

Privacy policy

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1. Policy purpose

Brio PEAP ("Brio", "we", "us" or "our") values everyone's right to privacy. That's why we've created this Privacy Policy to ensure your privacy and your right to protect your personal information.

Our Privacy Policy not only meets the requirements of the Act respecting the protection of personal information in the private sector¹ and the Personal Information Protection and Electronic Documents Act², but also describes our standards for the collection, processing, use, communication, storage and destruction of your personal information. This policy also explains how we protect your personal information and the procedure for exercising your rights of access and rectification.

This document is updated on an ongoing basis and at any time to ensure that you are aware of any changes to our privacy practices, as well as to unify these practices and comply with applicable laws. We invite you to consult this policy regularly to stay informed about how we handle your personal information.

By providing us with personal information (through our website www.briopae.com, by e-mail, in person, or by telephone), you consent to the processing of your personal information as set out in this policy, and you authorize Brio PAE and its agents, suppliers or business partners to process your personal information for the purposes set out below.

2. Field of application

Brio EAP is committed to complying with the laws and regulations governing the protection of privacy and to protecting the confidentiality of all information in its possession. All employees of Brio EAP who use or disclose personal information are required to comply with this policy.

Brio EAP's responsibility to protect personal information also extends to its agents, service providers and partners with whom Brio EAP may share certain personal information to carry out a mandate or perform a service or business contract. They must provide the same high level of protection for the personal information they share.

Brio EAP limits the personal information it provides to these third parties to that which is reasonably necessary for them to carry out their duties. Mandates and written contracts with such third parties require them to take reasonable and lawful measures to ensure the confidentiality of such information.

¹Act respecting the protection of personal information in the private sector, RLRQ, c. P-39.1.

²Personal Information Protection and Electronic Documents Act, R.S.C. 1985, c. P-21.

3. Personal information

A personal information is a piece of information about a physical person that can be identified, contacted or located either directly or indirectly. This information, when taken alone or combined with other data, may allow an individual to be identified. This information is confidential, i.e. it cannot be communicated to third parties without the consent of the person concerned, except in cases expressly provided for by law.

Personal information must be protected and retained by the company or by a third party, regardless of the nature of the medium and in any form: written, graphic, sound, visual, computerized or other.

4. Purposes for which personal information is collected

Brio PAE needs to collect personal information to provide the services you require.

The purpose for which your personal information is collected shall be identified at or before the time the information is collected.

5. Consent

Where we collect your personal information in accordance with this policy, we will obtain from you clear, free and informed consent to use it for the purpose it was collected.

Brio EAP requires your consent to use your information for any other purpose, to disclose it to third parties other than as permitted by law, or to obtain additional information about you.

Such consent may be provided either in writing, verbally or electronically. If you do not consent to the collection, use and sharing of your personal information, we may not be able to provide you with the services you have requested, or the processing of your file may be compromised.

You may withdraw your consent to the disclosure and/or use of your personal information at any time, subject to legal or contractual restrictions. We will inform you of the consequences of such withdrawal of consent, including the possibility that we may not be able to provide a service or process your request.

6. Personal information collection and use

We collect personal information about you in several ways, including when:

- You enter information on our website (<http://www.briopae.com/en>)
- You contact us by phone, e-mail or instant messaging
- You publish content on our social media accounts

Brio PAE may collect personal information when an individual:

- Visits our website
- Requests a web, e-mail or phone consultation
- Sends us a follow-up request for a third party in your organization
- Applies for a job or an opportunity as a professional at Brio EAP
- Signs up to receive jobs and career-related emails
- Participates in a survey or contest
- Contacts us with a comment, question or complaint

Brio EAP usually uses and communicates personal information to ensure access to services and various follow-ups with the professionals concerned. Brio EAP also uses your information to facilitate the search, selection and recruitment of candidates and professionals. Brio EAP may use certain non-confidential statistical and qualitative information to provide reports on the use of the assistance program to the organizations concerned.

6.1 Visit our website and request a consultation

No personal information about you is collected when you simply access or browse the Brio EAP website. It should be noted, however, that when you access the Brio EAP website, certain information is automatically collected by our computer network. This information does not allow Brio EAP to identify you personally but includes information such as your domain name and IP address through which you access this website. This information may be used by Brio EAP for statistical purposes, to enable it, to evaluate and analyze the frequency of access to its website and related traffic.

We only collect personal information from you when you voluntarily provide it to us, such as while participating in any of our services, including a web, e-mail or telephone consultation request, which requires you to provide such information, and when you have not indicated that you do not wish to provide such information. If you voluntarily provide Brio EAP with personal information, Brio EAP will collect, use and/or disclose such information in accordance with this Policy and applicable law.

6.2 Apply for a job at Brio EAP

You do not need to register or create an account to visit and browse certain features of our website. However, to apply for a job, we will collect mandatory fields such as: first and last name, email and phone number so that we may contact you regarding your application. When you apply, we may also consult your resume and cover letter that you uploaded. Other employment-related documents may be requested later.

