

PERSONAL INFORMATION PROTECTION POLICY

INTRODUCTION

Gagné Letarte (“GL”) protects all personal information it collects, obtains and holds in the provision of legal services to its clients in accordance with applicable personal information protection legislation. Personal information is kept confidential, except to the extent provided by law.

The policy set out in this document is intended to inform GL’s clients of its practices with respect to the collection, retention and communication of such information.

To provide its professional services, GL must have access to confidential information concerning its clients and must therefore ensure that any person in its employ that has access to the confidential information in its possession takes the necessary and appropriate steps to ensure that the information is both protected and kept confidential, and handles the information with care and discretion.

The procedure set out in this document determines the measures to be taken to eliminate the risk of serious prejudice to GL’s clients or any person wishing to do business with GL, in compliance with the applicable legislation.

DEFINITION OF PERSONAL INFORMATION

Personal information. This term refers to any information concerning an individual that allows that person to be identified directly or indirectly. A name by itself does not constitute confidential information. However, a name becomes confidential information as soon as it is associated or combined with other information relating to the same individual, for example, the person’s date of birth, address, social insurance number or telephone number.

Sensitive information. This term refers to any information that commands by its very nature a high degree of privacy, including medical, biometric, genetic, banking or financial information, and information relating to ethnic origin, political beliefs, sexual orientation or religious convictions.

Personal information does not, however, include the professional contact details of an individual whose name, title, position and telephone number are public.

PRIVACY POLICY

GL is responsible for personal information in its possession, custody or control in accordance with the applicable personal information protection legislation. This includes any personal information provided by its clients or obtained from any third party. The

collection of personal information is limited to what is strictly necessary to fulfill the purposes for which it is collected.

GL reserves the right to modify its privacy policy at any time, in which case the changes will be posted on its website. It is therefore recommended to review the privacy policy upon each visit to GL's website in order to keep abreast of any changes.

PURPOSES FOR COLLECTION OR COMMUNICATION OF PERSONAL INFORMATION

GL collects, uses or communicates personal information regarding its clients in order to provide legal services to them and represent them, particularly for the following purposes:

- Establishing and maintaining client relationships, providing advice and professional legal services and avoiding conflicts of interest;
- Communicating personal information to and sharing personal information with third parties with a view to providing legal services. Third parties may include opposing parties, interested parties, opposing, foreign and other counsel and advisors, witnesses, decision-makers and experts;
- Establishing and maintaining business relationships with its clients and representing them in various commercial or legal transactions, such as agreements of purchase, sale, lease, merger, or any other type of acquisition, disposal or financing, through the sharing or communication of the personal information necessary for the completion of the business transactions involved;
- Obtaining personal information from its clients, suppliers or third parties for billing, account administration, collection and payment processing purposes in order to fulfill its contractual obligations;
- Understanding the needs and interests of its clients and communicating with its clients, suppliers or third parties to conduct market research or evaluate its professional services;
- Distributing documents produced by GL or other information by email, conferencing or other means to anyone on GL's distribution lists;
- Collecting, using and communicating personal information obtained from applicants wishing to join GL in order to evaluate their candidacy;
- Increasing, developing and managing GL's activities;
- Detecting errors, negligence, breaches of contract, fraudulent acts and other illegal activities and protecting GL and third parties from such acts, and ensuring that the

policies and procedures established by GL are followed and comply with insurance requirements;

- Obtaining, using and communicating any information obtained from a client for any other purpose to which the client has consented.

THIRD PARTIES TO WHOM PERSONAL INFORMATION MAY BE COMMUNICATED

GL may from time to time, in the provision of legal services rendered with third parties, communicate personal information in connection with such legal services, to third parties such as:

- Opposing parties, experts or any other person who provides personal information as a client's agent or searches for such information in that capacity;
- GL's insurers and regulatory bodies such as the Quebec Bar, the Ordre des CRHA or any other professional association of lawyers, insurers or other parties in connection with regulatory or other activities relating to GL's obligations with regard to the practice of law;
- GL's personnel members, government authorities, consultants or agents to the extent that such personal information is reasonably required in the course of providing professional services or to establish, maintain or terminate an employment, contractual or partnership relationship;
- Third parties provided that the client has consented to such communication or that such communication is required or permitted by law. However, no information subject to and protected by solicitor-client privilege will be communicated unless the client has waived such privilege or given GL authorization to communicate such information in accordance with any applicable legislation or regulation.

