



Public Release

NOTARIUS™ PRIVACY POLICY

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By Notarius PPPI

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by writing to legal@notarius.com.

Opinions

By browsing our websites or using our products, you acknowledge that you have read and understood this Policy and consent to the processing of your Personal Information in accordance with this Policy, where applicable.

Governing Language

This English version is a translation of the original French. Should any discrepancy be found between the English and French versions of this Privacy Policy, the French version will prevail.

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1 Purpose and scope

Notarius' mission is to provide digital and electronic signature solutions that ensure the long-term reliability of documents. Information security is therefore at the heart of Notarius' activities.

We understand the importance you place on protecting your privacy and we are committed to maintaining the confidentiality of the Personal Information we collect about you during our activities in accordance with applicable laws. As such, Notarius is a "data controller". This means that we collect Personal Information directly from you and that we determine the purpose and means of "processing" this Personal Information.

"Processing" is a broad term that means the collection, use, storage, transfer, or other action related to your Personal Information; it is used in this Policy in this manner.

It is our responsibility to ensure that any Personal Information collected will be handled securely.

Our Privacy Policy informs you of our practices in this area. It explains why we collect it, how we handle it and how we protect it.

This Policy applies for as long as we hold your information, including after the end of our business relationship.

Please note that this Privacy Policy also applies to the Personal Information of our employees and other persons or organizations having a business relationship with Notarius.

THIS PRIVACY POLICY SUPPLEMENTS THE TERMS OF USE OF OUR PRODUCTS AND THE NOTARIUS CODE OF ETHICS AND CONDUCT, WHERE APPLICABLE.

Our General Manager is our Person in charge of the Protection of Personal information (hereinafter "PPPI"), responsible for ensuring compliance and implementation of legal requirements and compliance with this Policy. If you have any questions about this Policy, you may contact him at the address indicated in section 10 of the document.

2 Definition of Personal Information

In Quebec, under the terms of the *Act respecting the protection of personal information in the private sector (CQLR., c. P-39.1)*, personal information is now: "**Any information which relates to a natural person and allows that person to be identified**".

Personal Information may, alone or in combination with other information, directly or indirectly allow you to be identified.

It is possible that some of the Information that we classify as Personal Information for the purposes of this Policy may not be protected by applicable laws, in which case you may not have the same rights with respect to it.

Personal Information may include information collected about you using cookies or other technologies. Cookies are small pieces of information stored in a browser or device when you visit a Web site, which remember your preferences or information about you.

The types of Personal Information we may collect from time to time may include your last name, first name, contact information (mailing address, telephone number or personal e-mail address), date of birth, professional membership number, photograph, and any other Personally Identifiable Information ("Personal Information").

We are responsible for Personal Information in our possession or custody, as well as for Personal Information transferred to a third party for processing.

Wherever possible, we will anonymize, pseudonymize and/or aggregate these so that they no longer identify an individual.

Our Privacy Officer (PPPI) is responsible for ensuring that we comply with this Policy and applicable privacy laws.

3 Collection, Use, Disclosure and Retention of Personal Information

Notarius limits the personal information it collects to that which it needs for the defined purposes and uses it only for those purposes.

If we want to use personal information for a new purpose, we will describe the intended use and ask for your consent again.

Notarius will not use Personal Information for purposes other than those for which it was collected, unless the Person concerned has again consented, unless:

- a) reasons of a legal, medical or safety nature make it impossible to obtain consent; or
- b) Notarius is authorized or required to do so under applicable law.

If a purchaser decides to proceed with the purchase of products on the Notarius Web site for a future Holder, the Personal Information collected by the purchaser must have been collected by lawful means and solely for the purposes identified prior to collection. The Holder must have given his or her prior consent. Such consent must be expressly given in the case of sensitive Personal Information.

In general, if you provide us with Personal Information about anyone other than yourself, such as your employees, third parties, advisors, or suppliers, you must ensure that they understand how their Personal Information will be used, and that they have given you permission to disclose it to us and to allow us and our suppliers to use it.

