

## Confidentiality policy

LAST UPDATED ON SEPTEMBER 15,2003.

This confidentiality policy governs how *Plomberie Chauffage Normand Inc.* collects, uses, keeps and discloses the Personal Information collected from you and other Users (“**you**” and “**User**”) during your use of this website (the “**Website**”), whether it is used by way of the internet, a mobile device, or other electronic devices or through any other means. The Website is *Plomberie Chauffage Normand Inc.*’s property.

This confidentiality policy applies to the Website and to all products and services that we offer on the Website.

We hereby commit to protect the information that identifies you personally (as defined hereinunder) that we collect.

### 1. Definitions

“**Collection**” means the act of collecting, using, acquiring or obtaining Personal Information in any manner whatsoever and through any means whatsoever, including from Third Parties.

“**Consent**” means free and informed agreement to the Collection and/or Disclosure of Personal Information for the purposes that we have identified. The Consent may be explicit or implicit, as set forth at law, and may be given directly by the User or through an authorized representative. It must be unequivocal.

“**Disclosure**” means the act of revealing Personal Information to a Third Party.

“**Personal Information**” means any information regarding a natural person and that allows, directly or indirectly, to identify that person.

“**Personal Information Protection Officer**” means the person at *Plomberie Chauffage Normand Inc.* responsible for ensuring compliance with, and application of, this policy in accordance with section 3.1 of the *Act to modernize legislative provisions as regards the protection of Personal Information*.

“**Third Party**” means a person other than the User, *Plomberie Chauffage Normand Inc.* or its representatives;

“**User**” means any client or any person who accesses any customer service offered by *Plomberie Chauffage Normand Inc.* or who accesses the Website.

“**Use**” means the processing, manipulation and management of Personal Information by *Plomberie Chauffage Normand Inc.*

### 2. Responsibilities

We will inform you during the Collection and thereafter upon request, of :

- i) the purposes for which Personal Information is collected;
- ii) the means by which it is collected;

- iii) the access and correction rights set forth at law providing that any person may, freely, consult and correct a file or information held by *Plomberie Chauffage Normand Inc.*, that said person may also ask for the correction of inaccurate, incomplete or equivocal information and that said person may also ask for the deletion of outdated information or information irrelevant the object of the file;
- iv) your right to withdraw your Consent;
- v) if applicable, the name of the Third Party for whom the Collection was performed, the name of the Third Parties or categories of Third Parties with whom it is necessary to communicate the Personal Information for the purposes for which they were collected; and
- vi) if applicable, the possibility that said Personal Information will be communicated outside of the province of Quebec.

Any User providing Personal Information in accordance with the preceding consents to its use and communication for the purposes set forth in paragraph i) of the preceding section.

We are responsible for the Personal Information that we hold or store, which includes Personal Information transferred to a Third Party for processing purposes.

Moreover, we have designated a Personal Information Protection Officer who will be in charge of compliance and application of the principles set forth herein and of the *Act to modernize legislative provisions as regards the protection of Personal Information*. Other persons may also be designated, from time to time and at the discretion of the Personal Information Protection Officer, to carry on, in whole or in part, the responsibilities of the Personal Information Protection Officer.

We will communicate, upon request, the name of the Personal Information Protection Officer whose coordinates are set forth hereinbelow.

If applicable, we will obtain the Consent of the legal guardian or legal representative when we collect the Personal Information of a child under 14 years old.

We have developed various directives and practices allowing for the effective application of this policy, including :

- The implementation of policies and procedures guiding our governance with regards to Personal Information and destined to protect Personal Information and ensure compliance with this policy, providing for:
  - i) regulations applicable to the conservation and destruction of Personal Information; and
  - ii) the roles and responsibilities of the members of our personnel during the whole life cycle of Personal Information.
- The implementation of procedures relating to the receipt and processing of information requests or complaints;
- The implementation of a confidentiality incident log;
- The implementation of a Personal Information conservation schedule;

- Information and training given to employees with respect to the protection of Personal Information.

### **3. What Personal Information do we collect?**

We may collect two types of information from the Users of our Website:

- "information that personally identifies you" that may be used to locate you, communicate with you, or identify you (such as your names, email address, civic address, telephone number, username, credit card or tax accounts information, ...). This information will be securely kept by us in your customer account;
- "aggregated information" consisting of information with regards to your activities on the Website or relating to the services or products, and that may not be used to identify or locate you, or to communicate with you (such as frequency of visits to this Website, data entered while using the Website, most frequently viewed pages, type of browser, links on which Users click, IP address and other similar information).

