasonable time from the date of receipt of the written request. You can check the accuracy and completeness of your personal information and, if necessary, request modification. Any request for modification will be processed within a reasonable time. Any request for access to personal information or modification of personal information may be sent to the address below: [confidentialite@sonxplus.com](mailto:confidentialite@sonxplus.com)