

# CONFIDENTIALITY AND PRIVACY PROTECTION POLICY

Last updated: September 22, 2023

## 1. Policy Scope and Commitments

ITI Inc. and its direct and indirect wholly or partially owned subsidiaries (collectively referred to as “ITI”, “we”, “us” and “our”) are committed to respecting the privacy and personal information of every one of our current and potential customers (referred to as the “customer” or “you”). For the purposes of this policy, the term “customer” also refers to any person who visits our website and subscribes to our newsletter.

The purpose of this privacy policy is to inform our customers of the personal data and information we collect, how we intend to use the data and information collected, the site users’ rights and the site’s cookie policy.

This policy covers information related to our customers as set out in Section 2. This policy does not cover our practices related to the protection of personal information and client confidentiality as it pertains to the delivery of our services. These are detailed in the terms and conditions or any other service agreement entered into with our customers.

## 2. Personal Information Collected

### 2.1. Information collected directly from you

Our customers voluntarily provide us with certain information in connection with their customer account. This can include, for example, a name, an email address, a postal address, a phone number or any other information they decide to share with us.

### 2.2. Information collected from our website

When a user visits our website, we collect certain information to improve their experience. This can include, for example, referrals, their browsing history, their IP address and any other information collected using cookies. For more information on this, visit our website’s [Terms and conditions](#) page.

### 2.3. Information collected from other sources

We may also collect personal information about you when you:

- sign up for our newsletter,
- attend one of our training sessions or events,
- request additional information about our services,
- contact us directly.

## 3. Use of the Information Collected

We use your personal information for a variety of purposes, including:

- To identify you and confirm your identity,

- To assess whether our services correspond to your needs, interests and preferences,
- To develop, recommend, provide, execute, maintain, approve, improve and promote our services,
- To prevent, investigate and limit risks associated with fraud, cyberattacks and other similar events,
- As part of recruitment efforts.

## **4. Safety and Communication Measures**

Protecting your personal information is highly important to ITI. As a result, the information that we collect remains confidential and is held securely in an environment protected by ITI or a third-party service provider. ITI has put in place a number of industry-recognized safety procedures and measures.

Except as set out in this policy, ITI will not disclose your information for purposes other than those for which it was collected, unless we have your consent or are required to do so by law. However, ITI may use third-party suppliers or business partners to deliver on the aforementioned purposes. ITI may also be obliged to disclose your information if permitted or required to do so by law. ITI may also disclose your personal information in connection with a merger, a sale or a business transfer. You give ITI the permission to share your information for such situations.

ITI retains your personal information only for the purpose for which it was collected or as required by law.

## **5. Your Rights Regarding Your Personal Information**

Subject to applicable laws, you may consult and update the personal information we collected on you. To do so, send us a request using the details in the Contact us section below.

## **6. Policy Updates**

ITI may modify this policy at any time by updating its website's [Terms of use](#) page. Please consult the website occasionally to stay informed on the changes made to the policy.

## **7. Contact Us**

If you have any questions, concerns or complaints about our practices and the protection of your personal information, please contact us by email at [privacy@iti.ca](mailto:privacy@iti.ca) or at our mailing address below:

Privacy Officer  
1560, du Chinook street,  
Suite 218,  
Quebec, Quebec G2K 0M7