

## PRIVACY POLICY CANDIDATES

**Last update: December 15, 2023**

When you apply for a job with Congebec, you will be asked to provide us with personal information. Congebec is committed to ensuring the confidentiality of the personal information entrusted to it for this purpose by respecting the obligations set out at law and described in this policy.

"Congebec", "we", "us" and "our" refer to the Congebec group of companies, namely Congebec Logistic Inc., Congebec Inc. and Congebec (Transport) Inc.

Please read the Policy carefully. You may contact our Privacy Officer at the following address [infoconf@congebec.com](mailto:infoconf@congebec.com) if you have any questions about this policy and the processing of your personal information.

### COLLECTION METHOD

**Telephone and e-mail.** You can apply for a job by phone or e-mail. In addition, certain follow-ups will be carried out in this way, enabling us to gather additional information.

**Website.** Our website contains pages where you can provide your personal information to apply for a job.

**Service provider.** We may also use the services of a third party to manage job applications. You will then be redirected to the third party's website and the third party's privacy policy will apply to your job application made through the third party's services. For more information on the management of personal information by these third-party service providers, we refer you to their specific policies. Information transmitted to these third parties will then be redirected to us for processing of your application and will be handled in accordance with this policy.

### THE PERSONAL INFORMATION WE WILL NEED

**Required.** We limit our collection of personal information to that which is required for the purposes of your employment application with us. You will therefore be required to provide us with and keep up to date the following personal information:

- Your personal information: for example, surname, first name, gender, date of birth, address, e-mail address, telephone numbers, language of correspondence, languages spoken, nationality and country of residence;
- Your curriculum vitae and its contents, and all useful information for your recruitment;
- Your current and past compensation and benefits;
- Your job preferences;
- Your references; and
- Your personal identification numbers: for example, proof of citizenship, social insurance number and health insurance number.

**Created during the hiring process.** Some personal information will be created during your hiring process or obtained from third parties:

- Interview notes, including information about your previous jobs;
- Your image: for example, captured by videoconferencing technologies, if used, when participating in interviews ;
- Your criminal record;
- Criminal record checks, which may include a photograph and fingerprints;
- Trade sanctions: for example, we may verify whether you are a politically exposed person, a specially designated national or otherwise subject to sanctions under applicable laws and regulations; and
- Credit investigations for specific finance positions.

**Sensitive personal information.** As part of your job application, you may provide us with sensitive personal information, such as your race, union membership, criminal record, or health condition. If you provide sensitive personal information, you do so voluntarily and consent to our use of such information as described in this policy.

## **YOUR CONSENT**

**Implied Consent.** We require your consent to collect your personal information. If you choose to provide us with personal information, we will assume that you consent to our collection, use, disclosure, and retention of your personal information as described in this policy.

**Specific consent.** We will seek your specific consent for any collection, use or disclosure of your personal information that is not described in this policy.

**No consent required.** In certain limited circumstances, permitted by law, we may collect, use, or disclose personal information without your knowledge or consent. Such circumstances arise when, for legal, medical or security reasons, it is impossible or unlikely to obtain your consent.

**Withdrawing your consent.** You may withdraw your consent at any time. You must send your request to our Privacy Officer at the following address [infoconf@congebec.com](mailto:infoconf@congebec.com). We will inform you of the consequences of any withdrawal, including the possibility of your application being withdrawn. If you choose to withdraw your consent, your decision will be recorded in our files.

## **PURPOSES FOR WHICH WE COLLECT YOUR PERSONAL INFORMATION**

**General purposes.** We require your personal information for the following purposes:

- Communicating with you: sending you an acknowledgement of receipt, contacting you for interviews;
- Analyzing your application and assessing whether your qualifications match the job requirements;
- Following up on your application;
- Contacting your references;
- Carrying out the pre-employment process, if necessary, and preparing a job offer and sending it to you;
- Carrying out credit and criminal background checks; and
- Preparing an employment contract, if required.

