



Confidentiality policy and procedure for handling confidentiality incidents

(Article 3.2 of the Act respecting the protection of personal information in the private sector, chapter P-39.1 and Regulation respecting confidentiality incidents)

PREAMBLE

Groupe Bibeau Inc. is responsible for protecting the personal information it holds. Personal information is confidential except as provided by law.

Any person who, in the course of their duties, has access to personal information held by Groupe Bibeau Inc. must take the necessary means to ensure its protection and confidentiality. This procedure determines the measures to be taken to reduce the risks of harm being caused, in such a case, and to prevent new incidents of the same nature from occurring.

1. OBJECTIVE AND NORMATIVE FRAMEWORK

This procedure specifies the steps to take when Groupe Bibeau Inc. has reasonable grounds to believe that a confidentiality incident has occurred, involving personal information that it holds, or if such an incident is proven, in accordance with the Act respecting the protection of personal information in the private sector, chapter P-39.1 and the Regulation respecting confidentiality incidents).

2. DEFINITIONS

The definitions to be considered for the application of this procedure, which may be supplemented by any other regulation, policy, directive or procedure referring to it, are as follows:

Confidentiality incident: access, use, communication of personal information not authorized by law, as well as its loss or any other form of breach of its protection.

Here are some examples:

- A hacker infiltrates a system;
- A person uses personal information from a database to which he has access in the course of his duties with the aim of usurping the identity of a person;
- A communication is made by mistake to the wrong person;
- A person loses or has documents containing personal information stolen;
- A person interferes with a database containing personal information in order to alter it.



Personal information: any information which concerns a natural person and which allows them to be identified. A person's name, taken in isolation, is not personal information. However, when this name is associated or combined with other information relating to the same person, it then becomes personal information.

Examples of personal information include:

- A person's name and date of birth;
- Social Security number;
- Credit card number or other financial information;
- A person's name and home telephone number;
- A person's name and home address.

Sensitive personal information: personal information is considered sensitive when, by its nature, in particular medical, biometric or financial, or because of the context of its use or communication, it gives rise to a high degree of reasonable expectation of respect. of private life.

In the context of Groupe Bibeau Inc.'s activities and the information held by Groupe Bibeau Inc. , it is rare that this involves sensitive information but, in some cases, it may involve financial or other information.

3. PRIVACY COMMITMENTS

- We are responsible for the personal information entrusted to us;
- We explain to our customers why we need this personal information when requesting it;
- We must ensure that we obtain your consent to the disclosure of your personal information. We consider having obtained such consent when there is voluntary acquiescence, written or verbal, to provide such information for the purpose of entrusting us with a contract;
- We request that we be provided with only the personal information that will be necessary for us to perform the required contract;
- We use this personal information only for the purposes of the contract to be performed or as required by law;
- We protect the personal information entrusted to us;
- We take the security of personal information very seriously.



4. PROTECTION OF PERSONAL INFORMATION

Groupe Bibeau Inc. implements appropriate and reasonable security measures to protect personal information against loss or theft, and against access, disclosure, copying, use or modification unauthorized by law. Only staff members who absolutely must have access to personal information as part of their duties are authorized to access it.

Persons who are members of Groupe Bibeau Inc.'s staff or who work on its behalf must, in particular:

- Make reasonable efforts to minimize the risk of unintentional disclosure of personal information and take reasonable steps to protect personal information as it moves from one location to another;
- Take special precautions to ensure that personal information is not monitored, overheard, accessed or lost when working on non-company premises.

5. COOKIES POLICY

Groupe Bibeau Inc. uses the services of third-party sites, such as Google and Facebook, to inform its customers and maintain its website. When you visit our website or third party sites, these sites may use cookies or other similar technologies on your hard drive to collect or receive information about your browsing on the website. The use of cookies allows Groupe Bibeau Inc. to facilitate your navigation on its website. However, cookies never allow a user to be personally identified.

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You can view cookies and destroy them at any time. If this is the case, we advise you to refer to your browser settings to make the appropriate changes.

6. REPORTING A CONFIDENTIALITY INCIDENT

Any person to whom Groupe Bibeau Inc. communicates personal information (customers, suppliers, partners, experts including subcontractors) must make a report when they have reasonable grounds to believe that a confidentiality incident involving information has occurred. personnel owned by Groupe Bibeau Inc. To do this, this report must be made without delay to the person responsible for the protection of personal information.

Groupe Bibeau Inc. or a member of staff who has reasonable grounds to believe that a confidentiality incident involving personal information held by Groupe Bibeau Inc. has occurred must also notify their supervisor or the person responsible for the protection of personal information without deadline.



