
Policy

Protection of personal and confidential information

1 Introduction

GMP Energy (hereinafter "GMP") is concerned about respecting your privacy and protecting your personal information.

In the course of using our services, GMP may collect and you may disclose personal information.

The purpose of this policy is to explain the following to users of the services offered by GMP:

- How their personal data is collected and processed;
- What rights they have to their data;
- Who is responsible for processing the personal data collected and processed;
- To whom these data are transmitted;
- The use of cookies by GMP on its websites.

2 Applicable laws

GMP Energy is subject to the privacy provisions of the Act respecting the protection of personal information in the private sector (RLRQ, c. P-39.1).

At the same time, a European resident's personal information will be processed in accordance with the European Union's General Data Protection Regulation (GDPR).

3 Personal information

Any information that relates to an individual and allows that person to be identified is considered personal. Your personal information may include, but is not limited to, your first and last name, date of birth, residential address, telephone numbers, gender, e-mail address, information about your family situation, information you enter when you create a profile to join one of our services, your lifestyle or your health.

However, personal information does not include information concerning a person's position within a company, such as name, title and position, as well as the address, e-mail address and telephone number of the person's place of work.

4 Our commitment

We have established and implemented internal policies and procedures to adequately protect personal information in our possession, regardless of the medium or form in which it is held. We review them on a regular basis.

We make our employees aware of the importance of protecting personal information by requiring them to undergo training on the subject and by issuing occasional directives outlining their role and obligations in this regard.

5 Information gathering objectives

In the course of our duties, we collect your personal and confidential information solely to enable us to provide you with the requested services in an appropriate and personalized manner. In all cases, the disclosure of your personal and confidential information will be subject to obligations to maintain confidentiality and comply with applicable laws.

6 Consent

Subject to the exceptions and requirements of applicable laws, we will not communicate or disclose your personal information to any third parties without your consent.

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By using our services, you consent to the collection, use and disclosure of your personal and confidential information in accordance with this policy. The form of consent may vary depending on the context or the service requested.

Your consent will also be requested:

- By a representative of our sales department for contractual purposes
- By a representative of our human resources department
- By a representative of one of the services you wish to join
- By the main service provider in cases where GMP acts as a subcontractor

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

In certain circumstances, we may collect, use or disclose personal information without your knowledge or consent. Such circumstances may arise, for example, 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.

Before disclosing personal information about another person to us, you must obtain that person's consent to the disclosure and processing of that personal information under the terms of this policy.

6.1 Personal information about a minor

Personal information will not be collected from a minor under the age of 14 without the consent of the parent or guardian.

7 Limits on collection, use and disclosure

7.1 Collection

We limit the collection, use and disclosure of your personal information to the purposes we have identified to you. Personal information is accessible to any person who is entitled to receive it within GMP when this information is necessary for the performance of his or her duties.

If you submit personal information to one of our websites for the purpose of publication, we will publish it and may use the information in accordance with the permissions you grant us.

7.2 Use

We may use the personal information we collect for the following purposes, among others:

- To provide the requested service;
- To confirm your identity and respond to your requests for information;
- To improve our service offering;
- To operate and improve the website and our solutions while understanding user usage patterns;
- To provide any other complementary service associated with the requested service;
- To meet legal and regulatory requirements;
- To control the quality of customer service and prevent errors and fraud.

7.3 Disclosure

We may disclose your personal information to any of our employees, professional advisers, suppliers, or subcontractors or affiliates to the extent reasonably necessary to provide the services requested and for the purposes set out in this policy.

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As a general rule, we do not disclose your personal information. Occasionally, we may share your personal information with certain suppliers or agents in order to provide the services you have requested. In all cases, we comply with legal restrictions and requirements when disclosing your personal information and, in certain circumstances, this is subject to a written agreement and a security assessment demonstrating that your personal information is adequately protected in a manner similar to that in place at GMP.

Your personal information will not be disclosed to third parties other than in accordance with this Privacy Policy, except as required or permitted by law, or as ordered by a court of competent jurisdiction.

We do not sell your personal information to third parties.

7.4 Impact assessment

A Privacy Impact Assessment (PIA) on the use of personal information by our services and/or systems is conducted before any personal information is collected by GMP. When transfers are made outside Quebec, the impact on such a transfer will also be carried out.

7.5 International data transfers

The information we collect may be stored, processed and transferred in any country in which GMP or its subcontractors offer their services, in order to enable us to use the information in accordance with this policy.

The information we collect may be transferred to or processed in the following countries: the United States of America and certain countries of the European Union.

Personal information that you publish on our website or submit for publication may be available via the Internet worldwide. We cannot prevent the use, good or bad, of this information by third parties.

You expressly consent to the transfer of personal information as described in this section.

8 Non-personal information

We automatically collect certain non-personal information using third-party analytics programs such as Google Analytics to help us understand how our visitors use our web services, but none of this information identifies you personally. The following information may be collected, stored and used:

1. Information about your computer, including your IP address, geographic location, browser type and version, and operating system;
2. Information about your visits to and use of our web sites, including referral source, length of visit, pages viewed, and web site navigation paths;
3. Information generated when you use our site, including when, how often and under what circumstances you use it;

9 Cookies

GMP and affiliated web services use cookies. Cookies are small data files stored on your computer or mobile device when you visit a website or application. They are used to enhance your user experience by recording certain data. By using GMP Web services, you consent to this use.

9.1 Cookies we use on our websites

We use cookies for the following purposes:

- a) **Authentication:** We may use cookies to identify you when you visit and browse our site and web platforms. Cookies collected for this purpose are used for login and session management.
- b) **Personalization:** We use cookies to store information about your preferences and enable us to personalize the service to your needs. The cookies used for this purpose are used to capture the language of use of GMP websites.

