

# Personal Information and Security Policy - Solutions de Repérage Emili Inc. Version 1.3

Revision Date: 2023-11-30

## Objectives and Scope

This Policy establishes best practices for protecting personal information and individual privacy in Emili's activities, taking into account the new provisions of the Canadian Law C-23, Quebec's Law 25, and other relevant legislation.

## Legal Obligations

Emili complies with various laws related to personal information protection and privacy, including, but not limited to, Quebec and Canadian laws, as well as the GDPR for European citizens.

## Commitment

Emili is committed to protecting personal information, processing data in accordance with this Policy and applicable laws. Security measures are tailored to the sensitivity and usage of the data.

## Protection of Personal Information

Personal information is treated with a high level of confidentiality and security, regardless of its format or location.

## Privacy by Design

Solutions developed by Emili integrate security and personal information protection principles throughout their lifecycle.

## Consent Acquisition

Emili obtains consent from clients before collecting, using, or communicating their personal data.

## Storage of Personal Information

Personal data are primarily stored on servers in Canada, but may also be processed and stored in other jurisdictions, adhering to necessary security measures.

## Communication of Personal Information

Emili communicates personal information only for specific services or with the explicit consent of the individuals concerned. Data transferred internationally are subject to the laws of the destination country.

## Requests for Access to Personal Information

Emili responds to requests for access to personal data within 30 days, in accordance with legal procedures and requirements.

## Security Measures

Physical, organizational, contractual, and technological security measures are implemented to protect personal information against loss, theft, or unauthorized access.

## Transfer of Personal Information

Third parties processing Emili's data must sign a personal information protection agreement reflecting the principles of this Policy, and security requirements for suppliers are outlined in the Security Policy for Service Providers.

## **Destruction of Personal Information**

Data are not retained indefinitely and are destroyed when their purpose is fulfilled or upon request from the individuals concerned, in accordance with our Data Erasure Policy.

## **Security Incident Notification**

Security incidents involving personal data must be notified as per the processes in Emili's Incident Response Policy.

## **Roles and Responsibilities**

Responsibilities for processing and protecting personal data are clearly defined for Emili's staff.

## **Revision**

This Policy is reviewed annually to remain compliant with legislative, contractual, and technological developments.