

Privacy Policy

Company
Policy

TERMONT

This Privacy Policy summarizes the privacy practices of Termont relating to Personal Information collected electronically and outlines the measures Termont takes with respect to the collection, use, disclosure, protection and handling of Personal Information for compliance purposes with its obligations under the Privacy Laws.

1. *Collection of Personal Information*

- a. Termont only collects Personal Information from individuals as required to carry out its activities, including but not limited to its recruiting activities.
- b. The collection by Termont of an individual's Personal Information is subject to its prior consent.
- c. To the extent reasonably possible, Personal Information is directly collected from the individual to whom the information relates unless such individual authorizes Termont to collect the Personal Information from a third party.

2. *Retention and Disposal of Personal Information*

Personal Information that has been collected by Termont may only be destroyed after the lapse of seven (7) years following the last time the Personal Information was used for the purpose it was initially collected, unless the individual consents to its earlier disposal.

3. *Accuracy of Personal Information*

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

4. *Use and Disclosure of Personal Information*

- a. Unless the individual consents otherwise and subject to the exceptions provided by the Privacy Laws, Termont 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.
- b. The use and disclosure by Termont of an individual's Personal Information for a purpose that is different from the one originally consented to is subject to such individual's prior consent.
- c. Termont may further disclose Personal Information collected to third party service providers consistent with the same purpose it was collected for.

5. *Security and Protection of Personal Information*

Termont protects the Personal Information of individuals that is in its custody or control using reasonable physical, organizational and technical security safeguards protecting the Personal Information against loss or theft, as well as unauthorized use and disclosure. To the extent that Termont is informed of a breach of security measures that constitutes a real risk of significant harm to a person, Termont shall notify the latter and transmit the information required by the Privacy Laws.

6. *Access to Personal Information*

Upon an individuals' written request, Termont 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 Termont's Privacy Officer. Termont shall respond to any such request within a reasonable delay of no more than 30 days of receipt of a formal request for access, subject to the formalities, limitations and extension of time limits permitted in the Privacy Laws.

7. *Access to Personal Information*

Every individual who is given access under Section 6 above 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;
- require that a notation be attached to the information reflecting any correction requested but not made, and
- require that any person or body to whom the information has been disclosed for use for an administrative purpose within two years prior to the time a correction is requested or a notation is required: (1) be notified of the correction or notation, and (2) where the disclosure is to another government institution, the institution make the correction or notation on any copy of Personal Information under its control.

Formal requests for correction of Personal Information must be in writing to the Privacy Officer of Termont.

8. *Request for information and complaints*

You may contact the Privacy Officer for any inquiries related to this Privacy Policy and to file a complaint regarding non-compliance with the Privacy Laws.

9. *Definitions*

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

“Termont” shall mean Termont Terminal Inc. and its operating non-wholly owned subsidiary Termont Montréal Inc.

“Personal Information” shall mean information about an identifiable individual, including but not limited to the individual’s name, postal address, e-mail and phone number.

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

“Privacy Officer” shall mean the Secretary of Termont.

As adopted by the Board of Directors on November 21, 2018