**Statistical purposes.** We also use the personal information we obtain about you to generate statistics, compiling information about people who apply for jobs. When we collect information for these statistical purposes, your personal information will not be individually identifiable, but will be part of a whole composed of data from all our applicants or sub-groups.

**No other purposes.** We will not use your personal information for any other purpose. We do not sell, rent, or share your personal information for commercial or advertising purposes.

**Employment.** If you accept employment with us, the personal information provided in connection with the recruitment will be used in connection with that employment and its use and retention will be governed by the privacy policy applicable to employees.

### INTERNAL DISCLOSURE

Only those persons who need to know your personal information for the purposes covered by this policy have access to it. These persons are themselves required to keep your personal information confidential.

### DISCLOSURE TO THIRD PARTIES

Your personal information will not be disclosed to third parties other than:

- To our service providers and legal departments/agencies who are subject to legal and/or contractual confidentiality obligations, which include non-disclosure of personal information as described in this policy; or
- If required or authorized by law, for example to prevent an act of violence, or for study or research purposes; or
- If ordered by a competent court.

### CONSERVATION

**Statutory compliance.** All personal information we collect will be kept confidential in accordance with applicable privacy and data protection laws in the jurisdictions in which we do business.

**Retention schedules** We maintain record retention schedules to ensure that personal information is kept only as long as is reasonably necessary to fulfill the purposes for which it was collected or to meet statutory requirements.

**Security measures.** We take reasonable administrative, technical, and physical measures to protect your personal information from loss, theft and unauthorized access, use, alteration, and destruction, which may include:

- Physical security measures: locked filing cabinets, access cards to premises; and
- Technological security measures: passwords, access management systems, monitoring, and control to detect suspicious activity.

**Location.** All personal information we collect is kept in Canada.

**Duration.** Your personal information is retained only as long as necessary for the purposes for which it was collected or to comply with our legal and regulatory obligations. For example, in Canada, we are subject to various laws and regulations that provide for minimum retention

periods. Retention periods must also consider the exhaustion of potential recourses and limitation periods applicable in Canada. These periods may vary according to each situation, and we may retain your personal information after your employment has ended.

**Destruction or anonymization.** Once the retention period has expired, we will destroy or anonymize your personal information. When we destroy documents and data, we apply rigorous, safe, and secure procedures and ensure that only authorized personnel have access to the documents and data. When we anonymize your personal information, it will be for serious and legitimate purposes, or as required by law.

**Privacy Incidents.** We will inform you of any security incident, privacy incident or unauthorized disclosure of personal information that may cause you harm, in accordance with any applicable laws, regulations, or guidelines. In the event of a privacy incident, we will take reasonable steps to minimize the risk of harm to you and to prevent similar incidents in the future.

### ACCESS TO YOUR PERSONAL INFORMATION

**Access.** By law, you have the right to access your personal information and to obtain more specific information about the processing of your personal information.

**Corrections.** You may also request a correction if your personal information is out of date, inaccurate, incomplete, or ambiguous, or if the collection, disclosure, or retention of the information is not authorized by law. If you find any errors or inaccuracies, please let us know and we will make the necessary corrections.

**Requests.** Any request for access to your personal information or for more precise information or correction relating thereto:

- Must be sent in writing;
- Must be made to the Privacy Officer by e-mail at [infoconf@congebec.com](mailto:infoconf@congebec.com);
- Will be processed within 30 days of receipt. The application will be reviewed, and a decision based on its merits will be rendered;
- You will receive a written reply within this period. If the request is refused, we will explain the underlying reasons. A request may be refused for legitimate reasons provided by law, such as to protect the personal information of third parties; and
- If you are not satisfied with the response you receive from the Privacy Officer, you may request a review of the decision in accordance with the regulations applicable in your province.

### COMPLAINTS

**General.** Any complaints regarding the processing or protection of your personal information may be directed by e-mail to [infoconf@congebec.com](mailto:infoconf@congebec.com).

**Regulatory.** You can also file a complaint with the Access to Information Commissioner of Quebec or Alberta if you reside in one of these two provinces.