



# **PRIVACY POLICY**

## **APPLICATION OF THE POLICY**

This Privacy Policy applies to **Fabelta and Fabelta Installation**.

Fabelta is a manufacturer of fenestration systems whose products are installed by Fabelta installation or other subcontractors. As part of our operations, we collect and process personal information which is governed by this policy.

The terms of this policy concerns: personal information, of our clients, candidates who apply for our job postings, employees, and certain suppliers or subcontractors.

Through this policy, we will explain the nature of the personal information we collect and use, the scope of your consent, our security measures to protect it, our means of communication and storage and your rights in respect to it.

Please note that Fabelta reserves the right to modify the content of this policy at any time. Any changes made will be posted on our website.

## **PERSONAL INFORMATION COLLECTED**

In terms of personal information, please be aware that this refers to any information relating to a physical person that can directly or indirectly identify that physical person. In the course of our operations, we collect your personal information in order to establish, manage and maintain the relationship we have.

As a customer, during our business relationship, we collect your name, your full contact information, your banking information or any other personal information necessary to fulfill the business relationship between us. This information is collected through administrative forms or by the web, when signing a contract, when you interact with one of our employees by email, phone or in person.

As an employee or job applicant, we obtain your name, contact information, date of birth, and career information from your resume or during your job interviews. Once employed by our company, we will also collect your Social Insurance Number (SIN), banking information, health, insurance and tax information; or any other relevant information to the job requirement.

In all cases, we may also obtain additional information about external sources, with or without your consent if permitted by law.

## **CONSENT**

You must freely and fully consent to the collection, use and disclosure of your personal information.

This consent may be implied, you may voluntarily provide us with your personal information, but it may also be expressly as you may consent orally, in writing, or electronically.

The personal information collected about job applicants and employees is necessary for our administrative management for the employee's employment contract. Without consent to collect this information, we reserve the right to cancel our employment agreement by terminating the employment contract.

The personal information collected about our customers, suppliers or subcontractors is necessary for the administration of the contract for which you requested our products and services. Your consent will be asked when you sign the agreement between us.

## **SECURITY & GOVERNANCE**

We take the issue of information security seriously and all administrative measures relevant to the protection and security of the personal information collected are put in emphasis in our company. We use access control mechanisms to ensure that only authorized personnel have access to data related to your services. Physical, technological, and connection measures and precautions are in place within our company to protect your data.

## **USE OF YOUR PERSONAL INFORMATION**

As a customer, we use your personal information to coordinate your entire customer project through a proposal or contract, from the signing of the contract, through installation and after-sales service. Employees who have access to your information are directly involved in the successful completion of your project and must obtain certain information at their stage of involvement. Employees who use your personal information are bound by confidentiality obligations under penalty of law.

As an employee, we use your personal information to manage your employee file relating to your function, to process your payroll, to carry out background checks, to verify justifications for absence, to respond to government requirements and services, to provide you with complementary employment services (insurance, EPA), to meet requirements related to occupational health and safety or occupational diseases or any other relevant actions to the exercise of rights.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

In the course of our operations, we may be required to disclose your personal information, within Canada, to third parties in certain limited circumstances permitted by law.

We may transfer your information to subcontractors in order to delegate part of the contract to improve your customer service; transmit this information to lawful authorized parties in order to comply with a governmental, court or regulatory order; or finally, transfer this information to our lawyers or prosecutors in order to defend ourselves or to assert our management rights, if applicable.

Regardless of the above-mentioned destination of your personal information that we may share, it is important to note that these instances are also subject to the same regulations surrounding the sharing and management of the personal information collected.

## **CONSERVATION**

We retain your personal information for as long as necessary to carry out your project and warranty, or for the time you have been with the company, for the purposes of complying with legal requirements and for as long as necessary to protect our legitimate interests. We reserve the right to destroy personal information from time to time. If you request the destruction of your personal information, we will use reasonable efforts to comply with that request. However, in some cases, we may retain some information in order to enforce our rights.

If you have any questions regarding this matter, please contact the Privacy Officer at the email address provided at the end of this policy.

## **YOUR RIGHTS**

With respect to your personal information, you have certain rights such as being informed about all the points shared in this policy, the right to access your information, to restrict its use to the extent that it does not prevent our relationship, the right to make corrections and to be informed if there is a privacy incident concerning your information.

You can exercise these rights by contacting the Privacy Officer as a client or the Human Resources Office as an employee.

## **PERSON IN CHARGE: PROTECTION OF PERSONAL INFORMATION**

The person responsible for the protection of personal information at Fabelta and Fabelta installation is Mr. Patrice Lapointe.

If you have any questions or requests about the policy, you can email them at [plapointe@fabelta.com](mailto:plapointe@fabelta.com)

For employees of Fabelta and Fabelta installation, we ask that you go directly through the human resources office.

