

Privacy Policy of 9090-3840 Québec Inc. Solu-Gestion

CANADA'S PRIVACY LAW

This privacy policy has been developed to comply with the standards established by the Personal Information Protection and Electronic Documents Act (PIPEDA) in Canada, as well as current or proposed provincial privacy legislation.

YOUR PRIVACY

Your privacy is important to **Financement Solu-Gestion** (collectively referred to in this document as "Solu-Gestion," "we," "our," and "us"). At Solu-Gestion, we are committed to meeting or exceeding the privacy standards set by federal and provincial regulatory bodies. All our information management practices are designed to comply with federal and provincial laws, including Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).

THE TEN PRINCIPLES OF PRIVACY LAW IN CANADA

Solu-Gestion is committed to maintaining the accuracy, confidentiality, and security of your personal and financial information. As part of this commitment, we have adopted the Ten Privacy Principles to govern our actions in managing personal information.

The ten principles prescribed by PIPEDA are:

1. **Accountability:** Assigning a designated Privacy Compliance Officer.
2. **Identifying Purposes:** Determining the purposes for which personal information is collected, at or before the time of collection, allowing organizations to define what information is necessary to fulfill these objectives.
3. **Consent:** The individual's informed knowledge and consent are required for the collection, use, or disclosure of personal information, except where inappropriate or legally defined.
4. **Limiting Collection:** Collection is limited to what is necessary for the identified purposes.
5. **Limiting Use, Disclosure, and Retention:** Personal information should only be used, disclosed, or retained for the purposes for which it was collected unless the individual consents or the law requires it.
6. **Accuracy:** Personal information must be accurate, complete, and up to date, as necessary for the purposes for which it is used.
7. **Safeguards:** Personal information must be protected by appropriate security measures based on the sensitivity of the information.
8. **Openness:** Organizations must be transparent about their policies and practices regarding personal information management.
9. **Individual Access:** Upon request, individuals must be informed of the existence, use, and disclosure of their personal information and granted access to it. They should also be able to challenge the accuracy and completeness of the information and have it corrected as necessary.

10. **Challenging Compliance:** An individual should be able to address a challenge concerning compliance with the above principles to designated individuals accountable for the organization's compliance.

WHAT INFORMATION IS COLLECTED?

At Solu-Gestion, we collect and use personal information to provide you with the financial services you have requested. Providing your personal information is always your choice. This information allows us to respond to your request. Most of the information we collect comes directly from you or through our Service Partners, who are required to adhere to our Privacy Policy. This information is obtained only with your consent.

The types of information we may request depend on the nature of your request. The essential information needed to fulfill most financial requests and applications includes your basic contact information (name, home address, email address, phone numbers), banking details (branch and account number), and employment or business information. We may also request additional information to help us provide the financial service you have requested, including but not limited to financial details such as assets, liabilities, income, and expenses.

HOW IS INFORMATION COLLECTED?

The collection, use, and disclosure of your personal information depend on the type of transaction(s) you wish to undertake with us. We may collect information from the following sources:

- a) From you, through credit applications or other forms completed via phone, email, or in-person meetings; for example, your name, address, phone number, email address, occupation, financial and banking details.
- b) From licensed agents, intermediaries, and representatives of financial services with whom you have a relationship.
- c) From your direct interactions with us; for example, through your payment history and previous loan subscriptions processed by us or other lenders.
- d) From government agencies and other entities.
- e) From credit bureaus; for example, your credit history or credit score.

LIMITING COLLECTION

Solu-Gestion ensures that only the information necessary for each case is collected. We will not ask you to provide information that is not absolutely essential to process your request or to establish or maintain our business relationship with you. Choosing to provide personal and financial information is always your decision. However, in the context of financial transactions, your decision not to disclose certain information may limit the services we can offer you or

prevent us from entering into a relationship with you. If we cannot fulfill your request based on the provided information, we may request additional details.

USE OF COLLECTED INFORMATION

We use personal information primarily to assess creditworthiness and to maintain, monitor, and enforce the agreements we have with you.