### **4. When do we collect Personal Information?**

We collect Personal Information and other data in the following situations:

- When you use a credit card or other authorized means of payment in compliance with the terms and conditions of our Website to pay for our services, it is possible that we ask you for your name, address, and information relating to your credit card, tax accounts or other means of authorized payment, when applicable.
- When you fill in an order or service request form (including repair, maintenance or installation), cookies automatically record the information entered so that it will be automatically inserted when you access the same form in the future.
- When you create an account in the *Plomberie Chauffage Normand Inc.* Customer Center.
- When you schedule an appointment with us.
- When you communicate with us by e-mail, for example to ask information with regards to our services, to get information on invoices or to terminate a contract, if it is possible to do so.
- When you register for our newsletter.
- During each transaction or request for services, including repair, maintenance or installation, you have the possibility of modifying your account and providing information that personally identifies you.
- When you take part in a sweepstake or a promotional offer through the Website.
- When you post comments, give feedback, or submit suggestions through the Website.
- When you visit the Website, even if you do not log in, we collect information relating to your computer's operating system (Microsoft Windows, Mac OS, etc.) your IP address, your web browser (Firefox, Microsoft Explorer, Chrome, etc.) that you use, original website, User Data relating to your activities on the Website, including the pages that you visit or those that you share, the features that you use, as well as the total time spent on the Website. These data are used for the purpose of analyzing the performance of the Website and its services.

You can refuse to provide Personal Information personally identifying you, but this could limit your access to all of the Website features, including proceeding with any transaction, order or request of our services, including repair, maintenance or installation.

## **5. Cookies and other technologies used to collect information**

In addition to the Collection of the data as set forth hereinabove, we use various technologies to collect information from your computer with regards to your activities on our Website.

- **Cookies.** When you visit our Website, we could assign one or several cookies to your computer to facilitate your access and personalize your experience on our Website. A cookie consists in a small text file, which does not contain any information personally identifying you, that we install in the User computer browser. The use of a cookie may also allow us to collect information with regards to your activities on our Website, such as the web pages that you visit and the links on which you click. Most browsers automatically accept cookies, but you can change the configuration of your browser to allow you to refuse them. If you choose to refuse cookies, it is possible that you may not connect to, or may not be able to use other interactive features offered on the Website.
- **Other technologies.** We may also use standard Internet technology, such as invisible pixels and other similar technologies to follow your use of our Website. Invisible pixels are small images inserted on a web page for purposes similar to cookies to follow users activities. We could also insert invisible pixels in emails or newsletters to determine if the messages have been read and acted upon. The information that we receive through invisible pixels allows us to personalize the services that we offer to our visitors, to publish targeted ads and to evaluate the overall effectiveness of our online marketing, our content, our programming or other activities.
- **Information Collected by Third Parties.** We could allow Third Parties, including our authorized service suppliers, marketing firms, and advertising networks, to publish advertising on our Website. These businesses may use tracking technologies, such as cookies, to collect data on the Users that look at their advertising or interact with it. Our Website does not communicate any Personal Information to these Third Parties. The data collected allow them to publish targeted advertising and evaluate its effectiveness.

## **6. How do we use the Personal Information that we collect?**

We collect and use Personal Information or other data for the following purposes:

- *To personalize the User experience*
  - We could use the information as compiled data to understand how Users, as a group, use the services and resources provided on our Website.
- *To improve our Website and User experience*
  - We continually strive to improve the offer on our Website from the data, suggestions and comments that we receive from you.
  - We may use the information that we collect about you to, among other things, show the trends relating to data based on various demographic characteristics, or to present you with offers and rebates.
- *To improve customer service*
  - The information that you submit helps us to answer more efficiently to requests that you make to client services and to your support needs.

- When you submit questions or comments, we could use this information to better answer you.
- By providing us with your Personal Information, you are deemed to Consent to receiving telephone, email, postal, or text message communications from us i) to answer questions that you have submitted or ii) to follow up on your requests regarding our services or relating to the purchase or execution of our services.
- *To process transactions*
  - We may use the information provided by Users when requesting services, such as water heater installation, solely to process this request.
  - We do not trade any information with Third Parties relating to a credit card except insofar as necessary to provide the service.
  - If a transaction is completed, for example by the execution of a service contract for the repair of a heating or plumbing system, we may have to communicate Personal Information to a Third Party if this communication is necessary for the execution of the contract.
  - We may use your Personal Information to process the payment of amounts owed in consideration of the products and services purchased or provided.
- *To communicate with you and keep you informed*
  - The civic and electronic addresses provided by Users will be used to send information, promotional offers, and updates regarding our services. These addresses may also be used to provide answers to Users or to other requests or questions.
  - When you purchase services, you agree to subscribe to our commercial electronic message list by clicking on the box for that purpose at the bottom of the products or services request form. In addition to clicking on said box as proof of your Consent, a reconfirmation request (double opt-in) to subscribe to our newsletter by e-mail, text message or regular mail will be sent to you via each of these forms of communication. From the time of your double opt-in, you will receive emails or text messages that may include news concerning the business, updates and information about our products and services. If at any time you no longer wish to receive emails or text messages, you can unsubscribe by communicating with us through our Website or by directly communicating with the Personal Information Protection Officer.
- *For commercial purposes*
  - We may use the information provided by Users to post targeted advertising or content that, in our opinion, may be of interest to the User based on the information provided by the User.
  - We may provide data mining services to Third Parties who wish to better understand our Users by communicating to them aggregated information on the Website Users, such as their interests and purchases made.

