







# **Express Mondor Website Privacy Policy**

Current version: [add the date of publication on your website here]

This Privacy Policy (the " **Policy** ") sets out Express Mondor's practices with respect to the collection, use and disclosure of your personal information through technological means and applies to the situations set out in Section 2. For ease of reading, we refer to ourselves as " **Mondor**" or simply " **we** ".

For the purposes of this Policy, personal information is any information that allows a natural person to be identified, directly or indirectly.

By accepting our Policy or providing us with personal information after having had an opportunity to review it, you agree that your personal information will be treated in accordance with our Policy.

### 1. How can I contact our Privacy Officer?

If you have any questions about this Policy or our management of your personal information, you can contact our Privacy Officer:

By email: <u>vieprivee@expressmondor.net</u>

By mail: Attention: Our Privacy Officer: 231 Saint-Antoine Nord, Lavaltrie, J5T

2G7









## 2. How do we use your personal information?

How we will treat your personal information will depend on the nature of your interaction with us on our website, by telephone or by email. Below is a description of Mondor's collection and use of your personal information, with the understanding that we may also process your personal information as provided by applicable laws or otherwise with your consent.

In the course of our activities, we process your personal information through technological means in the manner set out in sections 2.1 to 2.2:

- 2.1 When you communicate with our team via our website or by email;
- 2.2 When you send us your application.

## 2.1 When you communicate with our team via our website or by email

# How do we collect your personal information?

We collect your personal information directly from you when:

- You send us an email;
- You fill out a request for a quote (transportation or logistics);
- You fill out the contact form on our website.

# What categories of personal information are collected and for what purposes do we use it?

| Class of Information  | Usage   |
|---|---|
| Identification information: Last name, first name, email address and telephone number if these are your personal contact information. | Confirm your identity and allow the appropriate Mondor personnel to communicate with you. |
| Content of the message (if personal information is provided).   | Identify your needs in order to respond to your request.                                  |









**Professional Information**: For professional inquiries, please provide your workplace email address and phone number. Important: We ask that you do not include any personal information that is not necessary for the content of the message.

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# Who has access to personal information?

Mondor personnel, whose duties require it, will have access, in whole or in part, to your personal information.

We use service providers who provide software and cloud services to collect, store and process your personal information on our behalf.

Our email inbox is managed by a designated service provider.

### 2.2 When you send us your application

## How do we collect your personal information?

We collect your personal information when you send us your application by filling out the application form on our website, by sending us your application by email or by applying via a specialized recruitment website.

# What categories of personal information are collected and for what purposes do we use it?

| Class of information   | Usage  |
|--|--|
| Identification information: First name, last name, email, phone number.        | To communicate with you, to evaluate your application for employment or to allow us to manage any follow-up in connection with this application. |
| CV and any other relevant document (cover letter, presentation message, etc.). |  |

# Who will have access to your personal information?

We restrict access to your personal information to those Mondor employees who require such access as part of the recruitment process (human resources, internal team members related to the position to be filled, technical and administrative support).

We use service providers who provide software and cloud services to collect, store and process your personal information on our behalf.









We may share your personal information with a provider of criminal background and other screening services.

### 3. Minors under 14 years of age

We do not knowingly collect personal information from anyone under the age of 14. If you are a minor under the age of 14 and you are browsing our website, you may not provide us with any personal information without the express consent of a parent or the person with parental authority. If you are a parent or guardian and you are aware that your children have provided us with personal information, please contact us. If we discover that we have collected personal information from a person under the age of 14 without obtaining the consent of the person with parental authority or guardian, we will take steps to delete that information from our systems.

#### 4. What identification, profiling or location technologies do we use?

We use technologies to identify, locate or profile you through the use of cookies. You can enable these technologies by accepting cookies identified as being used for identification, profiling, or location on the cookie banner on our website. For more information, we refer you to the cookie banner on our website and our cookie policy in Appendix A hereof.

# 5. Where do we store personal information and is it transferred outside of Quebec?

Some information is held in paper format and is kept in our filing cabinets. Access to these filing cabinets is limited to Mondor employees who need them in the course of their duties.

Your personal information is primarily held virtually on Mondor's servers in Quebec or on the servers of our service providers with whom we do business and that are located outside of Quebec.