At Solu-Gestion, we use three main types of information:

- **Personal and Financial Information:** To process applications and provide requested services.
- **Transactional Information:** To track your interactions with us.
- **Anonymous/Non-Personal Information:** To improve our products and services.

Personal and Financial Information

We use your personal and financial information to communicate with you, process applications, and efficiently provide the requested products. As a client of Solu-Gestion, we strive to establish and maintain a positive relationship with you. To help achieve this, we use the personal information you have provided to communicate with you and protect your interests. We will keep you informed and respond to your specific needs or questions.

Unfortunately, sometimes business relationships may not work out, in which case we will use your personal information to legally enforce the terms of our agreement with you.

We only use personal information for the purposes disclosed to you. If, for any reason, your information is needed for a different purpose, we will inform you and request your consent before proceeding.

Transactional Information

A significant portion of the information we retain about you after entering into an agreement consists of transaction records that reflect your financial interactions with us or other personal information we obtain as a result of our agreement.

Solu-Gestion uses this information to:

- a) Verify the identity of a business operated by an owner/operator.
- b) Determine your eligibility for Solu-Gestion's financial products and services, whether purchased directly or indirectly from us, as well as for products and services that may interest you from organizations with whom we have strategic alliances, and offer them to you.
- c) Assess and underwrite risks.
- d) Determine applicable pricing, fees, borrowing costs, interest rates, and service costs.
- e) Detect and prevent fraud.
- f) Compile statistics, conduct market research, and report to regulatory bodies and industry agencies.

- g) Investigate specific transactions or patterns to detect unauthorized or illegal activities.
- h) Comply with legal or tax requirements.

Anonymous/Non-Personal Information

Anonymous/non-personal information is data that cannot be associated with or traced to an individual or specific business entity. For example, anonymous/non-personal information is automatically collected by web servers when you visit websites, including Solu-Gestion's site. This data may be used for research and analysis, such as determining the number of times our website has been visited or assessing the performance of a specific business sector or geographic region without accessing personal information that identifies an individual.

To better understand our markets, we may also collect analytical information by extracting demographic data from existing files, Statistics Canada, and various industry publications.

DISCLOSURE OF INFORMATION

Solu-Gestion, its affiliates, employees, service partners, and financing partners adhere to strict standards and policies to ensure your information is secure and handled with the utmost care and respect.

At Solu-Gestion, client information is strictly confidential. With your consent, we share information with our service and financing partners only when necessary and only for the original purposes for which the information was obtained. Unless disclosure is authorized by you, permitted, or required by law, we never sell or market information about you or your accounts to third parties.

Our Employees

As part of daily operations, access to private, sensitive, and confidential information is restricted to authorized employees with legitimate purposes. As a condition of employment, all employees of Financement Solu-Gestion must adhere to the confidentiality standards we have established. They are also required to act ethically and comply with all applicable laws and regulations. Employees are well-trained on the importance of confidentiality and must sign a confidentiality agreement prohibiting the disclosure of personal information to unauthorized individuals or entities.

Unauthorized access and/or disclosure of client information by a Solu-Gestion employee is strictly prohibited. All employees are required to maintain the confidentiality of client information at all times; any breach of this obligation will result in appropriate disciplinary action, which may include termination.

Our Service Partners

At Solu-Gestion, we have an extensive network of service partners. These partners facilitate Solu-Gestion's operations and our business relationship with you. As such, service partners may collect personal information on our behalf or receive personal information from us. All our service partners and their employees must adhere to our Privacy Policy when obtaining this information.

Our service partners agree to comply with our Privacy Policy as part of their contractual obligations with Solu-Gestion. These agreements, written or implied, define their responsibilities regarding the collection, use, and disclosure of personal information in line with our established privacy policies. They are prohibited from storing, analyzing, or using this information for purposes other than those for which the service was contracted.

