



## **Policy on the Protection of Personal Information in the Private Sector**

*Prepared by:*

*The Corporate Privacy Committee for the Protection of Personal Information.*

*Phipps Dickson Integra (PDI) Inc.*

*Harling Marketing Inc.*

*PDI Large Format Solutions Inc.*

This Privacy Policy sets out the standards and procedures that PDI implements to ensure the confidentiality, security, and integrity of the privacy of our customers, employees, business partners, and users of our websites, applications, call centers and all other channels through which PDI collects and uses your personal information in accordance with applicable laws on protection of personal information. Our commitment to the protection of personal data is essential to building trust with all stakeholders in our business. Its purpose is to inform any user of the confidential nature of the privacy data that may be collected and used by PDI or third parties as well as that which may be communicated to authorized third parties in certain special cases, if permitted or required by law.

The Privacy Policy and its interpretation, execution, validity, and effects are subject to the provincial and federal laws applicable in the province of Quebec, Canada, as applicable.

### **Web Sites**

All references to "websites" in this Privacy Policy refer to the following sites: [www.groupepdi.com](http://www.groupepdi.com), [www.pdi-gf.com](http://www.pdi-gf.com), [www.harlingdirect.com](http://www.harlingdirect.com) and any other websites or applications developed by PDI Inc., PDI Large Format Solutions Inc. and Harling Marketing Inc. (divisions of PDI Group Inc.).

Browsing the Website, simply activating any of the hyperlinks, downloading or using a web application or downloading any document constitutes acceptance of this Privacy Policy and implies your knowledge of the scope of this Privacy Policy. WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, USER CONSENTS TO PDI COLLECTING, USING, PROCESSING AND DISCLOSING HIS/HER PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY.

PDI reserves the right to revise the terms of this Privacy Policy at any time without notice. Use of a website after the revision of the Privacy Policy will constitute acceptance of the changes made to it. You are therefore invited to consult this Privacy Policy on a periodic basis.

### **Collection and Use of Personal Information**

Personal information is any information about an identifiable natural person. This may include, but is not limited to, name, address, telephone number, email address, social insurance number, financial, medical, biometric, or otherwise intimate data, or because of the context of its use or disclosure, gives rise to a reasonable degree of expectation of privacy.

The processing of personal data may include any operation performed on personal information, such as collection, recording, retention, use, disclosure, and destruction.

We collect only the personal information necessary for the specific purposes identified to the individual concerned, and we do not use it for any other purpose without the individual's explicit consent, except as permitted or required by law. Personal information is collected in particular but not limited to when purchasing our products and services, when using our websites or web applications, when you subscribe to newsletters, when you submit an application to us online, by email or by mail, when you apply, when you are hired or when authorized by law or with your consent through third parties, co-contractors, vendors or suppliers who provide products and

services to us. We inform individuals of the specific purposes for collecting their personal information and use it only to the extent that those purposes are relevant.

Please also note that we collect certain non-personal analytical data regarding the use of our websites which is used for customer experience optimization and analytics purposes. This information may, from time to time, be disclosed to third parties, including in connection with the services offered by Google Analytics. For more information, please see ["How Google uses data from sites or apps that use its services"](#) and ["Google Analytics and Privacy"](#).

## **Disclosure of Personal Information**

In general, PDI uses the personal information collected for internal purposes only. However, PDI may disclose the personal information collected to the following individuals, namely:

1. To external service providers with whom PDI has entered into a contractual agreement that provides comparable levels of privacy protection and who use this personal information, particularly in connection with employee services such as pay processing services, group insurance, union, investment funds or any other employee service.
2. To PDI's service providers (e.g. social networks, search engines or analytical services such as Google Analytics) who offer audience analysis tools or measurement reports on individuals who see advertisements or ads or who perform online searches based on preferences, interests, demographic parameters or from geographical areas, to enable PDI to target Lookalike Audiences for advertising purposes; or
3. To manufacturers, manufacturers, subcontractors and/or partners of PDI for services such as delivery, graphic design service and installation service; or
4. Foundations or non-profit organizations affiliated with or partnering with PDI.
5. To third parties if required or permitted by law.