Your personal information is disclosed outside of Québec only if we believe that it is adequately protected. Communication will also be governed by an appropriate contractual agreement.

#### 6. Safeguards and protection of your personal information

We deploy adequate security measures to protect your personal information. In particular, we have put in place appropriate physical, technical, and administrative safeguards to ensure the protection of your information.









In particular, we have implemented access control measures to limit access to your personal information only to those employees who need to have access to it in the course of their duties.

If you have reason to believe that personal information has been compromised, please contact our Privacy Officer using the contact information provided in Section 1 of this Policy.

#### 7. What are your rights with respect to your personal information?

The law gives you different rights with respect to your personal information. In particular, you have the following rights:

#### 7.1 Access to Your Personal Information

You can ask us if we hold any personal information about you and, if so, you can request access to that personal information.

#### 7.2 Rectification

You may request that we rectify any incomplete or inaccurate personal information we hold about you.

#### 7.3 Withdrawal of Consent

In some cases, you may withdraw your consent to the disclosure or use of the personal information we hold about you. You understand, however, that in such a case, we will no longer be able to process your requests in accordance with sections 2.1 and 2.2 of this Policy.

### 7.4 Portability

You may request that we disclose your personal information to you or to another organization in a structured, commonly used technology format.

### 8. How can you exercise your rights?

To exercise any of your rights above, please contact our Privacy Officer at the contact information provided in section 1 of this Policy.









# 9. How do you make a complaint about our handling of your personal information?

Mondor takes requests, complaints and comments about how we handle your personal information very seriously. We invite you to contact our Privacy Officer to submit complaints or comments about our privacy practices.

Your complaint will be reviewed by our Privacy Officer, who will determine whether the handling of your personal information is in accordance with our privacy program, as well as any applicable laws.

You can also file a complaint with the Commission d'accès à l'information du Québec using the form available on the Commission's website. However, we encourage you to contact our Privacy Officer first.

#### 10. External sites or services

This Policy does not apply to third-party websites, pages or applications that can be accessed through our website. If you follow such links, these third-party sites or services will likely have their own privacy policies that you should review before submitting your personal information.

# 11. How do we update this Policy?

In order to ensure clarity and transparency in our Privacy Policy, it may be amended from time to time. Changes will be published on Mondor's website, along with the date of the last update. The changes will be effective on the date of the last update.









# Summary of our internal privacy governance policy

Mondor is committed to protecting your personal information throughout its life cycle, in accordance with its privacy practices and in accordance with the requirements contained in applicable laws.

In addition to our Privacy Policy, Mondor has an internal governance policy with respect to personal information, the purpose of which is to set out the principles governing the protection of personal information in the context of its operations.

The objectives of our internal governance policy are:

- i. Ensure the appropriate, secure, compliant and transparent handling of your personal information;
- ii. Establish guidelines for the handling of personal information by Mondor throughout its life cycle; and
- iii. Define the roles and responsibilities of the Privacy Officer and our staff.

# 1. Roles and responsibilities

Since respecting your personal information is everyone's business at Mondor, our Privacy Officer is supported by a team that is aware of the protection of personal information as well as the rights of the individuals concerned.

Each member of our staff has a role to play in ensuring that we can act in accordance with our privacy program. In fact, each member of our staff is called upon to:

- i. Direct any questions or comments to the Privacy Officer about how we handle or should treat your personal information;
- ii. Participate in training and awareness activities on the importance we place on the protection of personal information.

# 2. Guiding Principles for Governance

Mondor recognizes the importance of the protection, confidentiality and security of the personal information it handles in the course of its activities and the importance of raising awareness among its staff and partners on this subject.









Mondor has prepared best practice and prohibited practices guidelines regarding how we may handle your personal information, for example:

- i. We determine the purposes and objectives before we collect your personal information. Thereafter, your personal information is used only in accordance with those purposes and objectives;
- ii. We seek to collect only the bare minimum in order to achieve the identified purposes;
- iii. We strive to obtain your consent at the time we collect your personal information, and when it is sensitive personal information, we seek your express consent;
- iv. We display our Privacy Policy in a clear and prominent manner when we collect your personal information through technological means;
- v. We ensure that our technology products or services with privacy settings provide the highest level of privacy by default, without any intervention on your part;
- vi. We do not use technologies that enable identification, location or profiling without disclosing this practice and informing you how to enable such features;
- vii. We conduct privacy impact assessments when required by law, and when we consider that the processing of your personal information poses risks to your privacy:
- viii. To the extent possible, we limit access to your personal information only to those of our staff and service providers who need to have access to your personal information in the course of our operations;
  - ix. We do not share your personal information with third parties without your consent, except as permitted by law.

