

Privacy and Data Protection Policy for Partners and Users

Preamble

Info-Excavation recognizes the importance of protecting your privacy and is committed to preserving the privacy of your personal information that is collected and processed in the course of its activities.

Endorsement

This policy is approved by Info-Excavation's Executive Committee and falls under the responsibility of the Privacy Officer.

Privacy Officer

The Privacy Officer is the President and Chief Executive Officer. The president may designate members of his or her team for specific aspects of the policy. The privacy officer can be reached at confidentialité@info-ex.com.

Objectives

The purpose of the Personal Information Protection Policy (hereinafter referred to as the “Policy”) is to set out the principles to be applied by Info-Excavation, and which will govern the personal information protection policy and practices (hereinafter referred to as the “PIPP”) regarding the use of information and its impact on the privacy of the person concerned.

The policy describes the PIPP standards and practices applied by Info-Excavation to:

- Protect the personal information and data collected by Info-Excavation throughout its life cycle: collection, use, disclosure, retention, destruction or anonymization, and in accordance with applicable legislative provisions;
- Ensure compliance with applicable legal requirements, including the Private Sector Privacy Act (Quebec), the Personal Information Protection Act (Alberta), the Personal Information Protection Act (British Columbia) and the Personal Information Protection and Electronic Documents Act (Canada) and accepted PIPP practices;
- Ensure the trust of all stakeholders and demonstrate transparency regarding the handling of personal information and PIPP measures applied by Info-Excavation.

Scope

The Policy applies to any personal information collected by Info-Excavation in the course of its activities and which concern an identified or identifiable person.

Definition

Personal Information (PI) means any information that relates to a natural person and that directly or indirectly identifies him or her.

Privacy Requirements

The policy reflects Info-Excavation’s ongoing commitment to comply with the PIPP requirements of the following individuals:

- Customers of Info-Excavation who are private individuals (excluding companies);
- Representatives of Info-Excavation’s service providers who are required to provide PI to establish a business relationship, except for business contact information;
- Info-Excavation employees, both current and past, other staff members and job candidates;
- Visitors and users of Info-Excavation’s website and mobile applications;
- Any other private individual whose PI is collected or processed in the course of its activities (collectively referred to as the “**Person Concerned**”).

Guidelines

Info-Excavation's PIPP practices are defined and applied in accordance with the following PIPP Guidelines, and in accordance with applicable laws:

Accountability

Info-Excavation is responsible for the use of PI in its possession, including information transferred to a third party. The appointed Privacy Officer ensures that the policy is applied across the organization and that Info-Excavation complies with applicable laws and regulations relating to PIPP.

Use of the Data Collected

Info-Excavation must explain why it collects, uses, discloses and stores PI before data is collected. Info-Excavation ensures that it collects only the PI that is necessary to meet the predetermined purposes. The purposes for which the PI will be used will be specified at the time it is collected. As of the date the Policy was adopted, the purposes for using PI are, but are not limited to:

- Assess customer needs and provide services that meet those needs;¹
- Confirm the identity and verify the accuracy of the personal information provided in the locate request and in the proposals and update the information, if needed;
- Manage the client history;
- Establish and maintain communication with its customers;
- Manage the relationship with job candidates as well as with its employees.

Collection of PI

Info-Excavation limits the collection of PI to the information that is necessary and the purposes for which it is used. Info-Excavation collects PI directly from the Person Concerned, unless it has obtained the person's consent to have his or her PI collected by a third party, and unless otherwise permitted by law. Info-Excavation can also receive PI from its partners.

Info-Excavation may also collect personal information when you visit its website or interact with its dialog box that is available online. This data is kept for 5 years for the purpose of doing locate requests follow-ups.

Info-Excavation may also collect other information about the use of its website through the use of a cookie file, commonly known as "cookies". These files make it possible to recognize the user when he accesses Info-Excavation's website and when he navigates from one page to the next. Info-Excavation uses these cookies to make the site more user-friendly and personalized, improve its services and generate statistics.

¹ Info-Excavation must collect the address of the person making the locate request to ensure the geographical locations of the request and generate answers.

