# SATAU

## PRIVACY AND PERSONAL INFORMATION PROTECTION POLICY

At Satau Inc., we attach great importance to the protection of the personal information of our customers, employees and representatives. In accordance with the Act respecting the protection of personal information in the private sector, we are committed to preserving the confidentiality of personal information collected in the course of our activities. The purpose of our privacy policy is to inform you about our practices for collecting, using, disclosing, retaining and protecting your personal information. By providing us with your personal information, you accept the terms of this policy and authorize us to process your information in accordance with it.

## **1. CONSENT**

## 1.1 Commitment to Privacy

We are committed to protecting the privacy of our users. We collect and use personal information only with their explicit consent and in compliance with applicable laws.

## 1.2 Acceptance of Our Policy's Terms and Conditions

By accessing our website www.satau.ca or providing us with personal information, you agree to the terms of our privacy policy. This includes your consent to the collection and use of your personal information in accordance with this policy.

### 1.3 Right to Withdraw Consent

You have the right to withdraw your consent at any time. However, this is subject to certain legal or contractual restrictions. We will inform you of the possible consequences of this withdrawal, such as the inability to provide certain products or process certain requests. Your decision to withdraw will be recorded in our records.

### 1.4 Exceptions to the Need for Consent

In certain exceptional circumstances, we may collect, use or disclose personal information without first obtaining your consent. This may occur in situations where legal, medical or security requirements make obtaining your consent impossible or impractical. These situations include, but are not limited to, suspected breach of contract, fraud prevention or detection, or law enforcement needs.

## 2. COLLECTION OF PERSONAL INFORMATION

### 2.1 We collect personal information through a variety of means, such as:

- Emails and communications with our customer service
- Online request forms (including appointments)
- Cookies and similar technologies on our website

### 2.2 We may also collect information from third parties, such as:

- A technology service provider such as an ordering platform or newsletter service.
- A recruitment portal that allows candidates to submit their CV and personal data.
- Professional social networks such as LinkedIn for recruitment or marketing purposes.
- A consultant who provides part of the services we offer to our customers.
- A cloud computing company storing customer data.
- A digital marketing company analyzing user behaviour on our website.
- A logistics provider managing the delivery of products and collecting information about recipients.

## **3. TYPES OF PERSONAL INFORMATION COLLECTED**

3.1 We collect various types of data, including but not limited to:

- Personal Identifiers (name, postal address, email, telephone number)
- Technical or Digital Information (IP address, online activities)
- **Demographic Data** (age, ethnicity, nationality, place of residence)

### 3.2 Children's Privacy

We do not knowingly collect or solicit personal information from children under the age of 13. By using our website, you represent that you are at least 13 years old. If you are under 13, please do not attempt to send us any personal information. If we discover that we have inadvertently collected personal information from a user under the age of 13, we will attempt to immediately delete that information from our files and records. We also encourage minor users of the website aged 13 or older to ask their parents or guardians for permission before sending any information about themselves over the Internet.

If you think that a child under 13 has provided us with personal information, please contact us using the contact information provided in the following section.

## 4. USE OF PERSONAL INFORMATION

4.1 We use your personal information for a range of essential activities:

- **Responses to Requests**: To effectively respond to your requests and queries.
- **Transaction Management**: Processing payments and issuing receipts for transactions made.
- **Registrations & Participation**: Managing your registrations for events, training courses, newsletters, downloads from our website, or participation in webinars.
- Human Resources Management: For internal management and administration of human resources, recruitment, employment contracts and service agreements.
- **Improving User Experience**: Operating, maintaining and improving our website, personalizing your online experience, and providing requested services and information.
- **Marketing Communication**: Sending you relevant information, special offers and news, with the option to unsubscribe at any time.

These uses are intended to enrich your experience with our services and to facilitate effective interaction with our organization.

## 4.2 We offer a variety of options to allow you to control and limit the collection of your personal information. These options include:

- **Communication Choices**: You can choose to receive our communications by different means (phone, SMS, email), or refuse them completely.
- **Cookie Management**: Our site allows you to refuse or customize the use of cookies. Please note that blocking certain cookies may affect the accessibility and functionality of our site.
- **Granular Consent**: In most situations, when we collect information for specific purposes, you have the option to consent only to certain uses of your data.