# 3. Confidentiality incident

Mondor has a process in place to respond to and address privacy incidents.

Under this process, Mondor must take reasonable steps to reduce the risk of serious harm and review its practices to prevent confidentiality incidents.

Mondor documents all confidentiality incidents in its Confidentiality Incident Log and will adapt its privacy program as necessary, following a confidentiality incident.









# APPENDIX A

# Policy on the use of cookies and analytics tools

This Policy Regarding the Use of Cookies and Analytics Tools ("**Cookie Policy**") describes how Mondor uses cookies, web beacons and other identification, profiling and location technologies ("**cookies**") on its website.

Our Cookie Policy supplements our Privacy Policy and should therefore be read in conjunction with it.

## 1. What do you need to know about cookies and web beacons?

#### 1.1. What are cookies and what are web beacons?

Cookies are small text files that are downloaded to your device when you visit a website, use a mobile application, or download an email. Cookies allow a website to recognise a device and store information (e.g. about your preferences, your use of the website) and to read that information each time you access the website.

There are two types of cookies: (i) primary; and (ii) third parties. Essentially, the two types are technically identical and perform the same functions; The main difference is how they are created and how they are then used.

**Primary Cookies**. Primary cookies are created by the website you are visiting. A website can only access cookies that it has placed on your device, so that, for example, cookies placed during your visit to a search engine are not accessible by our websites.

**Third-Party Cookies**. Third-party cookies are created by a site other than the one you are visiting and are primarily used for profiling and behavioral advertising purposes. They also allow website owners to provide certain services. This type of cookie can be placed by what is known as a web beacon (more on this below). Because a website can only access cookies that it has placed, we cannot access third-party cookies placed on any of our websites.

A web beacon, often referred to as a "web beacon," is a transparent image, usually 1 pixel x 1 pixel, that is placed on a website or in an email to evaluate how a user interacts with specific content. Web beacons work by sending information with the request to the third party's web server when requesting the web beacon to be displayed.









# 1.2. What can you do to control the cookies placed on your computer?

Most browsers allow you to configure how cookies are accepted by your browser. Please keep in mind that changing your cookie settings may prevent some websites from working properly. Please refer to your browser's documentation for information on how to configure cookie settings.

You can also use your browser's private or incognito mode which will automatically delete any cookies placed during your use of private mode, when all private mode tabs are closed. Refer to your browser's help section to learn more about how Private Mode works.

Some newer browsers have a built-in feature to block or control content that allows profiling. We invite you to consult the help section of your browser to see if such a feature is available. Some browsers may have extensions created by third parties that can be used to manage and delete cookies. If you decide to use extensions, we encourage you to pay close attention to the extensions you install and the permissions they need.

You can also opt out of our use of cookies and similar technologies that allow us to profile and display advertising on third-party sites.

#### 2. How do we use cookies on our website?

#### 2.1 Why do we use cookies on our website?

Mondor may use cookies in particular to improve your user experience, enable certain features and analyze traffic on our website. For more information on the cookies used, please consult the cookie banner on our website.

# 3. Analytics tools to measure interaction with our website

#### 3.1 What you need to know about analytics

Analytics tools are used to collect, analyze and measure web traffic and user visits to our website for the purpose of understanding and optimizing the use of our website. Analytics tools work by collecting information about a visitor's interactions with one or more web pages. This information includes, for example, the average number of pages visited by a user.

#### 3.2 What analytics tools do we use on our website?









Mondor may use analytics tools to understand how visitors interact with our website. For more information on the cookies used, please consult the cookie banner on our website.

# 3.3 What can you do to prevent a website from collecting analytical information?

There are a number of steps you can take to prevent a website from collecting details about your browsing. You can:

- Control which cookies your browser accepts (see section 1.2);
- Install extensions on your browser to disable the use of analytics tools.