

# Privacy Policy

Corporate Policy



This Privacy Policy summarizes SANEXEN's practices regarding Personal Information collected and describes the measures SANEXEN takes with respect to the collection, use, disclosure, protection and processing of Personal Information in accordance with its obligations under the Privacy Laws.

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# Getting your consent

- a. The collection by SANEXEN of an individual's Personal Information, such as individual's name, personal address, e-mail, CV and any other information the individual can provide to SANEXEN when contacting SANEXEN by email or by phone, for a specific purpose is subject to, as the case may be, its prior implied or express consent. The consent must be expressed in case of use of sensitive information or for purposes that would exceed your reasonable expectations. Sometimes, we may infer your consent from your behaviour. For example, if you choose to provide us with your personal information after having read this Policy, we will assume that you agree that we can use and disclose it in the manner described in this Policy. In that case, consent will be implied.
- b. SANEXEN asks for an individual's additional consent each time it wishes to use the Personal Information collected for a new purpose.
- c. An individual who has given their consent to the collection of Personal Information can withdraw such consent at any time.
- d. Unless the individual consents otherwise and subject to the exceptions provided by the Privacy Laws, SANEXEN only uses and discloses Personal Information for the purposes for which it was collected and consented to, or for a use consistent with that purpose.
- e. The use and disclosure by SANEXEN of an individual's Personal Information for a purpose that is different from the one originally consented to are subject to such individual's prior consent. Consent must be expressed, in particular in the case of the use of sensitive information.

# Purposes of Collection, Use and Disclosure of Personal Information

- a. SANEXEN only collects Personal Information from individuals as required to carry out its activities, recruit employees and to meet its legal obligations. For example: in the hiring process, payroll management, performance management processes, succession planning, tax returns, contact during parental, maternity, or disability leave, or for the use of data for government reports.

- b. SANEXEN can also collect usage information, such as IP address, Information about your browser, visit duration, and viewed pages, to follow a user's browsing through the various sections of a website.
- c. Personal Information may be collected through an individual's disclosure or through a third party. To the extent reasonably possible, Personal Information is directly collected from the individual to whom the information relates unless such individual authorizes SANEXEN to collect the Personal Information from a third party.

## Retention and Disposal of Personal Information

Subject to applicable laws relating to retention obligations and SANEXEN's internal policies, Personal Information that has been collected by SANEXEN is destroyed, erased or made anonymous once it is no longer required for the purpose it was collected, or earlier if so requested by the individual to whom the information relates.

## Accuracy of Personal Information

Once collected, SANEXEN maintains the Personal Information relating to an individual as accurate, up-to-date and complete as reasonably possible.

## Use and Disclosure of Personal Information

- a. SANEXEN may further disclose Personal Information collected to Third Party Service Providers consistent with the same purpose for which it was collected.

# Security and Protection of Personal Information

- a. SANEXEN protects the Personal Information of individuals that is in its custody or control using reasonable physical, administrative, and technical security safeguards to protect the Personal Information against loss or theft, as well as unauthorized access, use, and disclosure.

Physical security measures include:

- Building's security cameras
- Office access cards
- Locking filing cabinets

Administrative security measures include:

- Limiting access to the Personal Information to the employees and consultants who need to know it to perform their duties
- Compliance by SANEXEN employees with the Code of Ethics and Business Conduct and signing of the annual acknowledgment form, with strict rules governing the protection of Personal Information
- Making available to employees the Compliance Capsule Training relating to privacy
- Implementing policies and procedures for monitoring, investigating and updating security systems and measures
- Performing ongoing monitoring and controls to detect suspicious activity and potential deviations from corporate directives and policies

Technical security measures will include:

- Password
- Data encryption
- Access management system
- Performing monitoring and controls to detect suspicious activity

- b. Collected Personal Information is typically stored in Canada; however, SANEXEN may use Third-Party Service Providers located outside the country, specifically in the United States. While such information is outside of your country of residence, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. Before we disclose your Personal Information, we take appropriate measures to protect it. We also sign a contract that includes appropriate security measures for the Information communicated.
- c. Access to an individual's Personal Information is limited to SANEXEN employees and consultants, Third Party Service Providers and government authorities, who need access for the specific purpose of the Personal Information collected. By annually adhering to the Code of Ethics and Business Conduct, SANEXEN employees commit to protecting the confidentiality of the Personal Information they need to perform their duties. Third Party Service Providers must contractually agree to comply with and abide by strict standards for the protection and confidentiality of Personal Information, in accordance with this Privacy Policy and in accordance with applicable Privacy laws.
- d. Subject to Privacy Laws, SANEXEN may exceptionally be involved in the sale, merger or restructuring of some of its business or assets. During such transactions, SANEXEN may disclose Personal Information of individuals to the purchaser or the new corporate entity.
- e. To the extent that SANEXEN is informed of a breach of security measures that constitutes a real risk of significant harm or a risk of serious injury to a person, SANEXEN shall notify the latter and transmit the information required by Privacy Laws to the relevant data protection authority.

# Right to Access, Correction and Withdrawal of Consent

Upon an individual's written request, SANEXEN shall give access to such individual to all the Personal Information it holds about that individual. Any such request shall be made in writing to SANEXEN's Privacy Officer. SANEXEN shall respond to any such request within a reasonable delay of no more than thirty (30) days following receipt of a formal request for access to Personal Information, subject to the formalities, limitations and extension of time limits permitted in the Privacy Laws. An individual may also withdraw his/her consent to the use and disclosure of his/her Personal Information.

Every individual who is given access to Personal Information is entitled to:

- request correction of the Personal Information where the individual believes there is an error or omission in the information; and
- require that a notation be attached to the information reflecting any correction requested but not made.

Formal requests for correction of Personal Information must be submitted in writing to SANEXEN's Privacy Officer.

## Request for Information and Complaints

You may contact the Privacy Officer at [confidentiel@sanexen.com](mailto:confidentiel@sanexen.com) for any inquiries related to this Privacy Policy and to file a complaint regarding non-compliance with the Privacy Laws.

## Updates of this Privacy Policy

From time to time, we may need to update this Privacy Policy. If we make material changes, we will let you know by posting a prominent notice of the update on our website and by any other means likely to reach you. If this Privacy Policy is updated, the revised version, as posted online, will take effect and apply to all.

# Definitions

In this Privacy Policy, the following terms have the following meanings:

“SANEXEN” shall mean *Sanexen Environmental Services Inc.* and its wholly owned operating subsidiaries.

“Personal Information” shall mean information about an identifiable individual, which can be identified either directly or indirectly, including but not limited to the individual’s name, personal address, e-mail, social insurance number and phone number. Note that business contact information (e.g. work email address and professional address), although included in the definition of personal information, is considered a less sensitive form of data to which many of the requirements of the *Quebec Act Respecting the Protection of Personal Information in the Private Sector* do not apply.

“Privacy Laws” shall mean the applicable privacy laws and regulations to which SANEXEN is subject.

The “Privacy Officer” shall mean the person appointed by SANEXEN to be accountable for SANEXEN’s compliance with the Privacy Laws.

“Third Party Service Providers” shall mean insurance providers, financial institutions, consulting firms, cloud, webhosting and data-processing services, legal services and other suppliers of services with whom SANEXEN shares Personal Information.