

TELECON – Website Privacy Policy
Last Updated December 21st, 2022.

Telecon Inc. and its affiliates, including Telecon Enterprise, Promark-Telecon and SC360 (“**Telecon**” or “**we**”) respect your privacy and are committed to protecting your personal information. This privacy policy (“**Privacy Policy**”) will inform you as to how we look after your personal information when you visit or use our Websites (the one which you’re currently visiting is referred individually to as the “**Website**” hereafter in this Privacy Policy), regardless of where you visit or use our Website from. This Privacy Policy tells you about your privacy rights and how the law protects you.

By submitting personal information to Telecon or its service providers and agents (collectively referred to as Telecon, “**we**”, “**us**” or “**our**” in this Privacy Policy), you agree that we may collect, use and disclose such personal information in accordance with this Privacy Policy and as permitted or required by law. Subject to legal and contractual requirements, you may refuse or withdraw your consent to our use or disclosure of your personal information at any time by contacting our Senior Director of Legal Affairs, whose contact information is set out in section 1 below. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with services or information which may be of value to you.

Please review this Privacy Policy before using this Website or creating any user account in connection therewith. If you do not agree with this Privacy Policy, do not use the Website nor create any user account. This Privacy Policy governs the use of this Website and applies to any personal information you may submit to this Website. By submitting any personal information to this Website, you agree to be bound by the terms of this Privacy Policy.

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1. INFORMATION ABOUT US

Telecon is a North American telecommunications network infrastructure services provider with headquarters located at 9500, boul. Parkway, Anjou (Québec) H3B 5C9 Canada.

Any questions about:

- access to personal information;
- rectification of personal information;
- our collection, use and disclosure of personal information; or
- this Privacy Policy,

may be directed to our person in charge of the protection of personal information, the Senior Director of Legal Affairs, by email at privacy@telecon.ca or by mail using the address provided above.

2. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

Personal information means any information about an individual from which that person can be identified. It does not include personal information where all references to the identity of the relevant individual have been removed (i.e., anonymous personal information).

We may collect, use, store and transfer the following categories of personal information about you:

- **Identity personal information** includes first name, last name, preferred name, and title.
- **Contact personal information** includes email, address, postal code, and telephone numbers.
- **Technical personal information** includes internet protocol (IP) address and geolocation information, cookies and other technology on the devices you use to access this Website.
- **Internet activity information** includes browsing history, search history, and interactions with our Website and online advertisements.
- **Career profile personal information** includes your online recruitment service password, how you heard about us, who referred you, whether you are a Telecon employee, your work authorization status in Canada, your resume, and other information that you choose to add to your profile.

We do not collect any sensitive personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and health, genetic or biometric information). Nor do we collect any information about criminal convictions and offences.

If you provide Telecon with personal information of another individual, you represent that you have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

3. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We use different methods to collect personal information from and about you including through:

(a) **Direct interactions.**

You may give us your personal information by corresponding with us. This includes personal information you provide when you:

- (i) Sign-up for an online recruitment service user account and update such user account; and
- (ii) Contact us through the form on our Website; and
- (iii) Contact us by any means for any other reason and voluntarily provide us with your personal information.

To access the online recruitment service of the Website, you may be required to create a user account by submitting your email address and to create an online recruitment service password. In submitting personal information on our Website, you are prohibited from impersonating another individual. Any user account must be opened using real names and other requested information.

(b) **Automated technologies or interactions.**

As you interact with our Website, we will automatically collect technical personal information and internet activity information about your equipment and browsing actions and patterns. We collect this information by using cookies, pixels, server logs and other similar technologies. We may also receive technical personal information about you if you visit other websites employing our cookies.

4. WHY DO WE COLLECT AND USE YOUR PERSONAL INFORMATION?

We may use your personal information for the purposes for which it was collected, as set out in this Privacy Policy, for other purposes permitted by law, or for other purposes with your consent.

We may use the information collected for the following purposes:

Purpose	Type of personal information
To provide you with access to our Website and to enhance your convenient use of our Website.	<ul style="list-style-type: none"> • Technical personal information • Internet activity information
Respond to any communication we receive from you.	<ul style="list-style-type: none"> • Identity personal information • Contact personal information

<p>Provide you with access to our online recruitment service and provide you with employment opportunities.</p>	<ul style="list-style-type: none"> • Identity personal information • Contact personal information • Career profile personal information
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5. TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?

Other than as provided below, Telecon does not disclose or sell to third parties personal information you have provided us.

