



EAP and
organizational health

Privacy Policy



Table of Contents

1.	Purpose of the Policy	2
2.	Scope	2
3.	Personal Information	2
4.	Purposes for Which Personal Information Is Collected	3
5.	Consent	3
6.	Collection and Use of Personal Information	3
6.1.	Visiting Our Website and Requesting a Consultation	4
6.2.	Applying as a Professional/Practitioner with Brio EAP	4
6.3.	Creating a Job Alert	4
6.4.	Subscribing to BRIO EAP NEWSLETTER Communications	4
6.5.	Survey and/or Contest.....	5
6.6.	Customer Service	5
7.	Disclosure to Third Parties.....	5
7.1.	Service Providers	5
7.2.	Business Transactions.....	5
7.3.	Legal Requirements	6
8.	Use of Cookies	6
9.	Google Analytics and Advertising	7
10.	Links to Other Websites	7
11.	Data Retention and Destruction	7
12.	Security Measures	8
13.	Minors	8
14.	Your Rights With Respect to Your Personal Information.....	9
15.	Limitation of Liability.....	9
16.	Transparency, Concerns, and Complaints.....	10

1. Purpose of the Policy

Brio PAE (“Brio,” “we,” “us,” or “our”) places great importance on everyone’s right to privacy. That is why we have put in place this Privacy Policy to help ensure the protection of your integrity and your right to protect your personal information.

Our Privacy Policy not only meets the requirements of the Act respecting the protection of personal information in the private sector¹ and the Personal Information Protection and Electronic Documents Act², but also describes our standards for the collection, processing, use, disclosure, retention, and destruction of your personal information. This Policy also explains how we protect your personal information and the procedure to follow to exercise your rights of access and rectification.

This document is updated on an ongoing basis and at any time to ensure that you are aware of changes made to our privacy practices, as well as to standardize these practices and comply with applicable laws. We invite you to consult this Policy regularly to stay informed about how we handle your personal information.

By providing us with personal information (through our website at www.briopae.com, by email, in person, or by telephone), you agree that it will be processed in accordance with what is set out in this Policy, and you authorize Brio PAE and its agents, suppliers, or business partners to process your personal information for the purposes set out below.

2. Scope

Drawing on industry best practices, Brio PAE affirms its commitment to complying with the laws and regulations governing the protection of privacy and to protecting all confidential information it holds. All Brio PAE employees who use or disclose personal information are required to comply with this Policy.

Brio PAE’s responsibility for the protection of personal information also extends to its agents, service providers, and partners with whom Brio PAE may share certain personal information for the purpose of carrying out a mandate or performing a service or business contract. These parties must provide the same high level of protection for the personal information disclosed to them.

Brio PAE limits the personal information it provides to these third parties to only the information that is reasonably necessary to enable them to carry out their duties. The mandates and written contracts entered into with these third parties require them to take reasonable, lawful measures to ensure the confidentiality of this information.

3. Personal Information

Personal information is information about an identifiable individual who can be identified, contacted, or located, either directly or indirectly. This is information that, whether on its own or combined with other data, can allow an individual to be identified. This information is confidential, meaning it cannot be

disclosed to third parties without the consent of the person concerned, except where an exception is expressly provided for by law.

Personal information must be protected, and its retention must be ensured by the company or by a third party, regardless of the nature of its medium and regardless of its form: written, graphic, audio, visual, computerized, or otherwise.

4. Purposes for Which Personal Information Is Collected

Brio PAE must collect personal information to enable us to provide the services you want.

The purposes for which we collect your personal information are determined before or at the time of collection.

5. Consent

When we collect personal information about you in accordance with this Policy, we obtain your clear, free, and informed consent to use it for the purposes for which it was collected.

Brio PAE must obtain your consent to use your information for other purposes, to disclose it to third parties other than as provided for by the exceptions under the law, or to collect additional information about you.

This consent may be given in writing, verbally, or electronically. If you do not consent to the collection, use, and sharing of your personal information, we may be unable to provide you with the requested services, or the management of your file may be compromised.

You may withdraw your consent to the disclosure and/or use of your personal information at any time, subject to legal or contractual restrictions. We will inform you of the consequences of such withdrawal of consent, including the possibility that we may be unable to provide a service or process your request.

