

Privacy Policy and Confidentiality Policy

Effective Date: January 1, 2023

1. Context

ndb Technologies is a company committed to protecting personal information in the course of its activities. This policy aims to inform our clients, partners, members, and anyone interested in how ndb Technologies collects, uses, communicates, stores, and manages personal information. It also applies to the use of technological means for the processing of personal information.

2. Application and Definitions

This policy applies to ndb Technologies, including its executives, employees, consultants, volunteers, and anyone else providing services on behalf of ndb Technologies. It also applies to ndb Technologies' website and all websites controlled and maintained by ndb Technologies.

It encompasses all types of personal information managed by ndb Technologies, including information about its clients, potential or current, consultants, employees, members, or any other individuals (such as visitors to its websites).

For the purposes of this policy, personal information is information about an identifiable individual. For example, this could include a person's name, address, email address, phone number, gender, or banking information, as well as information about their health, ethnic origin, language, etc.

Sensitive personal information is information for which there is a high degree of reasonable privacy expectation. Examples include health information, banking information, biometric information, sexual orientation, ethnic origin, political opinions, religious or philosophical beliefs, etc.

In general, professional or business contact information, such as a person's name, title, address, email address, or work phone number, does not constitute personal information. Specifically, as of September 22, 2023, and in accordance with the Private Sector Privacy Act of Quebec, sections 3 (collection, use, disclosure), 4 (retention and disposal), and 6 (data security) do not apply to a person's information related to their role in a company, such as their name, title, function, as well as the address, email address, and phone number of their workplace. These same sections also do not apply to personal information that is publicly available under the law, starting from the effective date of this policy.

3. Collection, Use, and Disclosure

In the course of its activities, ndb Technologies may collect various types of information for different purposes. The types of information ndb Technologies may collect, their use (or intended purpose), and the means by which the information is collected are outlined in Annex A of this policy.

ndb Technologies will also inform individuals, at the time of the collection of personal information, of any other information collected, the purposes for which they are collected, and the means of collection, in addition to other required information as mandated by law.

ndb Technologies adheres to the following general principles regarding the collection, use, and disclosure of personal information:

Consent

Generally, ndb Technologies collects personal information directly from the individual concerned and with their consent unless an exception is provided by law. Consent may be obtained implicitly in certain situations, for example, when the individual decides to provide their personal information after being informed by this policy about the use and disclosure purposes. Thus, this policy and the information it contains can be accessed by the individual concerned at the time of the collection of personal information.

Normally, ndb Technologies must also obtain the consent of the individual concerned before collecting their personal information from third parties, before disclosing it to third parties, or for any secondary use. However, ndb Technologies may act without consent in certain cases provided by law and under the conditions specified by it. The main situations where ndb Technologies may act without consent are indicated in the relevant sections of this policy.

Collection

In all cases, ndb Technologies only collects information if there is a valid reason to do so. Additionally, the collection will be limited to the necessary information needed to fulfill the intended purpose.

Please note that ndb Technologies' services and programs are not intended for minors, and in general, ndb Technologies does not intentionally collect personal information about minors (in these cases, information cannot be collected from them without the consent of a parent or guardian).

Retention and Use

ndb Technologies ensures that the information it holds is up-to-date and accurate at the time of use for a decision concerning the individual. ndb Technologies can only use a person's personal information for the reasons stated herein or for any other reasons provided at the time of

collection. When ndb Technologies wants to use this information for another reason or purpose, new consent must be obtained from the individual concerned, which must be obtained expressly if it is sensitive personal information. However, in certain cases provided by law, ndb Technologies may use the information for secondary purposes without the consent of the individual, e.g.:

- When such use is clearly to the benefit of the individual;
- When necessary to prevent or detect fraud;
- When necessary to assess or improve protection and security measures.

Limited Access:

ndb Technologies must implement measures to limit access to personal information only to employees and individuals within its organization who have the authority to access it and for whom this information is necessary in the performance of their duties. ndb Technologies will seek the consent of the individual before granting access to any other person.

Communication

Generally, and unless an exception is stated in this policy or otherwise provided by law, ndb Technologies will obtain the consent of the individual concerned before disclosing their personal information to a third party. Moreover, when consent is required and when it involves sensitive personal information, ndb Technologies must obtain the explicit consent of the individual before disclosing the information.

