

Transcript

Privacy Policy

September 2024

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Background

This Policy is designed to protect the personal information you provide to Transcript and outlines the principles and practices we follow when collecting, using, disclosing, retaining or otherwise managing that information. It also informs interested individuals about how we process their personal information, including information collected through technological means.

Application and definitions

This Policy applies to Transcript and all Transcript officers, employees, and vendors, as well as to any individuals who provide services on behalf of Transcript. It also applies to our website.

The Policy covers all types of personal information we handle, including personal information relating to our vendors and employees, existing or potential clients, and any other individuals.

For the purposes of this Policy, personal information means information that can be used to directly or indirectly identify an individual (e.g., the person's name, home address, email address, telephone number, gender, banking information, health information, ethnicity, and language).

Sensitive personal information means information that entails a high level of reasonable expectation of privacy (e.g., banking, health, and biometric information, sexual orientation, ethnicity, political opinions, and religious or philosophical beliefs).

Generally, personal information does not include professional or business information, such as a person's name and title or business address, email address, and phone number.

The same applies to publicly available personal information according to the law.

Collection, use, and disclosure

In the course of conducting business, we may collect different types of information for different purposes. The types of information we might collect, along with details on how such information is collected and used (or the purpose it is used for), are listed in [Schedule A](#) of this Policy.

When collecting personal information, we will provide any other information required by law and will also let individuals concerned know what other types of personal information are being collected, how the information is being collected and what it is being collected for.

Transcript adheres to the following principles governing the collection, use, and disclosure of personal information:

Consent

- Generally, we collect personal information directly from the individuals concerned with their consent, except as otherwise provided by law. Consent may be obtained implicitly in certain situations, such as when individuals decide to provide their personal information after being informed by this Policy about [the use and disclosure of such information for the purposes stated herein](#). The individuals concerned can read this Policy and review the information herein at the time their personal information is collected.
- Normally, we must also obtain the consent of individuals concerned before collecting or disclosing personal information from or to third parties and before making secondary use of such information. However, we may collect or disclose personal information without consent in certain cases provided by law and under such conditions as the law may establish, particularly when such information is requested by government agencies, for example.

Collection

- In any event, we will collect information only if we have a valid reason for doing so. What's more, we will collect only the information we need to achieve the stated purpose.
- [Information collected from third parties](#) – We may collect personal information from third parties. Except as otherwise provided by law, we will ask for the consent of the individual concerned before collecting personal information from third parties. When the personal information we collect comes from another organization, not directly from the individual concerned, the latter may ask us to disclose the source of the information.

In some situations, we may also collect personal information from third parties without the consent of the individual concerned, provided that we have a serious, legitimate reason for doing so and that a) the collection is in the best interest of the individual and consent cannot be obtained in a timely manner or b) the collection is required to ensure the information is accurate.

We may also collect personal information indirectly through:

- **Mintz Global Screening** – We use Mintz Global Screening to meet the requirements of our clients.
- **eRailSafe** – We use eRailSafe to meet the requirements of our clients.

Collecting information through third parties might be needed to access certain services or programs, or to otherwise do business with Transcript. Where required, we will seek consent from individuals at the appropriate time.

Storage and use

- We ensure the information in our custody is up-to-date and accurate when used to make decisions about the individual concerned.
- We may use an individual's personal information only for the reasons outlined in this Policy or for any other reasons identified at the time the information was collected. If we need to use personal information for any other reason or purpose, we must seek new consent. Such consent must be explicit if sensitive personal information is involved. However, in certain cases provided by law, we may use personal information for secondary purposes **without consent**, such as when doing so:
 - clearly benefits the individual;
 - is necessary to prevent or detect fraud; or
 - is necessary to assess or enhance protection and security measures.
- **Limiting access** – We must implement measures to restrict access to personal information to only those employees and individuals within the organization who are authorized to view it and need that information to perform their duties. We will seek consent before granting anyone else access to personal information.

