

Policy Regarding Personal Information Protection Optical Vision Group

Last updated on September 18, 2023

Optical Vision Group Inc. and its subsidiaries ("company") are subject to the *Act Respecting the Protection of Personal Information in the Private Sector*. For this reason, we provide all our customers, suppliers, partners, and employees with the following policy. We are committed to upholding the highest standards of personal information protection.

Responsibilities and Oversight

The CEO of the company delegates the role of Personal Information Protection Officer, commonly referred to as "PIPO," as required by law, to the Human Resources Coordinator.

A committee was established as of September 2023 to review all collected data, its use, disclosure, retention, and, if necessary, its destruction. To do so, the PIPO will convene various key stakeholders in sectors requiring personal information protection, including human resources, information technology, and marketing. The committee will meet quarterly, with additional ad-hoc meetings scheduled as needed.

Collection of Personal Information

We commit to collecting only the personal information necessary for the execution of our activities. We will inform our customers, suppliers, partners, and employees of the purposes for which we collect this personal information. Depending on the user, consent may be obtained verbally, in writing, via email, through the use of "cookies," or tacitly in certain cases. However, we will automatically seek consent to use or disclose this information to third parties, as applicable.

Disclosure of Personal Information

We will only disclose personal information to third parties when it is necessary to do so, such as when required by law, for any legal proceedings, or to assert and protect our legal rights.

Security of Personal Information

We take all reasonable measures to protect personal information. These measures include, but are not limited to, the use of encrypted databases, firewalls, and antivirus software on our devices, as well as confidentiality agreements with suppliers, partners, and employees.

Retention and Destruction of Personal Information

Personal information is stored in systems that utilize encrypted databases and secure filing cabinets with controlled access. Access is restricted to a limited number of employees who require access to this information in the course of their duties. Personal information that is no longer needed will be destroyed according to strict procedures, which will be reviewed annually by the committee.

Incident Management

The PIPO is responsible for taking all necessary actions when a security incident related to personal information occurs. The incident log will include:

- Date and circumstances of the incident
- Date when the company became aware of the incident
- Identity of the person conducting the investigation
- Personal information affected
- Sensitivity level of the information involved
- Number of affected individuals or an estimate
- Measures taken to mitigate harm
- Date of notification to the *Commission d'accès à l'information du Québec* and affected individuals
- Reasons justifying the company's non-disclosure of the incident, if applicable

Accountability

Once a year, the PIPO will report to the company's board of directors on the committee's activities.

Access to Personal Information

All customers, suppliers, partners, and employees have the right to request access to their personal information. They may choose to delete or modify their consent for data collection and use at any time, provided it is reasonable and legally acceptable to do so.

Contact

If you wish to file a complaint, delete or modify your personal information, or if you have any questions regarding this policy or how we manage personal information, please contact our Personal Information Protection Officer contact using the provided information.

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