6. Collection and Use of Personal Information

We collect personal information about you in several ways, including when:

- You enter information on our website (<http://www.briopae.com>)
- You contact us by telephone, email, or instant messaging
- You post content on our social media accounts, among other things

Brio PAE may collect personal information when a person:

- Visits our website
- Submits a request for a web, email, or telephone consultation
- Sends us a follow-up request on behalf of a third person from their organization

- Applies for a job or opportunity as a professional/practitioner with Brio EAP
- Registers to receive emails related to employment and career opportunities
- Participates in a survey or contest
- Contacts us to share a comment, question, or complaint

Brio PAE typically uses and discloses personal information to provide access to services and to carry out the various follow-ups with the professionals/practitioners concerned. Brio PAE also uses your information to facilitate the search, selection, and recruitment of candidates and professionals/practitioners. Brio PAE may use certain non-confidential statistical and qualitative information and provide it in program usage reports to the organizations concerned.

6.1. Visiting Our Website and Requesting a Consultation

No personal information about you is collected when you simply access or browse the Brio PAE website. However, please note that whenever you access the Brio PAE website, certain information is automatically collected by our computer network. This information does not allow Brio PAE to personally identify you, but it does include information relating to your domain name and the IP address through which you access this website. This information may be used by Brio PAE for statistical purposes, including to evaluate and analyze the frequency of access to its website and the related traffic.

Your personal information is only collected when you voluntarily provide it to us, notably as part of your participation in any service, including a request for a web, email, or telephone consultation, which requires you to provide such information, and provided you have not expressed a refusal in this regard. Where you voluntarily provide personal information to Brio PAE, Brio PAE undertakes to collect, use, and/or disclose it in accordance with this Policy and applicable legislation.

6.2. Applying as a Professional/Practitioner with Brio EAP

You do not need to register or create an account to visit and browse certain features of our website. However, to apply for a job or opportunity as a professional/practitioner, we will collect mandatory fields such as: last name and first name, email, and telephone number, so that we can contact you about your application. When you apply, we may also review the resumé and cover letter that you upload. Other employment-related documents may be requested from you at a later time.

We use this information to process your application, assess your qualifications and suitability for the position you applied for, as well as for administrative purposes related to payroll or payments as a supplier.

6.3. Creating a Job Alert

If you register to receive job alerts, we will collect mandatory fields such as: your last name and first name, email, your job search keywords, job category, and the region(s) of your search.

6.4. Subscribing to BRIO EAP NEWSLETTER Communications

We may offer you the opportunity to sign up to receive emails containing information about your employment and career, or other newsletters from us. When you sign up, we collect information such as:

your full name and email address, which we use to send you the communications you have agreed to receive. You may opt out of receiving these communications from us by following the unsubscribe instructions provided in your email or by contacting us. Please note that you may continue to receive job alerts you have signed up for, as well as emails regarding the jobs you have applied for.

6.5. Survey and/or Contest

In administering a survey and/or contest, Brio PAE may use, subject to any refusal expressed on your part, the personal information provided to it on a voluntary basis through the sending of message(s) or following participation in a survey or contest. Information collected for a contest will primarily be used to contact you if you win. Contests offered by Brio PAE may be subject to specific rules, which will be more fully described when the contest is launched. Information collected through surveys will be used for quality and customer satisfaction purposes. Non-confidential data will be included in the statistics of the annual report provided to the organizations concerned.

6.6. Customer Service

When you contact us to share a comment, question, or complaint, we may ask you for information that allows us to identify you (such as your last name and first name, email address, and telephone number), as well as any additional information we need to respond promptly to your question, comment, or complaint. We may also retain this information to assist you in the future and to improve our customer service, offerings and services, and events.

7. Disclosure to Third Parties

Brio PAE undertakes not to disclose to third parties any personal information collected in accordance with this Policy or applicable legislation, unless it obtains your prior consent for that purpose, or in certain exceptional circumstances where Brio PAE believes in good faith that the law permits or requires it.