However, the disclosure of personal information to third parties is sometimes necessary. Thus, personal information may be disclosed to third parties without the consent of the individual concerned in certain cases, including, but not exclusively, in the following cases:

ndb Technologies may disclose personal information, without the consent of the individual concerned, to a public body (such as the government) that, through one of its representatives, collects it in the exercise of its powers or the implementation of a program it manages.

Personal information may be transmitted to service providers to whom it is necessary to communicate the information, without the consent of the individual. For example, these service providers may be event organizers, subcontractors of ndb Technologies designated to perform mandates in programs administered by ndb Technologies, and cloud service providers. In these cases, ndb Technologies must have written contracts with these providers indicating the measures they must take to ensure the confidentiality of the communicated personal information, that the use of this information is only for the execution of the contract, and that they cannot retain this information after its expiration. In addition, these contracts must provide that the providers must notify ndb Technologies' privacy officer (indicated in this policy) of any breach or attempted breach of confidentiality obligations regarding the communicated personal information and allow this officer to conduct any verification regarding this confidentiality.

If necessary for the conclusion of a business transaction, ndb Technologies may also disclose personal information, without the consent of the individual concerned, to the other party to the transaction and subject to the conditions provided by law.

Communication Outside Quebec

Personal information held by ndb Technologies may be communicated outside Quebec, for example, when it uses cloud service providers whose servers are located outside Quebec or when it deals with subcontractors located outside the province.

Additional Information on Technologies Used:

Use of Cookies

Cookies are data files transmitted to the visitor's computer by their web browser when they visit a website and can serve various purposes. Websites controlled by ndb Technologies use cookies, including :

- To remember visitor settings and preferences, such as language choice and to enable tracking of the current session.
- For statistical purposes to understand visitor behavior, the content viewed, and to improve the website.

The websites controlled by ndb Technologies use the following types of cookies:

- Session cookies: These are temporary cookies that are stored for the duration of the website visit only.
- Persistent cookies: They are stored on the computer until they expire and will be retrieved during the next website visit.

Some cookies may be disabled by default, and visitors can choose to activate or deactivate these functions when visiting ndb Technologies' websites. It is also possible to enable or disable the use of cookies by changing preferences in the browser settings.

Use of Google Analytics

Certain ndb Technologies sites (including <https://www.ndbtech.com>) use Google Analytics for continuous improvement. Google Analytics allows for the analysis of how a visitor interacts with an ndb Technologies website. Google Analytics uses cookies to generate statistical reports on visitor behavior on these websites and the content viewed.

Information from Google Analytics will never be shared by ndb Technologies with third parties. A browser add-on can be installed to disable Google Analytics.

Other Technological Means Used

ndb Technologies also collects personal information through technological means such as web forms integrated into a website controlled by ndb Technologies (e.g., its contact form, membership application form, newsletter and seminar registration form), online surveys on its platforms and

applications, as well as other form platforms or tools (e.g. Microsoft Forms). If ndb Technologies collects personal information by offering a technological product or service with privacy settings, it must ensure that these settings offer the highest level of privacy by default (cookies are not covered).

4. Retention and Destruction of Personal Information

Unless a minimum retention period is required by applicable law or regulation, ndb Technologies will only retain personal information for the duration necessary to achieve the purposes for which it was collected.

Personal information used by ndb Technologies to make a decision about an individual must be retained for at least one year following the decision in question or even seven years after the end of the fiscal year in which the decision was made if it has tax implications, for example, in the case of termination of employment.

At the end of the retention period or when personal information is no longer necessary, ndb Technologies will ensure:

- To destroy it; or
- To anonymize it (i.e., it no longer allows, irreversibly, the identification of the person and it is no longer possible to establish a link between the person and the personal information) for use for serious and legitimate purposes.

The destruction of information by ndb Technologies must be done securely to ensure the protection of this information.

This section may be supplemented by any policy or procedure adopted by ndb Technologies regarding the retention and destruction of personal information, if applicable. Please contact ndb Technologies' privacy officer (indicated in this policy) for more information.

5. Responsibilities of ndb Technologies

In general, ndb Technologies is responsible for the protection of the personal information it holds. The privacy officer of ndb Technologies is the director of operations of the organization. He or she must ensure compliance with applicable legislation concerning the protection of personal information. The privacy officer must also approve policies and practices governing the governance of personal information. Specifically, this person is responsible for implementing this policy and ensuring that it is known, understood, and applied. In the absence or incapacity of the privacy officer, the president of ndb Technologies will assume the responsibilities of the privacy officer. ndb Technologies' staff members who have access to personal information or are otherwise involved in its management must ensure its protection and comply with this policy.