- By communicating your Personal Information to us, you Consent to us communicating with you, for marketing and commercial development purposes, using the telephone number that you provided and your email address.

We may also use or sell the aggregated information, in particular the data relating to web pages viewed, for the purpose of improving the design, content and performance of our Website, or to analyze the use and popularity of certain pages of the Website.

### **7. Limits to the Collection of Personal Information**

We can only collect the Personal Information necessary to the purposes identified prior to Collection. We collect Personal Information from the User only, unless the User Consents or legislation allows the Collection from a Third Party.

We will make sure that you are informed of the purposes and means for which your Personal Information is Collected.

### **8. Limits to the use of Personal Information**

We may provide information personally identifying you to authorized suppliers of services helping us to provide the services and execute features on our behalf. They are not authorized to use this information for other purposes. If necessary, we will ask these partners to enter into a contract providing for i) the implementation of measures protecting the confidential nature of your Personal Information, ii) an undertaking to use this Personal Information solely in the course of the execution of their mandate or execution of the contract and iii) the undertaking not to keep said Information after the expiration of the contract.

We may disclose the Personal Information that we hold when required by legislation, for example to comply with a court order.

We may also disclose Personal Information in response to requests from organizations responsible for enforcing the law or other public agencies, if we deem that such Disclosure could prevent the commission a criminal act.

We may communicate depersonalized information to a person or organization that wishes to use said information for academic, research or statistical analysis purposes.

Finally, we may disclose Personal Information in the event of a transfer of our assets or property in the course of a reorganization of the company whether, contemplated or executed, such as a merger or acquisition within the limits authorized at law. In the event that such a reorganization, merger or acquisition takes place, we may use or communicate Personal Information in the course of our activities, in compliance with this Confidentiality Policy. If so, we will inform you of the fact that your Personal Information has been disclosed within a reasonable time period following the reorganization, merger or acquisition.

We may communicate or use your Personal Information to collect amounts that you owe us.

### **9. How do we protect you Personal Information?**

We follow standard practices for the Collection, storing and processing of data, as well as security measures to ensure protection against non-authorized access to your Personal Information, your

User name, your password, information relating to transactions and your data registered on our Website, as well as their protection against modification, Disclosure or destruction.

The communication of sensitive and private data between the Website and its Users is made through a secured and encrypted communication channel protected by digital signatures.

When you purchase our products or services, we (or our partners) will ask you to provide information relating to your credit card or invoicing data and an email address. We will use the information supplied relating to a purchase made by a User to process the order and for no other purpose.

We want you to use our Website with peace of mind. However, no system is completely safe. Consequently, while we take all the necessary measures to protect your Personal Information, we cannot guarantee that said Personal Information, searches, or other communications will remain always secure. Our Users acknowledge that they provide Personal Information at their own risk. As such, Users should also remain vigilant in the processing and Disclosure of their Personal Information and should avoid communicating Personal Information by non-secure email. For more information on how to protect you against identity theft, please visit the Federal Trade Commission website at the following address: <http://www.ftc.gov/bcp/menus/consumer/data.shtm>.

### **10. Third Party website**

On our Website, Users may find publicity or other content redirecting them to the sites and other services of our partners, suppliers, marketing firms, sponsors or other third parties. We do not control the content or the links that appear on these sites and are not responsible for the practices carried on by websites displaying links from or to our Website. Moreover, these sites or services, including their content and their links, may constantly change. These sites and services may have their own confidentiality and customer service policies.

Browsing on other websites and interacting with them, including sites displaying links to our Website, are subject to the policies and terms of these websites. We cannot be held liable for the Personal Information protection practices of these websites that are not owned by *Plomberie Chauffage Normand Inc.*

### **11. Accuracy and access to Personal Information**

We make sure that the Personal Information that we hold regarding a User is up-to-date and accurate at the time of making a decision with regards to a request.

We will update a User's Personal Information when necessary to make a decision, to satisfy the identified purposes or to correct, at the request of a User, a false Personal Information.

You may, by writing to the Personal Information Protection Officer, receive a copy of the Personal Information file that we hold about you and collected from you. Moreover, you may, by writing to the Personal Information Protection Officer, ask for the categories of persons that have access to your Personal Information, the use that is made with it, including the Disclosure to third parties and the duration of their conservation.