Limitation of Use, Disclosure and Retention

Limitation

Info-Excavation limits the use of PI to the purposes for which it was collected and for which the Person Concerned consented to its collection, subject to exceptions provided for by law or by obtaining a new consent.

Info-Excavation limits access to PI that is in its possession only to those for whom access is required to perform their duties and when it offers PIPP training to its employees. Employees at Info-Excavation are bound by a confidentiality agreement which includes the confidentiality of any PI that is processed in the course of their duties.

Disclosure

Info-Excavation may disclose PI of the Person Concerned to various business partners, suppliers or other third parties in the course of its activities. It may also disclose them to courts, regulators, public officials, prosecutors or any other investigating or law enforcement authority. Info-Excavation ensures that PI is communicated only for the purposes identified and for which the Person Concerned has consented or subject to exceptions provided for by law or by obtaining a new consent.

Retention

Info-Excavation uses systems and technologies from service providers that ensure the retention and confidentiality of PI related to the Person Concerned. Info-Excavation retains data and documents containing PI for the duration necessary for the use for which it was collected and for the retention period prescribed by law.

PI is generally kept in the province of Quebec. It is nevertheless possible that the disclosure of PI to certain service providers may result in the transfer of PI outside Quebec, in which case, Info-Excavation will consult applicable PIPP laws and practices in the applicable jurisdiction and ensure that PI is adequately protected through a Privacy Impact Assessment policy and that the contractual agreement stipulates the respect of PIPP obligations.

Data Security Measures

Info-Excavation's data security measures are applied according to the sensitivity of personal information it possesses, and uses the means to prevent security breaches while ensuring the integrity and confidentiality of such information, in accordance with its data security management framework.

Transparency

Info-Excavation provides information on its PI management practices in a clear and simple format and makes them accessible on its websites. Info-Excavation provides the prescribed

information to the Person Concerned when the data collection is made through a technology whose functionalities allow the individual to be identified, located or profiled through the use of this technology.

Privacy Rights

Info-Excavation applies best practices related to privacy rights including the individual's rights of access, rectification of personal information or the right to withdraw his consent. Requests for exercising their privacy rights must be forwarded to the privacy officer, whose contact information appears at the end of the document, so that requests may be processed in accordance with the law.

Info-Excavation will respond to all requests no later than 30 days after the date the request was received. When Info-Excavation is unable to meet this deadline, or if additional time is required to satisfy a request, the Person Concerned will be informed in writing.

Info-Excavation respects the rights of the Person Concerned with respect to his PI and has established procedures to process the following requests:

Data Access

A Person Concerned has the right to request a copy of his or her PI kept by Info-Excavation or to consult them. However, data disclosure of PI is not possible where disclosure would reveal PI about another person or would constitute a violation of applicable laws.

Access to PI is free. In certain circumstances, in particular if the request is excessive or unfounded, Info-Excavation may charge the Person Concerned an administration fee for the transcription, reproduction or transmission of its PI. Before acting on a request, Info-Excavation will inform the Person Concerned if fees are applicable.

Data Accuracy

Info-Excavation aims to ensure that the data related to PI it collects and retains as part of its activities is accurate and will validate such data with the Person Concerned. Info-Excavation invites the Person Concerned to contact the Privacy Officer, whose contact information appears at the end of the document, if any PI is not accurate or if they need to be rectified.

Withdrawal of Consent

In certain circumstances, a Person Concerned may object to the processing of their PI and request that Info-Excavation block, delete and limit access to them for purposes that are not essential to the management and administration of its products and services. A request for the withdrawal of consent related to the performance of services offered by Info-Excavation will terminate the relationship between Info-Excavation and the Person Concerned.

Access Rights

Any person concerned may, upon request, obtain a copy of his personal information that has been collected. If the PI is computerized, the person may request that it be provided in the form of a written and intelligible transcript.

Complaints

The Person Concerned who believes his rights with respect to the PIPP have been infringed, may file a complaint to the privacy officer, the applicable supervisory authority or resort to the courts.

Privacy Officer

Info-Excavation has appointed a Privacy Officer to ensure that Info-Excavation complies with applicable privacy laws.

If you have any questions regarding the collection, use, disclosure or retention of PI made by Info-Excavation, you can contact the privacy officer, whose contact information appears below:

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