

## PRIVACY, PERSONAL INFORMATION MANAGEMENT AND COMPLAINTS POLICY

**Last update:** November 14, 2025

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### 1. Purpose

The purpose of this policy is to ensure the protection of personal information held by AVRH / Balance RH and to comply with Quebec's Law 25. It specifies the rights of individuals, the obligations of the organization and the measures implemented to protect data.

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### 2. Scope

This policy applies to:

- All employees and collaborators of AVRH / Balance RH;
  - All clients and partners whose personal information is held by the organization;
  - All suppliers and subcontractors processing data on behalf of AVRH / Balance RH;
  - All projects, services and systems handling personal information.
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### 3. Responsibilities

**Person in Charge of the Protection of Personal Information (PCPI): H  l  ne Bourcier, CEO**

- Oversees application of the policy;
- Point of contact for employees, clients, suppliers and the *Commission d'acc  s    l'information*;
- Evaluation and approval of Privacy Impact Assessments (PIA) and supplier audits.

**Employees and consultants:**

- Comply with security and confidentiality rules;
- Immediately report any incident or complaint;
- Participate in annual data protection training.

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## **4. Collection and Processing of Personal Information**

- Only information strictly necessary for the intended purposes is collected.
- Information is obtained directly from the individuals concerned, with clear and granular consent where required.
- Types of processed information include, but are not limited to:
  - Employee data (contact details, SIN, payroll, benefits, photos, HR documents);
  - Client data (contact details, billing, contractual communications).

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## **5. Purposes, Consent and Privacy Commitment**

### **5.1 Purposes and Consent**

- Each purpose is subject to separate and documented consent (e.g., via employee or client forms);
- Individuals may withdraw consent at any time without impacting the performance of essential services;
- Consents are stored securely and accessible only to authorized persons.

### **5.2 Privacy Commitment**

AVRH / Balance RH is committed to protecting the privacy of users, clients and employees. Personal information is collected and used only with explicit consent and in accordance with applicable laws, including Law 25.

### **5.3 Acceptance of Terms**

- By accessing the organization's website or providing personal information, the individual accepts the terms of this policy and authorizes the processing of their personal information in accordance with it;
- This acceptance complements granular consents obtained from employees and clients.

### **5.4 Right to Withdraw Consent**

- Any individual may withdraw consent at any time;
- Withdrawal may be subject to certain legal or contractual restrictions (e.g., inability to provide certain services);

- Withdrawal is recorded and processed within a maximum of 30 days;
  - The organization informs the individual of possible consequences on service delivery or contract performance.
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## **6. Rights of Individuals**

In accordance with Law 25, individuals have the right to:

1. Access their personal information;
2. Correct or update their data;
3. Withdraw their consent;
4. Request portability of their information;
5. Request deletion of their data where legally permitted.

All requests are processed within a maximum of 30 days.

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## **7. Retention and Destruction of Information**

- Data is retained only for the duration necessary for its purpose or as required by law.
  - Destruction methods include:
    - Digital: secure and irreversible deletion, encryption;
    - Paper: shredding or secure destruction.
  - An annual review of retained data is conducted to ensure relevance and compliance.
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## **8. Access and Security**

- Access to personal information is limited to authorized employees based on their duties.

### **Technical and organizational measures:**

- Strong passwords and MFA (multi-factor authentication);
- Encryption of data at rest and in transit;

- Regular backups and restoration testing;
  - Access logging and continuous monitoring;
  - Mandatory annual employee training on data security.
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## **9. Disclosure to Third Parties**

- Any transfer of personal information to a supplier or subcontractor is preceded by a rigorous evaluation (supplier evaluation form / PIA).
  - Third parties must comply with Law 25 and provide adequate guarantees (contracts, audits, certifications).
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## **10. Privacy Incident Management**

- Any incident (loss, theft, unauthorized access) must be reported immediately to the PCPI.
  - The PCPI assesses the incident, takes corrective measures and informs:
    - The individuals concerned;
    - The Commission d'accès à l'information (if required).
  - An incident register is maintained for audit and follow-up purposes.
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## **11. Complaint Management**

- Complaints related to the protection of personal information are documented and handled impartially.
  - Each complaint includes:
    - An acknowledgment of receipt;
    - An evaluation and written response within a maximum of 30 days;
    - Follow-up to ensure resolution.
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## **12. Cybersecurity and Information Technology**

- IT systems and devices used to process data are secured according to best practices.
  - Backups are performed regularly and tested.
  - Personal devices (BYOD) used to access business information must comply with security rules (segregation of business data, wiping upon termination of employment).
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### **13. Training and Awareness**

- All employees receive initial training and an annual reminder on personal information protection.
  - The policy and associated procedures are accessible to all staff and updated regularly.
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### **14. Review and Updates**

- The policy is reviewed at least annually or following any significant change (law, technology, internal process).
  - Updates are communicated to all employees and published on the website, where applicable.
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### **15. Effective Date**

This policy comes into force upon publication and applies to all employees, clients, suppliers and partners of AVRH / Balance RH.

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#### **Approved by :**

Hélène Bourcier  
President and Chief Executive Officer  
AVRH / Balance RH

Signature : 

Date : 15 Dec. 2025