Our Financing Partners

At Solu-Gestion, we source funding from various financial institutions and insurance companies to provide financial services to our clients. To facilitate this, we must share account details, including personal information, with our financing partners. Each time we process a credit application or enter into an agreement with you, we obtain your consent.

Solu-Gestion is committed to protecting your privacy and has entered into confidentiality agreements, verbal or written, with all our financing partners to ensure that your information is handled consistently with our established privacy policies and practices. Additionally, our financing partners, being financial institutions themselves, are subject to federal and provincial privacy laws and have confidentiality policies and procedures similar to those of Solu-Gestion.

Our Vendors

Occasionally, Solu-Gestion engages external organizations for specialized services such as market research, data processing, audit and accounting functions, legal services, and technology. Our trusted vendors may occasionally handle or manage certain information we receive from you.

When we outsource specialized services to vendors, only the information necessary to perform those services is provided. Furthermore, they are prohibited from storing, analyzing, or using this information for purposes other than those for which they were contracted. Indeed, our vendors are bound by strict contractual obligations to protect the confidentiality and security of your information. Moreover, under our agreements, our vendors and their employees are required to handle your information consistently with our established privacy policies and practices.

With Your Authorization

Credit bureaus and other financial institutions regularly contact us to obtain credit and financial information about clients. To respond to these inquiries, we require our clients' consent. This consent is generally obtained in a credit application or lease agreement signed by the client when requesting a specific product or service.

Credit Application

A credit application is generally how we collect your personal information. It serves to define the product or service you request, collect personal information, and assist us in determining the granting of these products or services. (These forms may have different names depending on the requested service, but their content is generally consistent with this description. The terms credit application or lease agreement refer to any Solu-Gestion form or contract.)

Regarding confidentiality, the credit application and/or lease agreement authorize us to:

- a) Collect credit information and related financial details from you, credit bureaus, other financial institutions, and the references you provided.
- b) Use personal or professional information to assess your financial situation, provide requested services, and propose additional products and services that may benefit you.
- c) Share your information with Solu-Gestion's financing and service partners.
- d) Share your information with credit bureaus and other financial institutions.

In most cases, your consent to use and/or disclose your information will be obtained in writing. In other cases, such as when applying for a financial product online, your consent will be obtained electronically.

When Required by Law

In certain circumstances, such as legal proceedings or court orders, we may be required to disclose certain information to authorities. Only the specifically requested information is disclosed, and we take precautions to ensure the requesting authorities have legitimate grounds for doing so.

When Permitted by Law

In certain situations, we are legally authorized to disclose personal information, such as using reasonable and legal methods to recover a delinquent account, a medical emergency, or suspected illegal activities.

Limitation of use

Solu-Gestion will only use your information for purposes directly related to or incidental to the operation of our business relationship with you and for no other purpose, unless you provide specific additional consent.

More specifically, Solu-Gestion does not sell, trade, or lend client lists or personal information to third parties. Solu-Gestion also does not use personal information for direct marketing purposes. Our business is limited to lease financing and equipment-related financing, and the personal information you provide will never be used for other purposes without your prior consent, except as expressly stated in this document.

Accuracy of your information

Solu-Gestion strives to ensure that the personal information we hold about you is as accurate and up-to-date as necessary for the identified purposes. If certain information needs to be updated or modified to reflect changes in your situation, we will do our best to update our records. Solu-Gestion will correct inaccurate or incomplete personal information and, if necessary, will make every effort to inform other parties that may have accessed the incorrect information.

RETENTION AND DESTRUCTION OF INFORMATION

We retain your information as long as you remain a client of Solu-Gestion. Once our relationship has ended, we proceed with the destruction of your information. Paper records are securely destroyed in locked bins and subsequently shredded. Electronic information is deleted from all computer systems and ultimately erased from our server.

Your personal information is retained as long as necessary to efficiently provide you with products and services, and for a reasonable time afterward to meet any potential legal or administrative obligations. Solu-Gestion takes precautions when storing or destroying your personal information to prevent unauthorized access.