PDI may disclose your personal information to third parties, who fall into the categories listed above, who operate outside Quebec. To this end, PDI conducts a privacy impact assessment with each of these third parties and always ensure that when your information is communicated outside Québec, it benefits from adequate protection, particularly with regard to generally recognized privacy protection principles.

## **Conservation and security**

PDI retains personal information for as long as necessary to fulfill the purposes for which it was collected, unless otherwise required by law.

We implement appropriate security measures to protect personal information from unauthorized access, disclosure, use, modification, or destruction. These safeguards may include the use of secure transaction tools and physical safeguards to restrict access to IDP offices and records that may contain privacy data collected, used, and disclosed.

Access to personal information is limited to authorized employees and third parties who need it to perform their specific functions and is subject to confidentiality obligations.

Without limiting the generality of the foregoing, PDI websites have certain mechanisms or features that allow for the greater protection of Users' personal information, including:

Online order forms are protected and can only be accessed from a secure area;  
All communications between the different components of the websites are encrypted; Commands transmitted by a user are hosted on a secure server;

PDI's IT service subcontractors are required to comply with various ongoing security obligations, including ongoing validation of security practices and processes and continuous monitoring of website software components and updates.

### **Your commitment**

When the user has to transmit confidential information via a website, he can ensure that he is in a secure environment when the security seal (closed padlock) appears in the top window of the Internet browser. The user can click on the padlock to obtain information on the security seal.

Also, after completing a transaction through a website, or when, during the session, the user must temporarily leave his computer and leave it unattended, it is important to log out and log out of his account. To close the session securely, the User must click on "Cancel", clear the cache of the Internet browser and then close the Internet browser.

## **Access and rectification**

PDI takes all reasonable steps to ensure that the personal information it collects remains accurate, complete and up-to-date and relies on the cooperation of stakeholders to notify us when changes occur. We are committed to correcting any inaccuracies or incompleteness in personal information as soon as possible and appropriate. Any individual covered by this policy has the right to review and request correction of their personal information by contacting the Data Protection Officer at the contact information set out at the end of this document.

Upon written request, we will inform any individual of the existence, use and disclosure of their personal information, unless prohibited by law. In the event that a request is forwarded to PDI, it will be acted upon expeditiously. In the event that PDI cannot provide access to certain personal information collected, PDI will then ensure that the individual is informed of the reasons for such an impediment as well as the recourse available to it in such a case.

## **Cost**

Access to the personal information that appears in the file is free of charge. However, reasonable fees may be charged to offset the costs of transcription, reproduction, or transmission of such personal information. In such a case, the person will be notified of the amount that may be charged in advance.

## **Conservation and security**

PDI will retain, use or disclose personal information for as long as necessary to fulfill the purposes for which it was collected, unless otherwise required by law. PDI will establish retention deadlines and procedures for the retention and destruction or secure anonymization of personal information, all in order to maintain the confidentiality of personal information and to comply with its obligations under applicable laws.

## **Confidentiality Incidents.**

PDI maintains a record of any known security incident, as defined in the Act respecting the protection of personal information in the private sector (CQLR c P-39.1), that may affect the security or confidentiality of your personal information. If an incident poses a risk of serious harm to you, PDI will take steps to notify you, subject to applicable legislation. The assessment of the risk of injury shall be based on the sensitivity of the intelligence concerned, the anticipated consequences of its use and the likelihood that it will be used for harmful purposes.

## **Complaints and Follow-up**

Files that may contain personal information are usually kept at PDI's head office. If you have any complaints or other questions regarding personal information or the application and interpretation of this statement, you may contact the Data Protection Officer at the contact information provided at the end of this document.

We handle privacy complaints confidentially and promptly.

We regularly conduct an internal assessment of our compliance with this policy and make the necessary improvements in the event of non-compliance.

### **Office of the Privacy Officer for the Protection of Personal Information**

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Kirkland, Québec

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