7. PERSONS RESPONSIBLE FOR PERSONAL INFORMATION (PRP): ROLES AND RESPONSIBILITIES

The person responsible for the protection of personal information (hereinafter “PRP”) for Groupe Bibeau Inc. is Ms. Nathalie Bibeau. She can be reached at the following contact details:

Email: confidentiality@groupebibeau.com

Telephone: 450 889-5505 ext. 227

Its role is in particular to:

- Contribute to the implementation of the information security incident management process;
- Maintain the register of information security incidents that may have jeopardized information security, document these incidents and keep the director of information security informed as well as the general secretary or the general secretary;
- Contribute to information security risk analyzes in order to identify threats and vulnerable situations and implement appropriate solutions.

In the event of a confidentiality incident, the person responsible for the protection of personal information takes charge of handling the incident and partners with any other useful person depending on the nature of the incident.

As such, the PRP:

- Assesses the risk of harm being caused and determines the degree of severity. During this assessment, the sensitivity of the information concerned, the anticipated consequences of its use and the probability that it will be used for harmful purposes are considered.
- Diligently notifies the person whose personal information is concerned by the incident, when it presents a risk that serious harm will be caused, except when this would be likely to hinder an investigation carried out by a person or by an organization who, under the law, is responsible for preventing, detecting or suppressing crime or offenses against the laws. This notice must contain the following information:
 - a) A description of the personal information affected by the incident or, if this information is not known, the reason justifying the impossibility to provide such a description;
 - b) A brief description of the circumstances of the incident;
 - c) The date or period when the incident took place or, if the latter is not known, an approximation of this period;



- d) A brief description of the measures that the organization has taken or intends to take following the occurrence of the incident, in order to reduce the risk of harm being caused;
 - e) The measures that the organization suggests the person concerned take in order to reduce the risk of harm being caused to them or to mitigate such harm;
 - f) Contact details allowing the person concerned to find out more about the incident.
- Notify, where applicable, any person or organization likely to reduce the risk, by communicating only the personal information necessary for this purpose, without the consent of the person concerned.
 - Notify, diligently and in writing, the Commission for Access to Information of the confidentiality incident when it presents a risk of serious harm being caused. The notice must contain the following information:
 - a) The name of the business and the Quebec business number assigned to it under the Act respecting the legal publicity of businesses;
 - b) The name and contact details of the person to contact within Groupe Bibeau Inc. regarding the incident;
 - c) A description of the personal information affected by the incident or, if this information is not known, the reason justifying the impossibility of providing such a description;
 - d) A brief description of the circumstances of the incident and, if known, its cause;
 - e) The date or period when the incident took place or, if the latter is not known, an approximation of this period;
 - f) The date or period during which Groupe Bibeau Inc. became aware of the incident;
 - g) The number of people affected by the incident and, among these, the number of people who reside in Quebec or, if not known, an approximation of these numbers;
 - h) A description of the elements which lead Groupe Bibeau Inc. to conclude that there is a risk that serious harm will be caused to the persons concerned, such as the sensitivity of the personal information concerned,



the possible malicious uses of this information, the anticipated consequences of its utilization and the likelihood that they will be used for harmful purposes;

- i) The measures that Groupe Bibeau Inc. has taken or intends to take to notify the people whose personal information is affected by the incident, as well as the date on which the people were notified or the expected execution time;
 - j) The measures that Groupe Bibeau Inc. has taken or intends to take following the occurrence of the incident, in particular those aimed at reducing the risks of harm being caused or at mitigating such harm and those aimed at preventing new incidents of the same nature does not occur, as does the time limit in which the measures were taken or the time limit for execution envisaged;
 - k) Where applicable, a statement specifying that a person or organization located outside Quebec and exercising responsibilities similar to those of the Commission of access to information with regard to monitoring the protection of information personnel was notified of the incident.
- Diligently notifies Groupe Bibeau Inc. 's insurers, if applicable.
 - Enters the confidentiality incident in the register provided for this purpose.
 - At the request of the Commission for Access to Information, transmit a copy of this register.

8. REGISTER OF CONFIDENTIALITY INCIDENTS

Groupe Bibeau Inc. must keep a record of confidentiality incidents.

The information contained in the register must be kept up to date and retained for a minimum period of five (5) years after the date on which Groupe Bibeau Inc. became aware of the incident.

9. ENTRY INTO FORCE

This procedure comes into force on January 24, 2024

Signed in St-Félix-de-Valois, this January 24, 2024.

A handwritten signature in blue ink that reads "Nathalie Bibeau".

Nathalie Bibeau, CEO