7.1. Service Providers

We may share your personal data with third-party service providers who help us provide, improve, and maintain our products and services. When you submit a request for a consultation, certain information necessary for a professional/practitioner to handle your request is transmitted to them. These service providers may have access to your personal data as part of their provision of services on our behalf. However, we require our service providers to adhere to strict data confidentiality and security standards. We do not authorize them to use or disclose personal information for their own marketing or other purposes. Our professionals/practitioners are also bound by strict confidentiality policies imposed by their professional order.

7.2. Business Transactions

As part of the evolution of our business, we may share your personal data with third parties in the context of mergers, acquisitions, restructurings, or asset sales. Brio PAE undertakes to protect your

personal data in such situations and to ensure that any sharing of data complies with applicable data protection laws.

When personal data is shared as part of these transactions, we will ensure that third parties respect your data protection rights, as well as the terms of this Privacy Policy. We will also inform affected users of any significant change in the ownership of their personal data or any change of control of our business, to the extent possible given our legal and contractual obligations.

New owners or business partners may have access to your personal data as part of these transactions. We will keep you informed of any significant change in the way your personal data is processed, and we will give you the opportunity to withdraw your consent or update your preferences, if necessary.

7.3. Legal Requirements

In certain cases, we may be required to disclose your personal data to government authorities under legal or regulatory requirements. Such disclosures may be made in response to a legal request, a subpoena, a court order, a search warrant, or other similar legal proceedings.

Brio PAE may also disclose your personal data to government authorities if we believe in good faith that such disclosure is necessary to:

- Comply with a legal or regulatory obligation
- Protect our rights, property, or safety, as well as those of our users or the public in general
- Prevent or investigate fraud, suspected illegal activity, or any violation of our terms of use

Brio PAE undertakes to disclose your personal data to government authorities only when strictly necessary and to comply with all applicable personal data protection laws and regulations in connection with such disclosures.

We will inform our users of any disclosure of personal data to government authorities where legally possible, unless prohibited by law or where doing so could compromise an ongoing investigation.

8. Use of Cookies

A cookie is a small data file sent by a web server to a web browser when the browser visits the server's website.

We obtain information about your overall online activity by using a cookie file stored on your computer's hard drive. Cookies help us improve our website and provide a better, more personalized service.

They allow us to:

- Remember your login;
- Identify you when you return to our site;
- Track web traffic on an aggregate basis (that is, without identifying any individual);
- Track campaigns;

- Retain session information, such as your last search.

You may refuse cookies by enabling the setting in your browser that allows you to decline the installation of cookies. Most browsers allow you to disable cookies. However, disabling cookies will likely limit your use of our website.

9. Google Analytics and Advertising

We use Google Analytics to identify you and link the devices you use when you visit our website on your browser or mobile device. Google Analytics helps us better understand how our users interact with our website and tailor our advertising and content to your needs. To learn more about how Google Analytics collects and processes your data, and how you can control the information sent to Google, please see Google's page "How Google uses information from sites or apps that use its services" at www.google.com/policies/privacy/partners/. To learn more about the opt-out options currently available for Google Analytics, as well as the Google Analytics Browser Add-on, please visit <https://tools.google.com/dlpage/gaoptout/>.

We may also use certain forms of display advertising and other advanced features through Google Analytics, such as Google Analytics remarketing, Google Display Network impression reporting, integration with DoubleClick Campaign Manager, and Google Analytics Demographics and Interests reporting. These features allow us to use internal login cookies (such as the Google Analytics cookie) together with third-party cookies (such as DoubleClick advertising cookies) or other third-party cookies to inform, optimize, and serve ads based on your past visits to the Service. You can customize your advertising preferences or opt out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>, or by consulting the NAI's online resources at <http://www.networkadvertising.org/choices>.

10. Links to Other Websites

Please note that clicking on links, advertising banners, and RSS feeds may transfer you to another website, where data privacy practices may differ from this Privacy Policy. It is your responsibility to review the privacy policies of other websites to ensure that you agree to your personal information being used in accordance with the privacy policies of those third parties. We accept no responsibility for, and have no control over, third-party websites, links, advertisements, or RSS feeds, or the information submitted to or collected by third parties.