It is important to note that some of these options may limit your access to all of the features of our Service. For example, by refusing certain cookies, some parts of our website may not function as intended.

You can set your browser to refuse cookies or to notify you when a cookie is being sent. However, please note that some parts of our website may not function properly if you refuse cookies.

### 4.3 Use of Cookies & Google Analytics

We use tracking technologies such as cookies, beacons, and scripts to improve and analyze our website. We use both session and persistent cookies for a variety of reasons, including to provide services available through the website, to authenticate users, to personalize the user experience, and to track traffic and usage information on the website.

Some cookies are essential to provide requested services and to prevent fraudulent use of user accounts. We also use persistent cookies to remember user choices, such as logins and language preferences, to enhance the user experience.

We also use persistent tracking and performance cookies to track traffic information on the website and to test new pages, features, or functionality of the website to see how users respond. These cookies may be administered by third parties and may directly or indirectly identify you as an individual visitor.

### 4.3.1 Analytical Data

We may use third parties, such as Google Analytics, to help us collect and analyze information about the sections visited on the website in order to evaluate and improve the user experience and the website. These third parties may use cookies and other tracking technologies. If you wish to prevent the storage and processing of this data (including your IP address) by Google, you can download and install the browser plug-in available at the following link: <u>Google</u> <u>Analytics Opt-out Browser Add-on</u>

You can also read the Google Analytics privacy policy by clicking the following link: <u>Privacy</u> <u>Policy & Terms of Use – Google</u>

#### 4.3.2 Conversion Pixels

Conversion pixels, also known as "clear GIFs" or "tracking pixels," are tiny images, usually a single pixel, that may be placed on a web page or in an email to tell us when you viewed that page or opened that email and to analyze response rates.

## 5. SHARING AND DISCLOSURE OF PERSONAL INFORMATION

5.1 Personal information collected by our organization is accessible to specific categories of our personnel and certain partner organizations, for the purpose of providing our products and services effectively. For example:

- **Customer Service**: Access contact information to respond to requests.
- IT Department: Access technical data for support and maintenance.
- Marketing Department: Use data for advertising campaigns and market research.
- Shipping Partners: Receive addresses for order delivery.
- Payment Service Providers: Access financial information for transaction processing.
- **Privacy and Data Security Officers**: Access information to ensure data security and protection from unauthorized access or cyberattacks.
- Legal Consultants: Use data to ensure compliance with applicable laws and regulations.
- **Cloud Service Providers**: Host data on secure servers, allowing for storage and retrieval of information.
- **Research and development partners**: Access certain data to collaborate on new product/service innovations or improvements.
- **Collection agencies**: In cases of non-payment, certain information may be shared with external collection agencies.

We ensure that this information is used exclusively for the stated purposes and in compliance with confidentiality. Data transfers outside Quebec are carried out within the framework of international collaborations, while ensuring adequate protection of the information in accordance with the laws in force.

### 5.2 Disclosure of Your Personal Information

Your data, including personal data, is processed at our operational offices and in any other places where the parties involved in the processing (such as our service providers) are located. This means that this information may be transferred to computers located outside of your state, province, country or other governmental authority where the data protection laws may differ than those from your jurisdiction. Therefore, in certain circumstances, foreign governments, courts, law enforcement or regulatory agencies may be entitled to access personal data collected and held under our control.

By using our website, you consent to this transfer. We will take all steps necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy. No transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your personal data and other personal information.

Each employee, director, volunteer, independent contractor or ad hoc advisor serving on our board committees agrees to respect the personal information we collect. In addition, these individuals agree to maintain the confidentiality of information specific to our activities and not to disclose or use it for personal or other benefit. This commitment exists from the time the employee, director, volunteer, independent contractor or ad hoc advisor takes office and continues indefinitely.

