



DYNACOR GROUP INC.

CONFIDENTIALITY POLICY

(UPDATED SEPTEMBER 2023)

1. DYNACOR'S COMMITMENT RELATING TO THE PROTECTION OF YOUR PERSONAL INFORMATION

Dynacor Group inc. (hereinafter "**Dynacor**") or "**we**" or "**us**") is responsible for the protection of the personal information it holds about you, whether its conservation is ensured by Dynacor or by a third party and whatever its form (written, graphic, audio, visual, computerized or other).

As such, Dynacor takes the necessary security measures to protect your personal information in a manner proportional to its sensitivity, the purpose of its use, its quantity, its distribution as well as the type of support on which it is stored. In accordance with applicable law, Dynacor adopts this confidentiality policy (hereinafter, the "**Policy**").

2. CONSENT

By visiting or using the Dynacor website (the "**Site**"), or otherwise communicating with us, you agree to be bound by this Policy and you consent to your personal information being collected, used, disclosed, preserved, destroyed or anonymized in accordance with the terms described in the Policy.

You understand that certain features of our Site may no longer be accessible or will be restricted following your refusal or withdrawal of your consent relating to this Policy.

Dynacor does not collect any personal information from people under the age of 14 without the explicit and verified consent of the holder of parental authority.

3. TO WHOM DOES THE POLICY APPLY?

This Policy applies to all personal information about individuals who visit, use the Site or otherwise provide their information to Dynacor. It therefore also applies to all directors, officers, employees, consultants and representatives of Dynacor.

4. INFORMATION WE COLLECT

Personal information is defined as any information that concerns a natural person and allows, directly or indirectly, to identify them. By visiting or using the Site or otherwise communicating with us, Dynacor may collect certain personal information, including:

- first and last name;
- contact details such as address, email address or telephone number;
- copies of identity documents for verification purposes with official authorities for internal purposes and employment at Dynacor;
- the information included on your resume submitted to Dynacor or on any other employment platform;
- identification and financial data for employment purposes including income, tax information, bank account number, SIN;
- browsing data, including IP address, date and duration of visit, number of visits and pages viewed;
- your communications preferences or other information relating to marketing, such as subscription to a newsletter, comments, responses to surveys if applicable.

5. COOKIES (“COOKIES”)

Dynacor reserves the right to use cookie file technology (the “**cookies**”) in order to improve the quality of your visit to the Site. A cookie is a tiny database that some sites save on your hard drive when you visit them. A cookie contains several types of information, including a username that the site uses to track the pages you have visited. A cookie can only be read by the website that transmits it to your computer.

6. ACCURACY OF PERSONAL INFORMATION

Dynacor undertakes to maintain, where applicable, the accuracy of your personal information and ensures that it is complete and up to date. If your information changes, please notify us immediately so that we can make the necessary changes.

7. ACCESSIBILITY AND CORRECTION

To have access to personal information, obtain a copy of it or have certain personal information that we hold about you that is inaccurate modified, you can request it from us in writing. You can also ask how this information is used and ensure that it is accurate and complete, and update it as necessary, to the extent permitted by law.

8. DETERMINATION OF THE PURPOSES OF THE COLLECTION

We ask you for personal information for specific purposes, including:

- establish your identity and carry out verifications with official authorities, such as embassies, consulates for internal purposes or employment at Dynacor;
- communicate with you;
- for its internal needs, including obtaining applications, recording, analyzing and evaluating applications as well as for the needs required by your employment or your position at Dynacor including payroll and group insurance;
- obtain services on behalf of Dynacor, including hotel reservations, registration for courses or training or other services for certain employees as part of their duties, if applicable;
- produce statistics and accounting and budgetary analyses;
- for training purposes;
- send a newsletter;
- improve the Site and better meet your needs;
- collaborate with regulatory bodies;
- meet the requirements of legislation regarding the protection of personal information.

9. SECURITY MEASURES

Dynacor applies very strict security measures to protect your personal information against unauthorized access, use, communication, modification, loss, theft, or any other breach of information security. The information collected is protected by reasonable computer security measures given its sensitivity.

Physical and material security measures include:

- offices with controlled access and locked filing cabinets;
- restricted access to your personal information to a selected group of people;
- employee cybersecurity training;
- written contractual obligations with third parties who must have access to your personal information, requiring them to protect, through security measures, the confidentiality and security of your personal information and to use it only for the purposes of the contract, of the mandate or service they perform.

IT security measures include:

- the use of passwords;
- two-factor authentication (2FA), depending on the context;
- the use of firewalls and antiviruses;
- a data backup system;

- regular updates of operating systems and software;
- a regular review of our security practices;
- a regular upgrade of our technological system.

If the purposes for which the information was collected are fulfilled, Dynacor will securely destroy it or anonymize it in the manner permitted by law to use the anonymized information for serious and legitimate purposes.

10. COMMUNICATION TO THIRD PARTIES

The personal information collected is accessible only to our managers and employees who must access it to make the use provided for by this Policy and with which they must comply or, to third parties within the framework of a service or business contract or restricted mandate.

In such cases, as previously stated, we implement written contractual obligations with third parties to ensure the protection of your personal information.

Furthermore, Dynacor reserves the right to use or disclose personal information if it believes that such use or disclosure is required to comply with its legal obligations, to safeguard its rights, to comply with any order or request of a competent court, or for any other reason provided for by law authorizing or requiring the disclosure of personal information.

Your personal information may be accessible or retained by our business partners outside of Quebec. Before communicating your personal information outside of Quebec when necessary, we will carry out an assessment of the factors relating to privacy in order to ensure equivalent protection of your personal information.

11. WITHDRAWAL OF CONSENT

You can modify or withdraw your consent to the collection, use and communication of personal information concerning you at any time by sending a written notice to the person responsible for access and protection of personal information (the "Responsible for PRP"). You understand that certain features may no longer be accessible or will be restricted following the withdrawal of your consent relating to this Policy.

12. OCCASIONAL CHANGES TO THE POLICY

Dynacor reserves the right to make changes to the Policy at any time by notifying its users on this page and/or by sending notice to affected individuals through any contact information available to us. It is recommended to consult this page regularly, referring to the date of the last modification. If the changes affect the original consent, Dynacor will collect your consent again, if applicable.

13. CONTACT INFORMATION, COMPLAINTS AND HANDLING THEREOF

Any person concerned by personal information collected, used, communicated or stored by Dynacor may file a complaint with the PRP Manager. The complaint must indicate the nature of the alleged facts, the date on which the incident occurred, as well as the expectations regarding the outcome of the complaint. The PRP Manager acknowledges receipt of the complaint and processes it within a maximum of twenty (20) days.

Dynacor reviews all privacy-related complaints and takes appropriate action to resolve them. For any additional information regarding how we process personal information, please contact the PRP Manager at:

PRP@dynacor.com

Jean Martineau, CEO

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