

# **Privacy Practices Framework**

Last updated: November 4, 2025

## Introduction

This Privacy Policy (the "Privacy Policy") outlines the measures implemented by Construction Bon-Air Inc. to protect the personal information of clients and staff, referred to as "User."

The purpose of this Privacy Policy is to inform any User about the nature of personal information that may be collected and used by Construction Bon-Air Inc. or third parties, as well as information that may be disclosed to authorized third parties in specific cases, if applicable.

WITHOUT LIMITING THE GENERALITY OF THE ABOVE, THE USER CONSENTS TO CONSTRUCTION BON-AIR INC. COLLECTING, USING, PROCESSING, AND DISCLOSING THEIR PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY.

Construction Bon-Air Inc. reserves the right to revise the terms of this Privacy Policy at any time without notice. Use of a website and/or our services after a modified version of the Privacy Policy has been posted will constitute acceptance of the changes made. You are therefore encouraged to review this Privacy Policy periodically.

This Privacy Policy and its interpretation, enforcement, validity, and effects are subject to applicable provincial and federal laws in the province of Quebec (Canada), where applicable.

#### 1. Collection

"Personal information" generally refers to any data that can identify an individual. The personal information that Construction Bon-Air Inc. may collect, use, and disclose through its subcontractors, suppliers, insurers, or others in the course of business may include name, age, gender, mailing address, phone number, email address, etc. Sensitive personal information is collected only when necessary. For the purposes of this Policy, "sensitive personal information" refers to any data that, due to its nature (e.g., medical, biometric, or otherwise intimate), or the context of its use or disclosure, carries a high expectation of privacy.

## 2. Consent

Before collecting your personal information, Construction Bon-Air Inc. will take all necessary steps to obtain your express consent.

Generally, Construction Bon-Air Inc. explicitly requests the User's consent before collecting personal information. Users may withdraw this consent, subject to legal restrictions and exemptions, by providing reasonable written notice to the Privacy Officer at the contact information provided.



#### 3. Circumstances of Collection

Personal information may be requested or voluntarily provided by the User in the following contexts:

- To enable product purchases in-store or subcontracting services
- To open a client or employee file
- To voluntarily participate in a customer satisfaction survey
- To respond to general inquiries

This information may occasionally be shared with third parties, including CNESST services, various union associations, etc.

#### 4. Use and Disclosure

Generally, Construction Bon-Air Inc. uses personal information for internal purposes only. However, it may disclose personal information to:

- External service providers under contractual agreement
- Relevant insurers
- Employer associations
- Third parties when required by law

#### 5. Protection Measures

Construction Bon-Air Inc. takes appropriate measures to protect Users' personal information from unauthorized access, use, or reproduction. These measures may include secure transaction programs and physical safeguards to restrict access to offices and files containing personal information collected via its websites.

## 6. Modification of Personal Information

Construction Bon-Air Inc. takes all reasonable steps to ensure that collected personal information remains accurate, complete, and up to date, and relies on the User to notify of any changes.

#### 7. Communication

Any User who has provided personal information to Construction Bon-Air Inc. has the right to consult, correct, extract, update their personal data, request cessation of its dissemination if it causes serious harm, or obtain information about data processing by submitting a written request to the Privacy Officer identified in this Policy. Construction Bon-Air Inc. will respond diligently and provide access to the collected information in a structured and commonly used technological format, if applicable.



#### 8. Retention

Construction Bon-Air Inc. may retain a file containing collected personal information about a User. This information is used, disclosed, or retained as long as necessary. The company will establish retention periods and procedures for secure destruction or anonymization of personal data, ensuring confidentiality and compliance with applicable laws.

# 9. Privacy Incidents

Construction Bon-Air Inc. maintains a record of any known security incidents, as defined in the Act Respecting the Protection of Personal Information in the Private Sector (RLRQ c P-39.1), that may affect the security or confidentiality of your personal information. If an incident poses a serious risk of harm, Construction Bon-Air Inc. will take necessary steps to notify you, subject to applicable legal provisions.

#### 10. Contact

Files containing personal information about a User are usually stored at the head office of Construction Bon-Air Inc. For any complaint or question regarding personal information or the application and interpretation of this statement, you may contact the Privacy Officer at:

Attn: Sabrina Roy, Privacy Officer

Construction Cree-Air Inc.

216 RD Industrial

Mistissini (Quebec) G0W1C0

Email: sroy@creeair.com