FOREIGN THIRD PARTIES TO PERSONAL INFORMATION MAY BE DISCLOSED

Because of its professional affiliations with foreign law firms, notably through Legus, GL may, in the course of its professional activities, call upon such firms in the normal course of its business. As a result, it is possible that certain personal information concerning its clients may be transferred abroad or be subject to foreign legislation. However, GL undertakes to protect the personal information it holds, including any personal information entrusted to a Canadian or foreign service provider. Such service providers are required to have undertaken in writing to comply with GL's privacy policy, to refrain from disclosing any personal information and to preserve at all times the confidentiality and security of any personal information entrusted to them. Such service providers are also required to maintain adequate safeguards to protect the confidentiality of any personal information communicated to them by GL.

CONSENT

Any person who provides personal information to GL, its service providers or agents thereby authorizes GL to collect, use or communicate such personal information in accordance with this privacy policy, as authorized and required by law.

DURATION OF RETENTION AND DESTRUCTION OF PERSONAL INFORMATION HELD BY GL

Personal information provided to GL is retained only for the time and purposes set out in this privacy policy, or for the purpose of complying with the requirements of any legislation or regulation pertaining to the protection of personal information.

At the end of the applicable retention period and when the information is no longer required, GL undertakes to:

- destroy the information in a secure manner; or
- Anonymize the information for use for professional purposes only, in such a manner that the person who provided the information can in no way be identified or linked to the information.

PROTECTION OF PERSONAL INFORMATION OBTAINED BY GL

GL employs high standards of administrative and technological security to protect the confidentiality of personal information it has obtained or collected. Secure data networks protected by industry-standard firewalls and password protection systems are used for this purpose.

In addition, personal information is only accessible to persons authorized to access it where necessary in the course of their duties. GL has also implemented security measures to protect personal information against accidental or unlawful loss or destruction, disclosure, modification or access.

It is important to note, however, that no method of digital transmission or storage is totally secure. GL cannot therefore guarantee the security of personal information transmitted to it, since transmission is the responsibility of the person transmitting the information.

Nor can GL guarantee that personal information transmitted to or obtained by it will not be obtained, accessed, disclosed, altered or destroyed following a breach of its safeguards or security measures.

STORAGE OF PERSONAL INFORMATION

Personal information held by GL is kept in secure locations and on servers under its control, which are located either in its offices, in the offices of its service providers or in secure cloud storage centres recommended by its IT support providers.

CONFIDENTIALITY OF DATA COLLECTION, USE AND COMMUNICATION ON GL'S WEBSITE

When an individual visits its website, GL may use a browser feature called a “cookie” to collect information such as the type of Internet browser and operating system used, the domain name of the originating website, the date and duration of the visit, the number of visits, the average time spent on the website and the pages viewed. GL may, from time to time, collect personal information about visitors to its website for purposes of tracking, measuring usage, improving functionality and content, and facilitating use. However, visitors may refuse cookies, in which case they may not be able to access certain features of the website.

Any person visiting GL's website may join any email distribution list for the purpose of obtaining information and insight into legislation and case law, or to obtain publications produced from time to time by GL. GL may also send emails to any person whose contact details are in its database for the purpose of providing or receiving such information or publications. Any person receiving an email from GL for the above purposes may at any time unsubscribe to no longer receive e-mails.

GL's website may suggest or provide, for practical purposes only, links to other websites maintained by third parties. Visitors to the GL website should be aware that other websites may have privacy policies that differ from this privacy policy. GL declines all responsibility regarding these websites. It is therefore important to read their privacy policies before disclosing any personal information to them.

PRIVACY OFFICER

GL has appointed Mr. Serge Belleau as its Privacy Officer. He may delegate all or part of his duties to any person in writing. The Privacy Officer's duties include:

- Approving and implementing policies, procedures and practices relating to the governance and management of personal information, ensuring that they are known, understood and applied;
- Ensuring compliance with applicable legislation concerning the protection of personal information, particularly in the context of any project involving the acquisition, development or redesign of an information system or the electronic delivery of services

involving the collection, use, communication, retention or destruction of personal information. (Article 3.3)

- Maintaining an up-to-date register of any information security incidents that may have jeopardized information security, and documenting such incidents.

If you have any questions, complaints or comments about GL's personal information protection policy, please contact the Privacy Officer at the following address:

Gagné Letarte, sncrl
79 René Lévesque Boulevard
Suite 400
Quebec City, Quebec