We use this information to process your application, to evaluate your qualifications and suitability for the job for which you have applied, and for administrative purposes related to payroll or payments as a supplier.

6.3 Create a job alert

If you sign up to receive job alerts, we will collect mandatory fields such as: your first and last name, e-mail address, job search keywords, job category and search area(s).

6.4 Subscribe to BRIO EAP's NEWSLETTER

We may offer you the opportunity to sign up to receive e-mails containing job and career information or other newsletters from us. When you register, we collect information such as your full name and e-mail address, which we use to send you the communications you have agreed to receive. You may refuse to receive these communications from us by following the unsubscribe instructions provided in your e-mail or by contacting us. Note that you may continue to receive job alerts for which you have registered, as well as e-mails regarding jobs to which you have applied.

6.5 Survey and/or contest

While administering a survey and/or contest, Brio EAP may use, subject to any refusal expressed by you, personal information as provided to it on a voluntary basis by sending message(s) or following participation in a survey or contest. The information collected for a contest will be used primarily to contact you if you win. Contests offered by Brio EAP may be subject to specific rules that will be more fully described at the time of launch. Survey information will be used for quality and customer satisfaction purposes. Non-confidential data will form part of the statistics in the annual report submitted to the organizations concerned.

6.6 Customer service

When you communicate a comment, question or complaint with us, we may ask you to provide personal information (such as first and last name, e-mail address and telephone number) as well as additional information we need to respond promptly to your question/comment or complaint. We may also keep this information to assist you in the future and to improve our customer service, benefits, services and events.

7. Third-party communication

Brio EAP will not disclose to third parties any personal information collected in accordance with this policy or applicable legislation, except with your prior consent or in extraordinary circumstances where Brio EAP does not believe in good faith that the law permits or requires such disclosure.

7.1 Service providers

We may share your personal data with third-party service providers who help us provide, improve and maintain our products and services. When you make a request for a consultation, certain necessary information for a professional to deal with your request is transmitted to them. These service providers may have access to your personal data while providing services on our behalf. However, we require our service providers to adhere to strict standards of confidentiality and data security. We do not authorize them to use or disclose personal information for their own marketing or other purposes. Our professionals are also bound by strict confidentiality policies set by their professional associations.

7.2 Sales operations

As our business evolves, we may share your personal data with third parties in the context of mergers, acquisitions, restructurings or asset disposals. Brio EAP is committed to protecting your personal data in such situations and to ensuring that any data sharing complies with applicable data protection laws.

Where personal data is shared as part of these transactions, we will ensure that third parties respect your data protection rights, as well as the terms of this privacy policy. We will also inform affected users of any material change in the ownership of their personal data or any change in control of our business, to the extent possible given legal and contractual obligations.

It is possible that new owners or business partners may have access to your personal data with these transactions. We will keep you informed of any significant changes in the way your personal data is processed, and we will give you the opportunity to withdraw your consent or update your preferences, if necessary.

7.3 Legal requirements

In some cases, we may be required to disclose your personal data to government authorities pursuant to legal or regulatory requirements. Such disclosures may be made in response to a legal request, subpoena, court order, search warrant or similar legal process.

Brio EAP may also disclose your personal data to government authorities if we believe in good faith that such disclosure is necessary to:

- Comply with a legal or regulatory obligation
- Protect our rights, property or safety, as well as those of our users or the public
- Prevent or investigate fraud, suspected illegal activity or any violation of our terms of use

Brio EAP undertakes to disclose your personal data to government authorities only when strictly necessary and to comply with all applicable laws and regulations regarding the protection of personal data in connection with such disclosures.

We will inform our users of any disclosure of personal data to governmental authorities where this is legally possible, unless this is prohibited by law or could compromise an ongoing investigation.

8. Use of cookies

A cookie is a small data file sent by a Web server to a Web browser when the browser visits the server's site.

We obtain information about your overall Internet activities by using a cookie file stored on your computer's hard drive. Cookies help us improve our site and provide better, more personalized service.

They allow us to:

- Remember your connection.
To identify you when you return to our site.
- Track web traffic on a global basis (i.e. no individual is identified).
- Tracking campaigns.
- Keep session information such as your last search.

You can refuse cookies by activating the setting in your browser that allows you not to accept cookie installation. Most browsers allow you to disable cookies. However, disabling cookies may limit your use of our Web site.