OBTAINING YOUR CONSENT

We accept any of the following as your consent for the future collection and use of your personal information by Solu-Gestion for the identified purposes:

- a) Receipt of this Privacy Policy, unless you inform Solu-Gestion, either verbally or in writing, that you do not accept the terms outlined in this policy and wish to opt out, in whole or in part.
- b) The unrestricted provision of information to Solu-Gestion, either directly or through authorized representatives or financial services.
- c) Your written or verbal consent expressed during the credit application process.

d) Consent provided by your authorized representative, such as a lawyer, legal guardian, or through a power of attorney.

In some circumstances, your consent may be implied. For example, your consent is implied whenever we must:

a) Update our records regarding relevant credit information and obtain additional or periodic information from a credit bureau, a credit reporting agency, or any other agency referenced in this Privacy Policy explicitly to maintain your loan/account in good standing with us. This is done only when necessary, and you should consult relevant credit bureau sites to determine if and how periodic credit checks might affect your credit score.

b) If you have an existing agreement with us and request modifications to any terms of the agreement, it is presumed that the consent you provided at the beginning of the original loan remains valid.

WITHDRAWAL OF YOUR CONSENT

You may withdraw your consent at any time, subject to reasonable notice and any legal or contractual restrictions. Please note, however, that withdrawing your consent may affect our ability to continue providing the products and services you currently have or are seeking with us. To withdraw your consent, you must contact our Privacy Compliance Officer at the address or phone number provided in this document. Unless otherwise indicated by you, you give us your consent to collect, use, and disclose your personal information as outlined in this Policy for the identified purposes.

PROTECTING YOUR INFORMATION

At Solu-Gestion, we use advanced technology and maintain current security standards to ensure that your personal and financial information is protected against unauthorized access, disclosure, inappropriate alteration, or misuse. All security and safety measures are also tailored to the sensitivity of your information.

Client Records

Electronic client records are stored in a secure environment with restricted access. Confidential IDs and passwords are required for each system user, and automatic time-based logouts are implemented. Paper records are kept in locked filing cabinets or a secure file room with restricted access.

Information Security

We employ current technologies to ensure the confidentiality and security of your information.

To protect against unauthorized access to our database, users must log in using a protected ID and password to access specific secure areas of our database. Access is limited to the information necessary to perform each user's job functions.

PRIVACY COMPLIANCE OFFICER

The Privacy Compliance Officer at Solu-Gestion is responsible for administering this policy. The Privacy Compliance Officer at Solu-Gestion is: Stéphanie Guérard, 312 rue des Autochtones, Québec QC G2M 0K6, credit@solu-gestion.ca.

ACCESS AND MODIFICATION OF YOUR INFORMATION

At Solu-Gestion, decisions are often based on the information we have. It is therefore important that your personal and financial information is accurate and complete. As a client, you have the right to access, review, and modify the information contained in your personal and financial records.

Access to Your Information

You can request access to your account information by submitting a written request to Solu-Gestion. If you have questions about a decision made, we will inform you of the reasons for that decision upon request, provided we are legally permitted to do so. If, for any reason, access to factual information in your record is denied, you can challenge this refusal by contacting our Privacy Compliance Officer.

Modification of Your Information

To help us keep your personal information up to date, we encourage you to notify us of any inaccuracies or corrections as often as necessary. If applicable, we will make every effort to communicate these changes to other parties who may have inadvertently received incorrect information from us.

To Make a Change:

To update your personal contact information in your record, please call us at 1-418-905-0809 or send your request via email to credit@solu-gestion.ca.

QUESTIONS AND COMPLAINTS

If you have any questions regarding this policy or wish to file a complaint, please write to our Privacy Compliance Officer at the address listed in the section titled "Privacy Compliance Officer."

UPDATES TO THIS POLICY

Any changes to our privacy policy and information management practices will be reflected in this policy in a timely manner. We may add, modify, or delete parts of this policy as deemed appropriate. You can determine the most recent update to this policy by contacting our Privacy Compliance Officer.