

Form to Designate a Privacy Officer and Delegate Responsibilities

A. HIGHEST AUTHORITY WITHIN THE COMPANY DELEGATING ALL OR PART OF THEIR DUTIES

<p>Last name : Doyon</p> <p>First name : Raynald</p> <p>Position within the company : President</p> <p>Company name : Stekar</p> <p>Address : 668 5^e Avenue, Beauceville QC G5X 1L6</p>
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B. DESIGNATED PRIVACY OFFICER

<p>Last name : Lavoie</p> <p>First name : Nadine</p> <p>Position within the company : Human Resources Manager</p> <p>Phone : 418-774-2424, ext. 21</p> <p>Fax : 418-774-2425</p> <p>Work address : 668 5e Avenue, Beauceville QC G5X 1L6</p> <p>Email address : nadine.lavoie@stekar.com</p>
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C. RESPONSIBILITIES

The company’s highest authority (section A) designates the Privacy Officer (section B) as the person in charge of the following.

<p>(Check only one box)</p> <p><input type="checkbox"/> Access to documents and protection of personal information</p> <p><input type="checkbox"/> Access to documents only</p> <p><input type="checkbox"/> Protection of personal information only</p> <p><input type="checkbox"/> Substitute, if the Privacy Officer is absent (does not show in the directory)</p> <p><input type="checkbox"/> If applicable, specify the type of files or documents</p>

This form hereby designates the person identified in section B as the Privacy Officer (referred to as the “person in charge of the protection of personal information” in the Act respecting the protection of personal information in the private sector).

Signature of the company’s highest authority

Date

Policies and Practices on Personal Information Governance

Here at **Stekar**, we are committed to protecting the privacy of our employees and ensuring the confidentiality of the personal information entrusted to us in the course of our business.

INFORMATION GATHERING OBJECTIVES

Our Privacy Policy describes our standards for the collection, use, disclosure, and retention of your personal information. It also explains how we protect your personal information and your right to access it.

PERSONAL INFORMATION

Personal information can be defined as any information or combination of information that concerns an individual and allows them to be identified (e.g., information on their financial situation, their social insurance number, driver's licence, or health insurance number). However, a person's name and professional contact information (job title, address, phone number, and email address) are not considered personal information. Personal information must be protected regardless of its form (written, graphic, audio, visual, computerized, or otherwise) or the medium on which it is stored.

CONSENT

Before obtaining information about you, we ask for your written consent to collect, use, or disclose your collected information for the identified purposes. If the purposes for which we collected your information change or we wish to add to them, we will seek your consent again.

Our company undertakes to use the information provided solely for the purposes for which it was collected and retain it as long as needed to provide the requested service. We may, however, collect, use, or disclose it without your consent where permitted or required by law. In certain circumstances, we may collect, use, or disclose personal information without your knowledge or consent. Such circumstances arise when, for legal, medical, or security reasons, it is impossible or unlikely to obtain your consent, or when the information is needed to investigate a possible breach of contract, prevent or detect fraud, or enforce the law.

LIMITS TO THE COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION

Personal information is generally collected to confirm an individual's identity, create an employee file, or comply with legal requirements (e.g., tax purposes). We limit the collection, use, and disclosure of your personal information to the aforementioned purposes. Your personal information can only be accessed by certain authorized persons, and only in the context of the tasks assigned to them.

INFORMATION RETENTION

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected. Afterwards, we destroy this information in accordance with the law and our records retention policy. When we destroy your personal information, we take the necessary steps to ensure that it remains confidential and that no unauthorized person has access to it during the destruction process.

ACCURACY

Personal Information shall be as accurate, complete, and up to date as necessary for the purposes for which it is to be used. Personal information that is used on an ongoing basis, including personal information that

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may be disclosed to third parties, will generally be accurate and up to date unless limitations on the accuracy of such information are clearly set out.

We do not routinely update personal information unless it is necessary to fulfill the purposes for which it was collected. The degree of accuracy, currency, and completeness of personal information will depend on the data you enter on the consent form.

RESPONSIBILITY

We are responsible for the personal information in our possession or custody, including information we entrust to third parties for processing. We require these third parties to store this information in compliance with strict confidentiality and security standards. Our Privacy Officer oversees this Privacy Policy and related processes and procedures to protect your personal information. Our staff is informed and properly trained on our privacy policies and practices.

SECURITY MEASURES

We have implemented and continue to develop rigorous security measures to ensure that your personal information remains strictly confidential and is protected against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. These security measures include organization-wide measures (e.g., restricting access to only that which is necessary and backing up and archiving data using an external system), and technological tools such as passwords and encryption (e.g., changing passwords often and using firewalls).

ACCESS TO PERSONAL INFORMATION

Only authorized personnel may access your personal information. The company ensures that these people are qualified to access this information and that access is necessary for the performance of their duties.

REQUEST FOR ACCESS TO INFORMATION AND MODIFICATIONS

You have the right to know whether we hold personal information about you and to consult this information. You also have the right to ask questions about how this information was collected and used, and to whom it was disclosed. We will provide you with such information within a reasonable timeframe after receiving your written request. A reasonable fee may also be charged to process your request.

Under certain circumstances, we may refuse to provide you with the requested information. This might be the case if the information requested concerns other individuals; the information cannot be disclosed for legal, security, or copyright reasons; the information was obtained as part of a fraud investigation; the information can only be obtained at unreasonable costs; or the information is the subject of litigation or is privileged in nature.

When we hold medical information about you, we may refuse to provide it directly to you and request that it be sent to the health professional of your choice.

You may verify the accuracy and completeness of your personal information and, if necessary, request that it be modified. All modification requests will be processed within a reasonable time.

Policies and Practices on Personal Information Governance

Requests to access or modify your personal information may be sent to the address below.

Privacy officer:

Nadine Lavoie

prp@stekar.com

418-774-2424, ext. 21

COMPLAINTS AND QUESTIONS

Any complaints or questions concerning the protection of personal information should be sent to the Privacy Officer at the above address.

We will investigate all complaints. If a complaint is found to be justified, we will take appropriate action, including, if necessary, amending our policies and practices.

TRAINING AND AWARENESS

The company promotes best practices and respect for transparency and privacy rights in a number of ways, by:

- Informing all its staff (consent form)
- Making the Privacy Officer's name and contact details available
- Raising awareness in several ways:
 - Information sessions on privacy, reminders at team meetings, training for staff, personal information action plans, logbooks, etc.

ADHERENCE

If for any reason you believe that the company has not properly adhered to these principles, please notify us by contacting our Privacy Officer. We will take the necessary steps to identify and correct the problem within a reasonable timeframe. Mention "Respecting privacy" or "Protection de la vie privée" as the subject of your communication.

POLICY UPDATE

This policy must be reviewed every three years. It should also be updated in the event of any substantial change in statutory or regulatory requirements.

Last update: September 22, 2022