9. Google Analytics and advertising

We use Google Analytics to identify you and link the devices you use when you visit our website on your browser or mobile device. Google Analytics allows us to better understand our users' interactions on our website and to tailor our advertising and content that fit your needs. To find out more about the collection and processing of your data by Google Analytics, and how you can control the information sent to Google, visit Google's "How Google uses information from sites or applications that use its services" at www.google.com/policies/privacy/partners/. To find out more about the opt-out options currently available from Google Analytics, as well as Google Analytics Browser Ad-On, go to:

<https://tools.google.com/dlpage/gaoptout/>

We may also use certain forms of display advertising and other advanced features via Google Analytics, such as remarketing with Google Analytics, Google Display Network impression reporting, DoubleClick campaign manager integration, Google Analytics demographics and interests reporting. These features allow us to jointly use internal cookies (such as the Google Analytics cookie) and third-party cookies (such as DoubleClick advertising cookies) or other third-party cookies to inform, optimize and display ads based on your previous visits to the Service. You can customize your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preference Manager, currently available at <https://google.com/ads/preferences>, or by visiting NAI's online resources at:

<http://www.networkadvertising.org/choices>.

10. Links to other websites

Please note that clicking on links, banner ads and RSS feeds may result in your being transferred to another website, where data privacy practices may differ from this Privacy Policy. It is your responsibility to check the privacy policies of other websites to ensure that you agree to the use of your personal information in accordance with the privacy policies of those third parties. We accept no responsibility for and have no control over third party websites, links, advertisements or RSS feeds or information submitted to or collected by third parties.

11. Storage and destruction of data

Your personal information, when collected electronically by Brio EAP in accordance with this policy, is hosted on SharePoint Office365; Sage Canada; EAP Software and other computer platforms used, which are also subject to strict confidentiality and security regulations.

Sensitive personal information about you, when collected in physical form by Brio EAP in accordance with this policy, will be kept on Brio EAP's premises.

Brio EAP ensures that personal information is retained only as long as reasonably necessary for the fulfillment of the purposes for which it was collected or to meet other valid legal or business requirements.

Brio EAP takes reasonable steps to ensure that personal information is kept as accurate as necessary for its purposes. Requests for correction of personal information are handled in accordance with the rights granted under applicable laws and good record-keeping practices.

Brio HR's document destruction policy complies with the procedures and confidentiality rules laid down by law.

12. Safety measures

We recognize that information security is an integral part of personal privacy.

We have implemented and continue to develop rigorous security measures to ensure that your personal information remains strictly confidential and is protected against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

These safety measures include:

- Organizational measures (e.g., use of security clearances and restricted access to what is necessary, cybersecurity team, policies, guidelines and compliance training).
- Physical measures (e.g. electronic office access for employees, external data backup and archiving, etc.).
- Technological measures (e.g. use of passwords and encryption, frequent password changes, use of firewalls and segmented access operators, etc.).

All Brio EAP members and third-party service providers we may retain who process personal information on our behalf are also contractually bound to respect the confidentiality of personal information.

13. Minors

A parent's or guardian's authorization is required for a child or young person under eighteen years of age. (18) years of age (a "minor") to participate in any activity organized by Brio EAP, including any survey or contest. If such an activity is specifically intended for a minor, the authorization of the parent or guardian will be expressly required. Brio EAP will not collect or use any personal information about minors without the consent of a parent or guardian.

14. Your rights regarding your personal information

In accordance with applicable privacy laws, an individual has the following rights:

- **Right of access:** the right to obtain confirmation of the existence of processing of personal information concerning him/her and the right to obtain communication of this personal information.
- **Right of rectification:** the right to request rectification of any incomplete, inaccurate or ambiguous personal information we hold.
- **Right to withdrawal of consent:** the right to withdraw consent to the communication or use of personal information collected.
- **Right to information:** the right to be informed of a decision based exclusively on automated processing that uses personal information. The right to be informed in advance of the use of any technology to identify, locate or profile an individual, and of the means available to activate the functions used to identify, locate or profile the individual.
- **Right to data:** the right to access computerized personal information in a structured, commonly used technological format.

A request for access or rectification should be addressed to Brio EAP's Privacy Officer, whose contact information is indicated below.

The Privacy Officer will respond in writing to the request for access or rectification promptly and no later than thirty (30) days from the date of receipt of the request.

All refusals of Brio EAP to grant a request will be explained in writing and will indicate the provision of the law on which our refusal is based as well as the available recourses to contest and the time limit within which they must be exercised. Brio EAP also commits to assist you in understanding the refusal.

15. Limitation of liability

The use of technologies such as the Internet involves considerable risks. As a result, it is impossible to guarantee that the personal information you provide is completely secure. However, rest assured that Brio EAP uses all reasonable means at its disposal to protect your data.

Accordingly, you acknowledge that Brio EAP and its suppliers shall not be liable for any damages or injury that may arise or result, directly or indirectly, from a breach of confidentiality of data and/or information transmitted over the Internet to Brio PAE.

16. Transparency, concern and complaints

If you have any questions or concerns about this Privacy policy or our handling of your personal information, or to exercise your rights or make a complaint, please contact our Privacy Officer by e-mail at info@briopae.com.