Should you demonstrate in your written request that the Personal Information that we hold about you is inaccurate or incomplete, we will modify it accordingly. We will reply to any such request



for access or modifications diligently and within a reasonable time period that will not exceed 30 days.

We do not charge any fee for access to your Personal Information file that we hold. However, we will ask for fees for the reproduction, communication or transcription of said Information.

We may refuse to communicate Personal Information if said communication is at risk of causing damages to *Plomberie Chauffage Normand Inc.*, to a Third Party or if it would be a breach of law. If so, we will justify our refusal.

## **12. Conservation of your Personal Information**

Your Personal Information will be kept on a server located in Canada for a period allowing us to satisfy the purposes that have been identified in this Confidentiality Policy. However, your Personal Information may be communicated and stored outside of Quebec by one of our partners, but if so we undertake to comply with the conditions set forth at article 17 of the *Act respecting the protection of Personal Information in the private sector*. Once our goals have been achieved and in accordance with the conservation schedule of your Personal Information (which stipulates, among other things, that our customers' files are completely destroyed after a period of 7 years from payment of the invoice associated with the services provided), we will destruct, withdraw or depersonalize your Personal Information. However, if any legislation provides for a specific period of conservation, we may store it for the time period provided by said legislation.

When information is destroyed or withdrawn, we will ensure that the process is secure in order to irrecoverably destroy the Personal Information or its support, such that it will be impossible to retrieve it in any manner whatsoever.

We covenant to protect the confidentiality of the Personal Information, including by ensuring that our servers satisfy all applicable information system security and protection standards. Access to Personal Information will only be possible for authorized personnel for commercial purposes or if their position so requires.

## **13. Your acceptance of this policy and its amendments**

By using this website, you confirm your acceptance of this policy. If you do not agree with this policy, do not access our Website. By continuing to use this Website following the publication of modifications to this policy, you will be deemed to have accepted these modifications.

We invite all Users to frequently view this page in order to remain up-to-date with this policy and of the manner in which we contribute to the protection of the Personal Information that we collect. We will publish on the website all modifications to this policy. Any modification to this policy comes into force on the date of its publication.

## **14. Withdrawal of your Consent**

You may communicate with the Personal Information Protection Officer at the coordinates below in order to withdraw your Consent with regards to the Collection or Disclosure of your Personal Information in our possession. Please note that withdrawing your Consent could result in our services no longer being available to you.

### **15. Affiliates and entities**

You Consent to *Plomberie Chauffage Normand Inc.*, its affiliates and related entities communicating to each other the Personal Information Collected by one or the other in compliance with this Confidentiality Policy.

### **16. Password**

In order to access your account via the Website, you must create and keep a password. This password is confidential and must not be disclosed to anyone. You are responsible for any use made using your account by a Third Party.

### **17. Complaint**

Any person may file a complaint by communicating with the Personal Information Protection Officer. In that regard, *Plomberie Chauffage Normand Inc.* has implemented a complaint processing procedure relating to Personal Information.

### **18. Intellectual property, copyrights and trademarks**

All of the content (information, writings, images, logos, icons, etc.) on this Website is the exclusive property of *Plomberie Chauffage Normand Inc.*, its affiliates, its related entities or Third Parties that have granted licenses, and may not be used, reproduced, distributed, displayed or sold in any manner whatsoever without *Plomberie Chauffage Normand Inc.*'s prior written authorization. All of the content on this Website is protected by Canada's applicable legislation relating to copyrights.

Only the downloading and printing of the content for purely personal and non-commercial uses are allowed. The downloading and printing of the content does not grant any explicit or implicit license or any copyright to a User.

The trademarks appearing on this Website (the visual as well as written aspects) are the exclusive property of *Plomberie Chauffage Normand Inc.*, its affiliates, related entities and third parties that have granted a license and may not be used, reproduced or copied without *Plomberie Chauffage Normand Inc.*'s prior written authorization and are subject to Canada's applicable trademark legislation.

### **19. Official version**

The French version of this policy is the official version and takes precedence over the English version.

### **20. Applicable laws**

This Confidentiality Policy is governed by the provincial and federal laws applicable in the User's province of residence.

### **21. To contact us**

Should you have any questions or complaints related to this Confidentiality Policy, the use of this Website or your interaction with this Website, or for any other matter, you can contact us at:

<https://www.plomberienormand.ca/en/contactez-nous>

OR

Attention : François Pineau, président  
PLOMBERIE CHAUFFAGE NORMAND INC.  
A-8501 Cordner Street  
Lasalle, QC  
H8N2X2  
[info@plomberienormand.ca](mailto:info@plomberienormand.ca)