### 5.3 Sale or Transfer of Business or Assets

When a business is sold or transferred, your personal data may also be transferred to the acquirer or transferee of assets. If this happens, Satau Inc. will require the acquirer to use your personal data in accordance with this Privacy Policy. This includes the use of your personal data only by the acquirer and its affiliates. If we are involved in a reorganization, dissolution or liquidation, this may also result in the transfer of your personal data to a third party. In all cases, we will endeavour to protect your personal data and notify you of any transfer to the extent required by applicable law.

## 6. LINKS TO OTHER WEBSITES

### 6.1 Our website may contain links to third-party websites

When you follow these links, you leave our website. The information exchanged at that time is no longer subject to our privacy policy. We recommend that you read the privacy statements of the other websites you visit before providing any information.

## 7. SECURITY OF PERSONAL INFORMATION

### 7.1 Security Measures for Protection of Personal Information

To ensure the security and confidentiality of personal information, Satau Inc. adopts rigorous security measures, including both physical and technological aspects. Here are some concrete examples:

- **Physical security**: Using electronic locking systems and security locks to access desks, cabinets and filing cabinets, installing surveillance cameras, and restricting access to areas where personal data is stored.
- Access controls: Limiting access to personal data to authorized employees only.
- Staff training: Regularly educating staff on data security best practices.
- Data encryption: Protecting sensitive data using advanced encryption techniques.
- Intrusion detection and monitoring: Implementing systems to monitor suspicious activity and detect potential intrusions.
- **Disaster recovery plans**: Developing plans to quickly restore data in the event of an incident such as a power outage or cyber attack.

These measures are designed to protect personal information from unauthorized access, use or disclosure, and to maximize its integrity and confidentiality. Although we do our utmost to protect your personal data, it is important to remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. We cannot guarantee its absolute security.

## 7.2 Staff & Board Engagement

Each employee, director, volunteer, independent contractor or ad hoc advisor serving on our board committees agrees to respect the personal information we collect. In addition, these individuals agree to maintain the confidentiality of information specific to our activities and not to disclose or use it for personal or other benefit. This commitment exists from the time the employee, director, volunteer, independent contractor or ad hoc advisor takes office and continues indefinitely.

# 8. RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

We will only retain your personal data for as long as is necessary for the purposes set out in this privacy policy. We will retain and use it to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal policies.

We will also retain usage data for internal analysis purposes. This data is generally retained for a shorter period of time, unless it is used to strengthen the security or improve the functionality of our website, or we are legally obligated to retain it for longer periods.

## 9. YOUR RIGHTS

### 9.1 Recognition & Respect of Your Rights

As part of our privacy policy, we recognize and respect the fundamental rights of individuals whose personal information we hold is affected by it. These rights include:

- **Right of access**: Individuals have the right to review the personal information we hold about them. For example, a customer may request to see the data collected when they sign up for our service.
- **Right to rectification**: If information is inaccurate or incomplete, individuals may request that it be updated. For example, an employee may request that their incorrect postal address be corrected in our records.
- **Right to de-indexation**: Individuals may request that their personal information be removed from distribution, or that any hyperlink associated with their name be de-indexed, if such distribution causes them harm or is in violation of the law or a court order. This right to erasure or to be forgotten allows individuals to control the availability of their personal information on the internet.

• **Right to lodge a complaint**: If individuals have concerns about the processing of their data, they may lodge a complaint in accordance with our established process.

Subject to applicable laws, upon receipt of a written request from an individual and verification of their identity, we will inform the individual whether we hold personal information about them and provide them with that information.

We may refuse an individual access to their information in accordance with applicable laws, in which case we will provide reasons for our refusal.

To facilitate these rights, contact information for our Privacy Officer is clearly indicated for any questions or concerns. These measures ensure that individuals can exercise their rights with confidence and transparency.

## **10. POLICY CHANGES**

This policy may be updated to reflect changes in our practices or legal requirements. Changes will be posted on our website. We encourage you to review this privacy policy periodically to stay informed of any changes.

## **11. CONTACT**

## Any requests or questions regarding this privacy policy may be sent to the person responsible for the protection of personal information at the following address:

- By email: <u>aide@satau.ca</u>
- By mail: 71, boulevard Brunswick, Dollard-des-Ormeaux, QC H9B 2N4

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