Telecon communicates your personal information to third parties in the following circumstances:

- with our service providers who help us fulfil the purpose for which your personal information was collected, including server hosting providers who help us store the personal information you have provided us;
- with service providers who help us conduct demographic studies of our Website visitors and job applicants;
- to comply with our obligations under any law or regulation, investigation, subpoena or order of a court, tribunal or other administrative or governmental authority;
- with law enforcement or a government institution in order to investigate fraud or potential fraud, as well as any other violation of a law, regulation, or the terms and conditions of use of the Website, and/or in order to protect the rights, property, or safety of Telecon, our customers/users, or our partners; and
- with an acquiring organization in the event of a proposed or actual purchase (including liquidation, realization, seizure, or repossession), concession, merger, business combination, or any other type of acquisition, liquidation, transfer, translational contract, or financing of Telecon in whole or in part or of any property, share, assets, stock, or business of Telecon.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

By providing us with personal information, you acknowledge and agree that your personal information may be transferred to other jurisdictions for processing and storage, including in servers located across Canada and in the United States, where laws regarding the protection of personal information may be less stringent than the laws in your jurisdiction. Further, your personal information may be accessible to law enforcement, national security authorities, and the courts of such jurisdictions. If you are from Quebec, such other jurisdictions may include Canadian

provinces or territories other than Quebec. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the personal information. If you have any questions regarding our policies and practices relating to our storage and processing of personal information in other jurisdictions, please contact our Senior Director of Legal Affairs whose contact information is set out in section 1 above.

7. PROTECTION OF YOUR PERSONAL INFORMATION

To help protect the confidentiality of your personal information, we employ administrative and technological safeguards appropriate to the sensitivity of your personal information. Where personal information is sent to a third party for processing, we obtain a commitment from such third party, that all user information is subject to adequate security safeguards and will not be used for any purpose other than to provide services on our behalf. We operate secure data networks protected by password protection systems.

8. HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?

Telecon only keeps personal information for as long as necessary and for the reasons it was collected, or for as long as required to comply with any applicable legal obligation. The length of time personal information is kept varies according to the nature of the information, and it may extend beyond the end of the relationship between an individual and Telecon.

When the personal information collected is no longer required by Telecon, the necessary procedures for destroying, deleting, erasing, or converting it into an anonymous form are applied.

In some circumstances, we will anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. PROTECTION OF CHILDREN'S PERSONAL INFORMATION

The protection of children's personal information is extremely important. Telecon understands that it has a responsibility to protect the privacy of children and has no intention of collecting the personal information of children under the age of 14.

This Website and the online recruitment service are directed to, and meant to be used by, adults. We do not knowingly collect any information from persons under the age of 14. If we become aware that we have collected any personal information from a child under the age of 14, we will delete that information. We ask parents and other guardians to monitor their children's Internet usage in order to protect them.

10. YOUR LEGAL RIGHTS

Subject to certain exemptions, as permitted by law, you have the following rights in relation to the personal information we hold about you:

- (a) Your right of access

You have the right to access the personal information we hold about you and to receive a general account of our uses of that personal information. Upon receipt of a written request from you, we

will provide you with a copy of your personal information, although in certain limited circumstances, we may not be able to make all relevant personal information available to you, for example, where that personal information also relates to another individual. In such circumstances, we will, upon request, provide you with the reasons for such refusal. We will endeavour to deal with all requests for access of personal information in a timely manner.

(b) Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. Where appropriate, such amended personal information will be provided to the parties to whom we are authorized to disclose your personal information. We will endeavour to deal with all requests for rectification of personal information in a timely manner.

If you have any inquiries regarding your rights described in this section, you may contact our Senior Director of Legal Affairs whose contact information is set out in section 1 above.

(c) Your right to erasure

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need your information to fulfill the purposes for which it was collected, or if you withdraw your consent (where applicable because your consent was the legal basis on which we were processing your personal information). If you are entitled to erasure and if we have shared your personal information with others, we will take reasonable steps to inform those others where possible and where this would not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do so, we will also inform you about who we have shared your personal information with so that you may contact them directly.

(d) Your right to personal information portability

You may have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used, and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

(e) Your right to withdraw consent

If we rely on your implicit or explicit consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdrew your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

11. LINKS TO OTHER WEBSITES AND ADVERTISING

This Website may occasionally contain links to other sites not operated by Telecon. Telecon is not responsible for the privacy practices or the content of those web sites. Please be sure to review the privacy policies of those sites.

This Website may display advertisements and/or links to third party sites. These advertisements or links may contain cookies placed by those third parties. Telecon is not responsible for those advertisements, the web sites to which they are linked, or how any other linked sites, may use their own cookies or information. For example, cookies received with banner ads may be collected by the company posting the ad on our Website. Please refer to that company's privacy policy for further information.

12. CHANGES TO THIS PRIVACY POLICY

Telecon may review its privacy practices and this Privacy Policy. Such changes will appear on this page, and the date of the last update will also appear on this page. Your continued use of our Website following any such changes constitutes your acceptance of and agreement to be bound by such changes. Please review this Privacy Policy periodically to see any changes to our Privacy Policy.