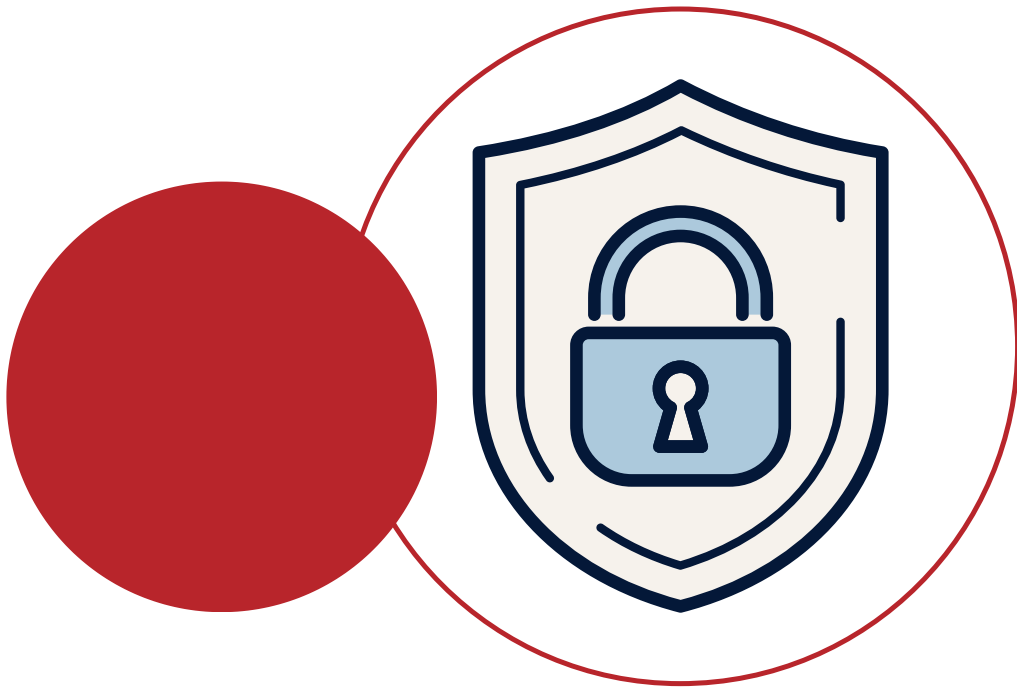


Privacy Policy



V. 1.00

Last update: January 25, 2025

INTRODUCTION

Trak Verification Solutions ("TRAK," "We," "Our," or "Us") is committed to taking the necessary measures to comply with the principles and requirements regarding privacy and personal information under the applicable legislation. This Privacy Policy (the "Policy") applies to the investigative services offered by TRAK (the "Services") as well as to the website www.groupepetrak.com (the "Site"). TRAK values your privacy and is committed to protecting it by adhering to this Policy.

DEFINITION

For the purposes of this Policy, "personal information" means any information, of any nature or in any form, relating to an identifiable individual and that can be used to identify them, or that may be used to identify them, directly or indirectly, alone or in combination with other information associated with or capable of being associated with that individual.

1. COLLECTION OF PERSONAL INFORMATION

The types of personal information that We may collect in the course of our background checks may include the following information:

- Last name;
- First name;
- Address(es);
- Date of birth;
- Phone number;
- Email address;
- Financial information;
- Any other personal information that You provide to Us when completing one of our inquiry forms, such as your driver's license number and banking information; and
- Any information about You obtained from a third party in the course of an inquiry, such as your employment history, credit report, or criminal record;

Information about individuals or companies contained in written or electronic documents that are publicly available is not considered Personal Information.

Personal Information is collected online when clients or authorized users register on the Site or Platform or submit a request to use Our Services. It may also be collected when a Candidate completes a consent form as part of a background check request submitted by a client on behalf of a third-party organization.



2. PURPOSE OF COLLECTION

We use Personal Information in the context of Our Services, where we conduct various inquiries and background checks. The Information collected and used in this context is subject to specific consent (see the Consent section).