Disclosure

- Generally, and unless otherwise provided by this Policy or by law, we must obtain consent before disclosing personal information to a third party. What's more, we must obtain explicit consent before disclosing personal information when consent is required and when sensitive personal information is involved.
- However, we sometimes need to disclose personal information to third parties. We may disclose personal information **without the consent** of the individual concerned in cases including, but not limited to, the following:

- We may disclose personal information without the consent of the individual concerned to public agencies (e.g., government agencies), who collect such information through their representatives in order to perform their duties or roll out any programs they oversee.
- We may disclose personal information without consent to vendors who need that information, including event organizers, cloud service providers, and subcontractors we hire to deliver projects as part of the programs we manage. In such cases, we must have written contracts in place outlining the measures our vendors must take to ensure the confidentiality of the personal information disclosed, requiring vendors to use that information only in the performance of their contracts, and prohibiting vendors from retaining the information after their contracts have ended. Additionally, the contracts must require vendors to notify Transcript's Privacy Officer (named in this Policy) of any breach or attempted breach of confidentiality and must allow the Privacy Officer to investigate the matter.
- When the disclosure of personal information is necessary to complete a business transaction, we may share such information with the other party, without the individual's consent, in accordance with legal requirements.
- **Disclosure outside of Quebec:** We may disclose personal information in our custody to entities outside of Quebec when working with cloud service providers whose servers are not based in Quebec or when doing business with subcontractors operating outside the province.

Additional information on the technologies we use

- **Use of cookies**
Cookies are data files that a website asks the user's browser to store on their computer when the user visits the website. Cookies have various functions.

Our website uses cookies for the following purposes:

- To remember information such as a user's settings and language preferences and to keep track of a user's browsing session.
- To collect statistics on how visitors use our website and what content they access so we can improve our website.

Our website uses the following types of cookies:

- **Session cookies:** These are temporary cookies that expire after two hours.
- **Personalized session cookies:** These cookies are used to enhance site navigation and personalize the user experience (language preferences). They expire after two hours.

Some cookies may be disabled by default, and visitors to our website may enable them if they wish.

Visitors may also enable and disable cookies by changing their preferences in the browser settings.

Retention and destruction of personal information

Unless applicable laws and regulations provide for a minimum retention period, we will retain personal information only for as long as necessary to fulfill the purposes for which the information was originally collected.

The personal information we use to make a decision about an individual must be retained for at least one year following the decision in question or even seven years following the end of the fiscal year in which the decision was made if the decision has tax implications (e.g., the circumstances surrounding termination of employment).

At the end of the retention period or once the personal information is no longer needed, we will:

1. destroy it; or
2. anonymize it (i.e., irreversibly modify it to ensure that it can no longer be used to identify an individual or to establish a connection between the personal information and an individual) so that we can use it for serious and legitimate purposes.

To safeguard personal information, we will take the necessary steps to destroy it in a secure manner.

This section may be supplemented as needed by any policies or procedures Transcript has adopted regarding the retention and destruction of personal information.

Transcript's responsibilities

Generally speaking, Transcript is responsible for safeguarding the personal information in our custody.

Transcript's Privacy Officer is part of the management team. As a rule, the Privacy Officer must ensure compliance with applicable privacy legislation. The Privacy Officer is also responsible for approving policies and practices relating to the governance of personal information. More specifically, the Privacy Officer is responsible for implementing this Policy and making sure it is known, understood, and followed. If the Privacy Officer is unavailable or unable to perform their duties, another member of the management team will take on the role of privacy officer.

Transcript employees who have access to or are otherwise involved in handling personal information must adhere to this Policy and safeguard that information.

The roles and responsibilities of Transcript employees throughout the personal information life cycle may be set out in other policies Transcript has adopted in this regard, if any.

Data security

Transcript is committed to putting reasonable safeguards in place to protect the personal information we handle. Such safeguards must be appropriate to the purpose, amount, distribution, medium, and sensitivity of personal information. Consequently, information that may be considered sensitive will require enhanced security safeguards and protection. In particular, and as mentioned above regarding limiting access to personal information, we must implement the necessary measures to restrict the use of our information systems, ensuring that permission is granted only to individuals with a legitimate need to access the systems.

Right to access and correct personal information or withdraw consent

To exercise their right to access and correct personal information or to withdraw consent, individuals concerned must submit a **written request** to Transcript's Privacy Officer using the email address provided in the next section.

Subject to legal restrictions, individuals concerned may request access to their personal information in our custody and ask that it be corrected if it is incomplete, inaccurate or misleading. They can also request that we stop disclosing pieces of personal information relating to them or ask that any hyperlink connected to their names and providing access to their information through technological means be de-indexed if the disclosure of such information violates the law or a court order. They may do the same, or request that the hyperlink providing access to their information be re-indexed, when certain statutory conditions are met.

