

## **PRIVACY POLICY**

*Le Groupe SG and its affiliated divisions*

**Last updated: April 2025**

### **1. PURPOSE**

This policy aims to govern the collection, use, retention, protection, and disclosure of personal information within Le Groupe SG, in accordance with Law 25 and best practices in data privacy.

### **2. DEFINITION OF PERSONAL INFORMATION**

Any information about a natural person that allows them to be identified, directly or indirectly, is considered personal. This may include, but is not limited to: name, address, personal email, phone number, banking information, image, health information, etc.

Professional contact details (title, business address, business phone, and email) are not considered personal information.

### **3. COLLECTION OF PERSONAL INFORMATION**

We collect your personal information:

- When you create an account or purchase a product or service;
- When communicating with our staff or using our online services;
- Through the use of cookies and analytics tools (e.g., Google Analytics);
- Via authorized third-party sources, such as credit agencies.

#### **Collection limitation**

We limit the collection of data to what is necessary for the following purposes:

- Customer or employee relationship management;
- Provision of goods or services;
- Compliance with our legal obligations (e.g., tax, contractual);

- Security, fraud prevention, or internal investigations.

#### **4. CONSENT**

Your consent is required before collecting, using, or sharing your personal information, except in cases provided by law (e.g., safety, emergency, fraud prevention, etc.).

You may withdraw your consent at any time, subject to certain legal or contractual restrictions.

#### **5. USE OF INFORMATION**

Your information may be used:

- To execute a contract or deliver a service;
- To communicate with you regarding your requests or transactions;
- For security, audit, or service improvement purposes;
- To send promotional communications (with your prior consent).

#### **6. DISCLOSURE TO THIRD PARTIES**

We may disclose your personal information to authorized suppliers or agents (e.g., delivery, advertising, data hosting), provided they meet our confidentiality standards.

We may also disclose your information:

- In the event of a sale, merger, or business reorganization;
- As required by legal obligations (e.g., court order).

#### **7. RETENTION AND DESTRUCTION**

Information is retained for as long as necessary for the purposes for which it was collected. It is then securely destroyed in accordance with our retention policy.

## **8. ACCURACY AND UPDATES**

We ensure that personal information remains accurate and up to date. However, it is your responsibility to notify us of any relevant changes.

## **9. SECURITY MEASURES**

Le Groupe SG applies strict security measures:

- Restricted access to information (based on roles);
- Passwords and encryption;
- Secure hosting (including external servers, if applicable);
- Ongoing staff awareness and training.

## **10. ACCESS AND MODIFICATION**

You may request:


- Access to your personal information;
- Correction if it is inaccurate, incomplete, or outdated.

## **11. ACCOUNTABILITY**

Le Groupe SG is responsible for the personal information under its control.

Ms. Mélissa Gamelin, Privacy Officer, oversees this policy:

 [melissa.gamelin@legroupesg.com](mailto:melissa.gamelin@legroupesg.com)

 418-660-8888 ext. 2225

## **12. TRAINING AND AWARENESS**

Le Groupe SG regularly informs its personnel through:

- Training sessions;
- Reminders during team meetings;
- Display of the Privacy Officer's contact information.

### **13. COMPLAINTS**

Any complaint or question can be directed to the above-mentioned Privacy Officer. An investigation will be conducted, and corrective actions will be taken if necessary.

### **14. POLICY UPDATES**

This policy is reviewed at least every three years or upon significant legislative or regulatory changes.