We also use Personal Information to communicate with clients and candidates, to protect Ourselves from errors and fraud, to track personal transactions, and to comply with legislative and governmental requirements. It is likely that We use this Personal Information to make offers, to help Us grow and improve Our Site and Services, and to tailor them according to Your interests. We collect, use, and/or disclose Personal Information for the following purposes:

- To provide Our investigative and background check Services;
- to create and maintain Our client accounts;
- so that a third party can provide the requested service;
- to send information regarding the products and services You request and to respond to inquiries and questions;
- to process payments and recover outstanding debts;
- to detect and protect against errors, fraud, theft, and other illegal activities;
- to better understand Your needs and preferences;
- to carry out business operations;
- to provide customer service;
- to organize and manage contests and/or surveys;
- to inform You of new offers and promotions;
- to comply with legal requirements;

3. DISCLOSURE OF PERSONAL INFORMATION

TRAK will only disclose clients' or candidates' Personal Information with their consent or if it is legally authorized to do so, including in the following contexts:

- Candidates' Personal Information processed by TRAK in the course of the Services may be disclosed to third-party services or partners only when necessary to perform the requested verification. In such cases, these third parties have access only to the information required to carry out the task, are bound by confidentiality and security obligations, and may not use this information for any other purpose.
- TRAK may disclose Personal Information to a competent authority when such disclosure is required or permitted by law, including in response to a valid request related to an investigation, law enforcement, or legal proceedings. TRAK may also disclose Personal Information when necessary to prevent fraud or protect the safety of an individual, in accordance with applicable laws. In all cases, TRAK limits the disclosure to the necessary information and implements appropriate safeguards.
- In the context of a business transaction, in connection with the financing, securitization, insurance, sale, transfer, or any other proposed or completed disposition, in whole or in part, of TRAK, or its business or assets, for the purpose of evaluating and/or executing the proposed transaction. The assignees or successors of TRAK, or of its business or assets, may use and disclose your Personal Information for purposes similar to those described in this Policy.



4. CONSENT

TRAK collects, uses, and discloses Personal Information only with the required consent of when permitted or required by law.

In the context of the Verification Services, TRAK processes Personal Information about a Candidate at the request of a Client. The Candidate's consent is required before conducting a verification. As a standard practice, TRAK uses ETRAK, the consent form collection method, to obtain and retain proof of consent. When consent is obtained through ETRAK, TRAK implements reasonable checks to ensure that the form is properly completed and valid. However, if the Client chooses to provide a consent form to TRAK directly, the Client remains responsible for ensuring that such consent is valid, complete, and compliant with applicable laws before submission to TRAK.

The Candidate's consent is obtained solely for the Services and verifications specifically requested as part of a Request. The Candidate must consent to the applicable verifications, and TRAK only conducts verifications for which valid consent has been obtained.

When clients or authorized users register on the Site of Platform, or submit a request, they consent to the collection and use of the information necessary for the creation and management of the account, the execution of the Services, and support and billing, as applicable.

Subject to legal restrictions, the Candidate may withdraw their consent at any time. To withdraw or modify consent, the Candidate may contact TRAK at verifications@groupetrak.com

5. LIMITATION OF USE, DISCLOSURE, AND RETENTION

Personal Information collected will not be used, disclosed, or retained for purposes other than those specified at the time of collection, unless consent is obtained or as required by law. The use and disclosure of Personal Information is governed internally by our Personal Data Protection Procedure.

Your Personal Information is retained in accordance with our Personal Data Procedure as well as our retention schedule, which is specify the applicable retention periods. Unless otherwise indicated, data is retained for a period of one (1) year from the date of collection, in order to satisfy legal, accounting, or audit requirements.

6. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

TRAK implements reasonable efforts to ensure that a Candidate's Personal Information is accurate, complete, and up-to-date as required for the purposes for which it is intended. The Candidate may request access to the Personal Information that TRAK holds about them to review it and, where required, request corrections. The Candidate may also request the correction, deletion, or withdrawal of consent regarding the use of their Personal Information by contacting TRAK at vieprivee@groupepetrak.com. TRAK may refuse a request for modification if it conflicts with a legal obligation.

Before granting a Candidate access to their Personal Information, providing them with the Personal Information that TRAK holds about them, or making the requested changes, TRAK may request additional information to verify the Candidate's identity and their right to access such information. In certain cases, applicable laws may require TRAK to deny access to part or all of the Personal Information held, or it may no longer be able to provide it when such information has been destroyed, erased, or anonymized in accordance with legal retention obligations and personal information protection practices.

