	Groupe SM Tardif inc.		page 1 of 4
	PO-022 – Privacy and Personal Information Protection Policy	Rev.: 0	

PRIVACY AND PERSONAL INFORMATION PROTECTION POLICY

The Groupe SM Tardif and his subsidiaries recognize the importance to protect personal information, meaning all information regarding anybody's physical appearance which allows to identify them directly or indirectly.

This *Privacy and Personal Information Protection Policy* describes the mesures applied by the Groupe SM Tardif and it's subsidiaries to ensure the protection of personal information they collect, use, disclose, process and retain for the purpose of operating its websites as well as its day-to-day business activities.

This Policy is intended to comply with the provisions of the *Act Respecting the Protection of Personal Information in the Private Sector*, as amended by the Act 25, *Act to modernize legislative provisions regarding the protection of personal information in the private sector*.

This Policy does not cover internet sites operated by third parties whose hyperlinks is present on the Groupe SM Tardif's website. Therefore, the Groupe SM Tardif and its subsidiaries websites cannot be held responsible for the policies, procedures and practices of these third parties with respect to the protection of personal information.


1. Collection of personal information

For the purposes of this Policy, the collection of personal information by Groupe SM Tardif and its subsidiaries includes only that which is necessary for the purposes of their activities. This includes information relating to a person's identity, such as names, address, telephone number, e-mail address, date of birth and other demographic information, as well as information relating to the use of Groupe SM Tardif and its subsidiaries' websites.

The Groupe SM Tardif and its subsidiaries collect, use and disclose personal information for the purposes specified at the time of collection. For example, when a person completes an information request via the website.

Examples of purposes for which Groupe SM Tardif and its subsidiaries collect personal information include, but are not limited to:

- Manage requests relatives to products and services offered;
- Evaluate a file as part of a nomination for a position identified in the careers section;
- Meet regulatory and legal obligations;
- Confirm the identity of individuals, verify the accuracy of personal information and the information.

	Groupe SM Tardif inc.		page 2 of 4
	PO-022 – Privacy and Personal Information Protection Policy	Rev.: 0	

2. Consent

By consulting, contacting, consenting or entering into any contractual relationship with the Groupe SM Tardif or one of its subsidiaries, you agree to the terms of this Policy.

3. Use of personal information

All personal information stored on the servers of Groupe SM Tardif and its subsidiaries is secure and accessible only to employees who have the right to access it in the course of their duties. The principle of least privilege is followed in granting access to personal information according to the role and responsibilities of users.

Third parties (partners and suppliers) can also access personal information collected to carry out their mandate. They will not be able to access personal information beyond what is reasonably necessary to fulfill the given purpose.

The Groupe SM Tardif and its subsidiaries will not sell or share personal information with other third parties except in the following cases:

- It is required by law;
- It is required for any legal proceedings;
- It is necessary in order to prove or protect legal rights;
- As part of a business transaction to potential buyer if the company is to change ownership.

4. Retention of personal information

The Groupe Sm Tardif and its subsidiaries preserve personal information on servers located in the province of Quebec, Canada.

The Groupe Sm Tardif and its subsidiaries are committed to taking reasonable security measures to protect the personal information collected.


Personal information collected by the Groupe SM Tardif and its subsidiaries shall not be retained beyond what is necessary to fulfill the purposes for which it was collected.

Despite the foregoing, the Groupe SM Tardif and its subsidiaries will retain personal information when it will be required in order to comply with applicable legal obligations.

Employees of the Groupe SM Tardif and its subsidiaries are bound by confidentiality agreements. Training regarding information security and privacy awareness is offered on a regular basis to all employees. IT systems comply with industry-recommended security frameworks and protocols.

5. Withdrawal of consent

Consent for the Groupe SM Tardif and its subsidiaries to use or disclose personal information may be withdrawn at any time.

	Groupe SM Tardif inc.		page 3 of 4
	PO-022 – Privacy and Personal Information Protection Policy	Rev.: 0	

Any request to withdraw consent must be communicated to the Privacy Officer, whose contact details are given in section 11.

6. **Right of access and rectification**

Upon written request and proof of identification, the personal information we have collected, used or disclosed may be consulted. Where applicable, corrections may be requested, as authorized or required by law.

7. Right to **file** a complaint

Any questions regarding personal information or complaints after a non-compliance with the principles set out in the Policy should be forwarded to the Privacy Officer, whose contact information can be found in section 11.

8. **Collection and use of non-personal information**

Cookies, web beacons and other data analysis and personalization technologies allow the collection of non-personal information. Most major sites including the Groupe SM Tardif and those of its subsidiaries, use these technologies to better serve their users.

Non-personal information cannot be used to identify visitors to the websites or to draw up user profiles. It is compiled to provide statistical information on traffic patterns and to measure the effectiveness of the Groupe SM Tardif and its subsidiaries' websites. This data may be used to improve site content and determine which services or features are most important to our users.

You can accept or reject cookies by modifying your browser settings.


9. Copyright

All content on the websites of Groupe SM Tardif and its subsidiaries belong to them. It is protected by intellectual property laws and regulations, particularly with regard to copyright, and may not be used, reproduced or communicated without the prior written consent of the Groupe SM Tardif and its subsidiaries.

10. Policy update

This Policy may be amended from time to time to maintain compliance with the Act and to reflect any changes to the personal information collection process.

It is therefore recommended that users consult this Policy online, on our websites from time to time to keep up to date regarding the latest changes.

	Groupe SM Tardif inc.		page 4 of 4
	PO-022 – Privacy and Personal Information Protection Policy	Rev.: 0	

11. Contact

Requests for access of personal information, correction, withdrawal of consent, as well as questions or comments regarding our Privacy Policy should be sent to the attention of the Privacy Officer by mail or e-mail at the following address:

Privacy Officer
Groupe SM Tardif
15971, boulevard de la Colline
Quebec (QC) G3G 3A7
confidentialite@sm-inc.com

Effective: September 22, 2022

Last update: August 21, 2023

Approved by: President et Chief Executive Officer