9.2 COOKIES USED BY OUR SERVICE PROVIDERS

In certain situations, it is possible that one of our services is provided by one of our external suppliers who may use cookies that will be stored on your computer or mobile device.

9.3 COOKIE MANAGEMENT

You can set your browser or device to refuse cookies or delete them after they have been stored. Please consult the "Help" section of your browser or device for instructions. Please note that deleting or refusing cookies may affect your user experience.

10 Retention of information

When your personal information is no longer required, it is destroyed in accordance with the law and our records retention policy. In certain circumstances, we may anonymize the personal information we retain.

Your personal and confidential information is kept, directly or through subcontractors, only for as long as is necessary for the purposes of the services requested and applicable legal and regulatory requirements. We require our subcontractors to subscribe to confidentiality commitments and to apply policies equivalent to this one. In all cases, access to your personal and confidential information is restricted to those persons for whom access is required in the performance of their duties.

11 Liability

We are responsible for personal information in our possession or custody, including information we entrust to third parties for the purpose of providing you with the requested service. We require these third parties to maintain this information under strict confidentiality and security standards.

We adhere to the principles set out by law. We have policies and guidelines in place to ensure that your privacy is protected. The Privacy Officer oversees this Privacy Policy as well as the company's various frameworks.

Our staff is informed and properly trained on privacy policies and practices.

12 Safety measures

We have implemented a number of security measures with respect to the personal information and confidential data we hold in order to protect such information against loss or theft and to prevent unauthorized access, transmission, use or modification of such personal information, including the following subsections:

12.1 Privacy Impact Assessment

GMP conducts a Privacy Impact Assessment (PIA) of any project involving the acquisition, development or redesign of an information system or the electronic delivery of services that involves the collection, use, disclosure, retention or destruction of personal information. This assessment documents the serious and legitimate interest in the use of personal information.

12.2 Secure computing environments

Infrastructure and equipment are hosted in a secure environment in a data center located in Quebec or Canada. In cases where a service is not hosted in Quebec, we ensure that security measures equivalent or superior to those required by this Policy are put in place.

Access to GMP's Web services is via a secure transmission channel using an SSL certificate (HTTPS).

12.3 Access management

Only employees whose duties require it have access to personal or confidential information. Data access is logged and monitored.

12.4 Training and awareness-raising

Our employees and partners are trained and made aware of the importance of protecting your personal information.

12.5 Commitment to confidentiality

Our employees sign a confidentiality agreement.

Security audits are carried out by firms specializing in information security.

12.6 Destruction

GMP ensures the physical and technological security of the personal information it holds in order to prevent accidental destruction, loss, disclosure or inappropriate destruction.

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

12.7 Managing incidents involving personal information

If GMP has reason to believe that a confidentiality incident involving personal information has occurred and that there is a risk that serious harm will be caused by the incident, GMP will promptly inform the *Commission d'accès à l'information* and any person whose personal information is affected by the incident. It may also notify any person or organization likely to reduce this risk, by communicating only the personal information necessary for this purpose without the consent of the person concerned. In all cases, a log will document the incident for reference purposes.

13 User rights

13.1 Request for access, withdrawal or correction

Subject to any regulatory or contractual restrictions, you may consult, correct or destroy the personal information we hold about you.

We will send you such information within a maximum of 30 days from the date of receipt of the written request and in a structured, commonly used technological format. A fee may be charged for processing your request.

Under certain circumstances, we may refuse to provide you with the requested information. Exceptions to your right of access include the fact that information cannot be disclosed for legal or security reasons. These limitations are described in the Act respecting the protection of personal information in the private sector (RLRQ, c. P-39.1).

You may verify the accuracy and completeness of your personal information and, if necessary, request that it be amended. Any request for amendment will be processed in accordance with the law.

13.2 Data portability

The user has the right to request the portability of personal data held by GMP to another site.

13.3 Limiting and objecting to data processing

The user has the right to request the limitation of or to object to the processing of his/her data by GMP and GMP cannot refuse this request unless it can be shown that there are legitimate and overriding reasons, which may override the interests and rights and freedoms of the user.

13.4 Decision based exclusively on an automated process

The user has the right not to be subject to a decision based exclusively on an automated process if the decision produces legal effects concerning him or her, or significantly affects him or her in a similar way.

14 Inquiries, complaints and questions

We are committed to responding to your questions and concerns regarding the protection of your personal information. If you are not satisfied with the response, you may contact the Privacy Officer.

14.1 Contact

Any request or complaint concerning the protection of personal information should be sent to the Privacy Officer at the address below:

Privacy Officer
GMP Energy
1350 Nobel Bureau 100
Boucherville, QC J4B 5H3
Email: renseignementspersonnels@gmpenergie.com

In the event that the Privacy officer decides not to respond to a user's request, and the user wishes to contest this decision, or if he believes that one of his rights has been infringed, he is entitled to contact the [Commission d'accès à l'information du Québec](#).

15 REVISION AND APPROVAL

This Policy is effective upon adoption by GMP's Executive Committee and may be revised at any time by the Privacy Officer.

Changes may be proposed by various GMP stakeholders, which must be submitted in writing to the Privacy Officer.

GMP reserves the right to modify this policy at any time. Any changes will be posted on GMP's various web platforms. Your use of the Services following the posting of changes to the Policy constitutes acceptance of those changes.

This Policy should be reviewed at least every two years to ensure its relevance to GMP's mission, the activities of its users and any substantial changes in legislation or regulatory requirements.

16 EFFECTIVE DATE

This Policy takes effect on September 1st 2023. It cancels and replaces all previous guidelines on this subject.