11. Data Retention and Destruction

Personal information about you, when collected electronically by Brio PAE, is hosted on the following platforms: Microsoft Office 365; Sage 50 Canada; Microsoft Dynamics; EAP Software; Éolia Software. These platforms are subject to strict privacy and security regulations. Some of the platforms used are

located outside Quebec. A privacy impact assessment (PIA) is carried out for every data transfer outside Quebec. This assessment is carried out whenever a new service/software is adopted and/or whenever systems undergo major updates.

All personal information is retained electronically, and no personal information is retained in physical form.

Brio PAE ensures that personal information is retained only for as long as reasonably necessary to fulfill the purposes for which it was collected, or to meet other valid legal or business requirements.

Brio PAE takes reasonable steps to ensure that personal information is kept as accurate as necessary for its purposes. Requests to correct personal information are processed in accordance with the rights granted under applicable laws and good record-keeping practices.

The document destruction policy established within Brio PAE complies with the procedures and confidentiality rules set out by law.

12. Security Measures

We recognize that information security is an integral part of the confidentiality of personal information.

We have implemented and continue to maintain rigorous security measures to ensure that your personal information remains strictly confidential and is protected against loss or theft, and against any unauthorized access, disclosure, copying, use, or modification.

These security measures include:

- Organizational measures (use of security clearances and access restricted to what is necessary, a cybersecurity team, policies, guidelines, and compliance-focused training);
- Physical measures (electronic access management for employee offices, data backup and archiving through an external system, use of locked, key-secured filing cabinets, etc.);
- Technological measures (use of passwords and encryption, frequent password changes, two-factor authentication, use of firewalls and segmented access controls, protection measures against fraudulent emails, procedures established with our external collaborators, etc.).

All Brio PAE personnel and any third-party service providers we may retain who process personal information on our behalf are also contractually bound to respect the confidentiality of personal information.

13. Minors

The authorization of a parent or guardian is required for a child or young person under the age of eighteen (18) (a “minor”) to participate in any activity organized by Brio PAE, notably any survey or contest. Where such an activity is specifically directed at a minor, the authorization of the parent or

guardian will be expressly required. Brio PAE will not collect or use any personal information about minors without the consent of a parent or guardian.

14. Your Rights With Respect to Your Personal Information

In accordance with applicable personal information protection laws, an individual has the following rights:

- Right of access: the right to have confirmation of the existence of processing of personal information concerning them, and the right to obtain a copy of that personal information.
- Right of rectification: the right to request the correction of any incomplete, inaccurate, or ambiguous personal information we hold.
- Right to withdraw consent: the right to withdraw consent to the disclosure or use of the personal information collected.
- Right to information: the right to be informed of a decision based exclusively on automated processing using personal information. The right to be informed in advance of the use of any technology that allows a person to be identified, located, or profiled, and of the means available to activate the functions used to identify, locate, or profile them.
- Right to portability: the right to access computerized personal information in a structured, commonly used technological format.
- Right to de-indexing: the right to have any distribution of personal information ceased, or to have any hyperlink associated with their name de-indexed.

A request for access or rectification should be addressed to Brio PAE's Privacy Officer, whose contact information is indicated below.

Nathalie Boily, info@briopae.com

The Privacy Officer will respond in writing to the request for access or rectification diligently and no later than thirty (30) days from the date the request is received.

Any refusal by Brio PAE to grant a request will be justified in writing and will indicate the legal provision on which our refusal is based, as well as the recourse available to contest it and the time limit within which it must be exercised. Brio PAE also undertakes to assist you in understanding the refusal.

15. Limitation of Liability

The use of technologies such as the Internet involves significant risks. As a result, it is impossible to guarantee that the personal information you provide is completely secure. However, rest assured that Brio PAE implements all reasonable means at its disposal to protect your data.

Accordingly, you acknowledge that Brio PAE and its suppliers cannot be held liable for any damages or harm that may arise or result, directly or indirectly, from a breach of the confidentiality of data and/or information transmitted to Brio PAE over the Internet.

16. Transparency, Concerns, and Complaints

If you have any questions or concerns regarding this Privacy Policy or the way we handle your personal information, or if you wish to exercise your rights or file a complaint, please contact our Privacy Officer by email at the following address: info@briopae.com