

Privacy Policy

Company
Policy

This Privacy Policy summarizes the privacy practices of TERMONT relating to Personal Information collected 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. Getting your Consent

- a. The collection by TERMONT of an individual's Personal Information for a specific purpose is subject to, as the case may be, its prior implied or express consent.
- b. TERMONT asks for an individual's additional consent each time it wishes to use the Personal Information collected, for a new purpose.
- c. An individual that has given its consent to the collection of Personal Information can withdraw such consent at any time.

2. Collection of Personal Information

- a. TERMONT only collects Personal Information from individuals as required to carry out its activities, recruit employees and to meet its legal obligations.
- b. Personal Information may be collected through an individual's disclosure or through a third party. 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.

3. Retention and Disposal of Personal Information

Subject to applicable laws relating to retention obligations and TERMONT's internal policies, Personal Information that has been collected by TERMONT destroyed, erased or made anonymous once it is no longer required for the purpose it was collected for, or earlier if so requested by the individual to whom the information relates.

4. 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.

5. 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.

6. Security and Protection of Personal Information

- a. TERMONT protects the Personal Information of individuals that is in its custody or control using reasonable physical, administrative and technical security safeguards protecting the Personal Information against loss or theft, as well as unauthorized access, use and disclosure.

Physical security measures include:

- Security guards
- Office access cards
- Locking filing cabinets

Administrative security measures include:

- Limiting access to the Personal Information to the employees and consultants that need to know it to perform their duties
- Compliance by TERMONT employees with the Code of ethics and Business Conduct and signing of the annual acknowledgment form, with strict rules governing the protection of Personal Information
- Making available to employees the Compliance Capsule Training relating to Privacy
- Implementing policies and procedures for monitoring, investigating and updating security systems and measures
- Performing ongoing monitoring and controls to detect suspicious activity and potential deviations from organizational directives and policies

Technical security measures will include:

- Password
 - Data encryption
 - Access management system
 - Performing monitoring and controls to detect suspicious activity
- b. Collected Personal Information is usually stored in Canada, but TERMONT may use Third Party Services Providers located outside of the country.
- c. Access to an individual's Personal Information is limited to TERMONT employees and consultants, Third Party Services Providers and governmental authorities, who need access for the specific purpose the Personal Information is collected. By abiding annually to the Code of ethics and Business Conduct, TERMONT employees commit to protect the confidentiality of the Personal Information they need while performing their duties. Third Party Services Providers must contractually agree to comply with and abide by strict standards for the protection and confidentiality of Personal Information, in accordance with this Privacy Policy and in accordance with applicable privacy laws.

- d. Subject to Privacy Laws, TERMONT may exceptionally be involved in the sale, merger or restructuring of some of its business or assets. In the course of such transactions, TERMONT may disclose Personal Information of individuals to the purchaser or the new corporate entity.
- e. 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.

7. *Right to Access, Correction and Annotation*

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.

Every individual who is given access 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; and
- require that a notation be attached to the information reflecting any correction requested but not made.

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, personal 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.

“Third Party Services Providers” shall mean insurance providers, financial institutions, consulting firms, cloud, web-hosting and data-processing services, legal services and other suppliers of services with whom TERMONT shares Personal Information.

As adopted by the Board of Directors on November 21, 2018, and amended on October 25, 2022.