Transcript's Privacy Officer must respond to such requests in writing within 30 days of receiving them. Reasons must be provided for any refusal along with the legal provision justifying the refusal. In the event of a refusal, the Privacy Officer's response must indicate the remedies available under the law and the deadline to pursue such remedies. The Privacy Officer must help the individual understand why the request has been refused.

Subject to applicable legal and contractual restrictions, individuals concerned may withdraw their consent to the use or disclosure of the information we collected.

They can also ask us what personal information we collected, what categories of individuals at Transcript have access to their personal information, and how long that information is kept.

Complaint process

Complaint receipt

Individuals who wish to file a complaint regarding the implementation of this Policy or, more generally, the protection of their personal information by Transcript, must do so in writing by contacting Transcript's Privacy Officer using the email address provided in the next section.

They must provide their names and contact information (including a phone number) along with the subject of and reasons for the complaint in sufficient detail for us to assess the complaint. If the complaint is not specific enough, the Privacy Officer may request any additional information deemed necessary to assess the complaint.

Complaint handling

Transcript is committed to handling all complaints in a confidential manner.

Transcript's Privacy Officer must assess any complaints and respond to the complainant by email, with reasons, within 30 days of receiving the complaint or any additional information that the Privacy Officer may deem necessary or may require to address the complaint. The assessment will determine whether our handling of personal information is consistent with this Policy, any other practices and policies in place within the organization, and any applicable laws or regulations.

If the complaint cannot be processed within that timeframe, the complainant must be informed of the reasons for the extension, the status of the complaint, and the reasonable timeframe to provide a definitive answer.

We must create separate records for each complaint we receive. Each record must contain the complaint, the analysis and documentation supporting the assessment, and the response sent to the individual who filed the complaint.

Complaints may also be filed with the [Commission d'accès à l'information du Québec](#) or any other privacy oversight body responsible for enforcing the law relevant to the complaint.

However, we encourage anyone interested to first contact Transcript's Privacy Officer and wait until we have finished processing the complaint.

Approval

This Policy has been approved by Transcript's Privacy Officer, whose business contact information is listed below:

Privacy Officer

Claudine Lalonde

1525 Sherbrooke Street West
Montreal, Quebec H3G 1L7
clalonde@comtranscript.com
514-874-9134, ext. 204

If you have any requests, questions or comments regarding this Policy, please contact the Privacy Officer by [email](#).

Publication and amendments

This Policy is available on Transcript's website. This Policy must also be disseminated through any appropriate channels to ensure it reaches the individuals concerned.

The same applies to all amendments to this Policy, which must also be notified to the individuals concerned.

Document history table

Version	Effective date	Updates from previous version
1.0	September 8, 2023	N/A – <i>Initial version</i>
2.0	September 17, 2024	Document Review

Schedule A

Here is a non-exhaustive list that shows what types of information we may collect, how we may use the information or what we may use it for, and how we collect it. The list includes, but is not limited to, the items below.

Please note that most of the personal information we handle relates to staff members, job applicants, and freelancers. The information provided by the other categories of individuals listed in the table below is, most of the time, professional or business information. In most cases, we also collect information such as the individual's role or title and the organization's name and address.

Relationship with Transcript	Type of PI	Purpose of collection/Use	Means of collecting PI
Clients	<ul style="list-style-type: none"> Name Phone number Email address Banking information (deposit and payment) Language Address 	<ul style="list-style-type: none"> Establish and manage client relationships (set up client profiles) Provide services Respond to inquiries Determine clients' language preferences Process payments (incoming and outgoing wire transfers) 	<ul style="list-style-type: none"> By email (directly or through attachments)
Job applicants and staff members	<ul style="list-style-type: none"> Name Phone number Email address Banking information Social insurance number Date of birth Address 	<ul style="list-style-type: none"> Manage communications with applicants or employees Manage the payroll system and insurance records 	<ul style="list-style-type: none"> By email By phone
Freelancers	<ul style="list-style-type: none"> Name Phone number Email address Banking information Address Areas they specialize in and tools used 	<ul style="list-style-type: none"> Manage communications Process payments or invoices 	<ul style="list-style-type: none"> By email (directly or through attachments)
Vendors	<ul style="list-style-type: none"> Name Phone number Email address Banking information Language 	<ul style="list-style-type: none"> Manage projects Pay invoices Determine what languages they work with 	<ul style="list-style-type: none"> By email

Transcript
partners

- Name
- Phone number
- Email address
- Banking details
(when needed)
- Establish partnerships (sign
partnership agreements)
- Manage the relationship
- By email (directly
or through
attachments)