Roles and responsibilities of ndb Technologies employees throughout the life cycle of personal information may be specified by any other ndb Technologies policy in this regard, if applicable.

6. Data Security

ndb Technologies is committed to implementing reasonable security measures to ensure the protection of the personal information it manages. These security measures are determined based on the purpose, quantity, distribution, medium, and sensitivity of the information. Thus, information considered sensitive (see definition in section 2) will be subject to stricter security measures and will benefit from enhanced protection. In accordance with what was mentioned earlier regarding restricted access to personal information, ndb Technologies must implement the necessary measures to impose restrictions on the rights to use its information systems, allowing access only to authorized employees.

7. Rights of Access, Rectification, and Withdrawal of Consent

To exercise their rights of access, rectification, or withdrawal of consent, the individual concerned must submit a written request to the privacy officer of ndb Technologies at the email address indicated in the following section.

Subject to certain legal restrictions, individuals concerned can request access to their personal information held by ndb Technologies and request its correction in case of inaccuracy, omission, or ambiguity. They can also demand the cessation of the dissemination of personal information about them or that any hyperlink associated with their name allowing access to this information by technological means be de-indexed when the dissemination of this information contravenes the law or a court order. They can do the same, or demand that the hyperlink allowing access to this information be re-indexed, when certain conditions provided by law are met.

The privacy officer of ndb Technologies must respond in writing to these requests within 30 days of receiving the request. Any refusal must be justified and accompanied by the legal provision justifying the refusal. In these cases, the response must indicate the remedies available under the law and the time frame for exercising them. The officer must help the requester understand the refusal if necessary.

Subject to applicable legal and contractual restrictions, individuals may withdraw their consent for the communication or use of the collected information. They may also request from ndb Technologies details on the personal information collected from them, the categories of individuals within ndb Technologies who have access to it, and the duration of its retention.

8. Complaint Handling Process

Reception

Anyone wishing to file a complaint regarding the application of this policy or, more broadly, the protection of their personal information by ndb Technologies, must do so in writing by addressing the Personal Information Protection Officer at ndb Technologies, at the email address provided in the following section. The individual should include their name, contact information, including a telephone number, the subject, and the reasons for their complaint, providing sufficient details for it to be evaluated by ndb Technologies. If the filed complaint is not sufficiently precise, the Personal Information Protection Officer may request any additional information deemed necessary to assess the complaint.

Processing

ndb Technologies is committed to handling all received complaints confidentially. Within 30 days of receiving the complaint or receiving all additional information deemed necessary and required by the Personal Information Protection Officer of ndb Technologies to process it, the officer must evaluate and provide a written, reasoned response via email to the complainant. This evaluation aims to determine if the processing of personal information by ndb Technologies complies with this policy, any other policies and practices within the organization, and applicable laws or regulations. If the complaint cannot be processed within this timeframe, the complainant must be informed of the reasons justifying the extension, the status of the complaint processing, and the reasonable timeframe needed to provide a definitive response.

ndb Technologies must create a separate file for each complaint received. Each file contains the complaint, analysis, supporting documentation for its evaluation, and the response sent to the complainant.

It is also possible to file a complaint with the Commission d'accès à l'information du Québec or any other oversight body responsible for enforcing the law relevant to the subject of the complaint. However, ndb Technologies encourages anyone concerned to first contact its Personal Information Protection Officer and await the conclusion of the processing by ndb Technologies.

9. Approval

This policy is approved by the Personal Information Protection Officer of ndb Technologies, whose business contact information is as follows:

Personal Information Protection Officer:

Luc Hamel

1405 Ave. Saint-Jean-Baptiste Suite 111

Québec, QC G2E 5K2

Luc.hamel@ndbtech.com

For any inquiries, questions, or comments regarding this policy, please contact the officer via email.

10. Publication and Modifications

This policy is published on the ndb Technologies website and on all websites controlled and maintained by ndb Technologies, to which this policy applies, concerning the personal information collected therein. This policy is also disseminated through any means suitable for reaching concerned individuals.

ndb Technologies must also do the same for any modifications to this policy, which must also be subject to notice to inform concerned individuals.

Note: Please note that the use of the masculine gender is intended to lighten this policy and facilitate readability.