If TRAK is unable to grant the Candidate access to their Personal Information, TRAK will inform them of the reasons for the refusal, subject to any legal or regulatory restrictions.

In the event that the Candidate's Personal Information was provided by a third party, TRAK may direct the Candidate to communicate directly with that third party, where appropriate, in order to exercise their rights or obtain further information.

7. SECURITY

We protect the Personal Information that we hold or control by using physical, electronic, and administrative security measures that are appropriate given the nature and sensitivity of the information. These measures include the implementation of firewalls and encryption technologies. We take reasonable steps to ensure that only employees and contractors who need access to confidential data to perform, develop, or improve our Services are authorized to access it. However, please note that no security measure can provide absolute security.

To ensure the security of your Personal Information, we implement physical, administrative, and technological measures appropriate to the sensitivity of the information (e.g., access controls, authentication, encryption, logging and monitoring, security testing and updates). These measures evolve over time and are not exhaustive.

TRAK maintains a privacy incident management process. In the event of an incident involving Personal Information, TRAK takes reasonable steps to contain the incident, limit its impact, remediate the situation, and reduce the risk of recurrence. TRAK promptly notifies the affected parties, including the individuals concerned and the relevant authorities.

Futhermore, the safety and security of information related to the Client's account also fall under the responsibility of the Client and any authorized user. If the Client (or an authorized user) chooses a password to access the platform, they are responsible for protecting this password, maintaining the confidentiality of their credentials, and taking reasonable steps to prevent any unauthorized access. The Client agrees not to share their credentials with unauthorized their parties.

8. INTERNATIONAL TRANSFER OF INFORMATION

In the context of providing the Services, Personal Information is hosted in Quebec. TRAK does not host Personal Information outside of Canada.

However, for certain types of verification, TRAK may need to disclose or have certain Personal Information of the Candidate processed outside of Canada when necessary to perform the requested verification, including with partners, third parties, or external sources located abroad.

Please note that the privacy laws of the relevant jurisdictions may differ from those of Quebec and Canada. When a Candidate's Personal Information needs to be disclosed or processed outside of Canada for the purposes of a verification, TRAK implements reasonable measures (contractual, organizational, or technical) to protect this information. This information remains subject to the legal requirements applicable in those jurisdictions, which may, in certain circumstances, impose obligations to disclose to government or law enforcement authorities.

By using the Services or submitting a verification request, the Client acknowledges that certain Personal Information of the Candidate may be disclosed outside of Quebec or Canada when necessary to perform the requested verification. For any questions regarding transfers outside of Quebec/Canada, you may contact us at vieprivee@groupepetrak.com



9. TRANSPARENCY

This Privacy Policy and any related information are available at all times on Our website, www.groupetrak.com, under Privacy Policy, or upon request.

10. AMENDMENT OF THE PRIVACY POLICY

This Policy is subject to updates. The date of the most recent update appears at the bottom of this Policy. We encourage you to review it periodically to stay informed about how we protect Personal Information.

11. RESPONSIBILITY

TRAK is responsible for the Personal Information under its control. When TRAK engages service providers or partners necessary for processing certain verification, TRAK takes reasonable steps to ensure that these third parties protect Personal Information in accordance with this Policy and applicable laws. Access to Personal Information is limited to what is necessary to perform the task, and these third parties are subject to confidentiality and security obligations.

12. LEGISLATION

TRAK's Policy has been implemented to comply with the Personal Information Protection and Electronic Documents Act (Canada) and any other provincial privacy legislation, including the Act Respecting the Protection of Personal Information in the Private Sector (Quebec).

13. INDIVIDUALS UNDER 16 YEARS OF AGE

Individuals under the age of 16 are not permitted to provide or display Personal Information on our online Services.

14. CONTACT US

For any questions or comments regarding this Policy, Clients (or an authorized user) as well as Candidates may contact our Privacy Officer. Requests for access, correction, deletion (where applicable), withdrawal of consent, or the filing of a privacy-related complaint should be addressed to : vieprivee@groupepetrak.com.

TRAK will inform individuals who submit a comment or file a complaint of the applicable procedure, where appropriate. When a complaint is found to be valid, TRAK will take appropriate measures, including, if necessary, updating its policies, procedures, or practices.



**SIMPLIFY YOUR BACKGROUND
CHECKS**

