



# POLICY ON THE MODERNIZATION OF LEGISLATIVE PROVISIONS ON PERSONAL INFORMATION PROTECTION (LAW 25)

## Privacy law preamble

The law modernizing legislative provisions on personal information protection, also known as Law 25, aims to protect the Quebec population by holding businesses accountable for the personal information they hold. The Commission d'accès à l'information du Québec is responsible for overseeing the application of Law 25.

### 1. Definitions

In this policy, unless context requires otherwise, the following terms mean:

#### Personal information

Any information about an individual that directly or indirectly identifies them, such as: address, social insurance number, driver's license number, phone number, bank details, email address, occupation, family status.

#### Sensitive personal information

Sensitive personal information refers to specific details that, when processed or disclosed, may pose an increased risk to privacy or security, including health or medical information, ethnic or racial origin, religious or philosophical beliefs, sexual orientation, political opinions, union affiliations, genetic or biometric data, and any other information considered sensitive under applicable data protection laws or standards. The sensitive nature of this information often requires additional measures for confidentiality and integrity.

#### Privacy incident

Unauthorized access, use, or disclosure of personal information contrary to law, as well as its loss or any other form of breach of its protection.

### 2. Scope of this policy

Kildair Service is committed to protecting privacy rights and acknowledges the importance of safeguarding the personal information it collects through recruitment, onboarding, integration processes, and subcontractor agreements. This policy describes the practices implemented within the organization regarding the personal information made available to it.

### 3. Collection of personal information

Kildair Service collects personal information related to the employment of its employees. This data is collected from the individual during the recruitment, onboarding, and integration processes. Additionally, certain information may be collected throughout employment as necessary. Kildair Service obtains consent from employees for the collection of their personal information and commits to transparency regarding its use. We take measures to ensure that the personal information obtained is adequate, relevant, not excessive, and used for specific and limited purposes. We also limit the collection of personal information to what is necessary to achieve these purposes.



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## 3.1 Third parties and service providers handling your personal information

In the course of our activities, we may disclose personal information to various third parties and service providers. These entities may include, but are not limited to:

- **IT and security service providers:** For the management and protection of our IT systems and data.
- **Payroll and accounting service providers:** For processing salaries and benefits.
- **Background verification agencies:** To conduct necessary checks before employment or as part of our policies.
- **Government agencies:** When required by law to provide certain information, particularly in tax compliance.
  - **Canada Revenue Agency:** For tax compliance and obligations.
  - **Revenu Québec:** For provincial tax obligations.
  - **Ministry of Labour:** For matters related to compliance with labor standards and occupational health.
  - **Commission des normes, de l'équité, de la santé et de la sécurité du travail (CNESST):** For claims related to workplace accidents and health and safety at work.
- **Regulatory authorities:** For audits or investigations required by law.
- **Legal advisors and other professionals :** For obtaining legal advice or services related to our activities.
- **Insurers and insurance brokers:** For the management of insurance policies and claims.
- **Banks and financial institutions:** For banking operations and financial transactions related to our activities.
- **Healthcare professionals:** For ensuring medical follow-up and health of our employees and participants.

We ensure that these third parties and providers adhere to strict standards of confidentiality and security to protect personal information.

## 3.2 Security measures used by third parties or service providers and affiliated companies for the protection of your information

Service providers and affiliated companies are required to implement appropriate security measures to protect personal information. When service providers or affiliated companies process personal information on our behalf as "data processors," they do so only according to our instructions and to the extent that they have committed to processing it confidentially and ensuring its protection.

## 4. Retention and destruction of personal information

Kildair Service has implemented a procedure for the retention, destruction, and anonymization of personal information aimed at regulating the retention period for each piece of information collected, and more specifically, the timeframes established for the destruction or anonymization of this information. This procedure is designed to ensure the security and confidentiality of the information collected and stored in our records.

Kildair Service retains the personal information it holds only for as long as necessary to fulfill the purposes for which it was collected and in accordance with its retention schedule as outlined in the S-108 system procedure, unless permitted or required by applicable laws or regulations.

Employee digital records are the primary source in which employees' personal information is recorded. The electronic version of these records is stored in a secure folder on the network. Each document containing personal information has been reviewed to determine authorized access permissions, in accordance with the S-108 system procedure.

Unless a law requires a specific retention period, personal data will not be retained beyond the time necessary to achieve the purpose for which it was collected. Once this period has elapsed, we ensure that personal data is securely destroyed.



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## 5. Personal information protection officer

In accordance with Law 25, our organization has appointed a Personal Information Protection Officer to ensure compliance and security of your information. Marc Lemay, Director of Human Resources, will assume this role. As the Personal Information Protection Officer, Marc Lemay will be responsible for ensuring the confidentiality, integrity, and security of the personal data we collect and process.

You can contact Marc Lemay with any questions or concerns regarding the protection of personal information using the following contact information:

**Marc Lemay**

Email: [mlemay@spragueenergy.com](mailto:mlemay@spragueenergy.com)

Phone: (450) 756-8091 ext. 265

This information is also available on our website and distributed by any appropriate means for easy public access. We are committed to protecting the personal information of our employees and complying with legal obligations regarding data privacy and security.

## 6. Mandatory reporting of a privacy incident

Anyone to whom we may disclose personal information (internal and external third parties) must notify us when they have reasonable grounds to believe that a privacy incident involving personal information held by Kildair has occurred. This report must be made promptly to the Personal Information Protection Officer.

Kildair is firmly committed to maintaining a record of privacy incidents and documenting comprehensive measures taken to prevent the recurrence of similar incidents. We take the protection of personal data very seriously and continually strive to ensure its security and confidentiality.

In the event of a data breach involving personal information and presenting a risk of serious harm, our company undertakes to inform both the Commission d'Accès à l'Information (CAI) and all affected individuals.

## 7. Complaint filing

If you are not entirely satisfied with the policy or wish to provide feedback on its implementation, please write to the Personal Information Protection Officer. You may also file a complaint with the Privacy Commissioner in your province or with the Office of the Privacy Commissioner of Canada.

## 8. Amendment of this policy

We reserve the right to update or amend this policy at any time based on evolving legal or regulatory requirements or your expectations. We will publish any changes to this policy on our website. Any modification will take effect upon publication on our website. We encourage you to regularly check this page to stay informed about the latest changes to our privacy practices. Continuing to use our website after modifications constitutes your acceptance of the amended policy.