3.1 Examples of Personal Information we may collect

We collect information that is sent to us voluntarily, through the interface of our websites (for example by filling in a form) or otherwise (for example by e-mail or post).

This information may include the following:

- Full name;
- Email address;
- Phone number;
- Physical address;
- Country, province or state of residence;
- Profession;
- Membership number of a professional order or association;
- Any information transmitted to Notarius through our Web sites, by e-mail, telephone, chat or during the identity verification process.

3.2 How we collect your Personal Information

We may collect information from your mobile and online activities, such as Internet protocol addresses (IP addresses) to determine your geographic location, mobile device identification numbers, the name of your cellular service provider, and information about your use of the site, applications, and websites. We use cookies (small files that a Web site server uploads to your computer) on our Web site to collect information about your online behavior. You can set your browser to refuse these files, but this may affect our ability to personalize or test your online experience. For example, they allow us to remember certain elements, such as your preferred language.

We may collect the Personal Information you provide to us when you visit our website or use our applications, register for or request one of our Products, interact with us through social media or online advertising, participate in surveys or otherwise interact with us.

Notarius is particularly attentive to the need to preserve the confidentiality of the Personal Information of users who visit its websites (notably [notarius.com](https://www.notarius.com), [consignocloud.com](https://www.consignocloud.com), [consigno.com](https://www.consigno.com) and [verifio.com](https://www.verifio.com)). For this reason, although the servers that host these sites identify the Internet Protocol (IP) address of your connection, the information that may be transmitted between computers to conduct site operations does not identify you personally.

Personal Information may be collected if, from our websites:

- You voluntarily subscribe to a specific product or service that requires you to provide such information.
- You fill in a support or information request form on one of our sites.

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- You access one of the features of your online (self-service) account at <https://certifio.notarius.com/> or https://*.consigno.com/#/login for the ConsignO Cloud product.

Such Information may also be collected from time to time by our employees when, for example, you verify your identity with our identity verification agent or communicate with our customer service department by telephone or chat, as the case may be.

We have implemented strict technical and organizational procedures to ensure that, by default, we only process Personal Information that is necessary for each specific purpose of processing. These procedures prevent the loss, unauthorized use, or access of your Personal Information.

Notarius collects this personal information only if you voluntarily choose to provide it.

Mailing lists and e-mails: Notarius uses HubSpot and Amazon SES to manage its mailing lists and send various e-mails (collectively the "Messaging Service Providers") to its clients and prospects. Personal Information is transferred to the Messaging Service Providers to manage the mailing lists and to properly send e-mails as required. Your Personal Information is used solely for the purpose of sending e-mails; Messaging Service Providers do not use your Personal Information for any other purpose and do not transfer or sell your Personal Information to any other third party.

You may unsubscribe from Notarius mailing lists at any time by following the link at the bottom of Notarius emails.

Notarius' email practices are designed to comply with anti-spam laws, including, but not limited to, Canada's Anti-Spam Act (S.C. 2010, c. 23). If you believe that you have received an e-mail in violation of these laws, please contact our Privacy Officer using the contact information below.

3.3 How we use your Personal Information

Notarius collects only the Personal Information required to offer you the products you have purchased and to improve them as needed. Notarius may, however, use your personal information to meet its legal obligations.

We may use Personal Information in any of the ways set out below, with your consent or, where applicable, under another legal basis. In each case, we indicate the purposes for which we use your Personal Information:

- In order to provide our services as well as for the conduct of our business, to administer and perform our services, including to perform our obligations arising from any agreement between you and us. For example:
 - Create and maintain your customer account;
 - Verify your identity ;

- Provide the product, service or information you requested;
 - Notify us of updates, interventions or renewals of your digital signature certificates;
 - Providing customer service ;
 - To send you information about products and services you request and to respond to your requests and questions.
- To respond to inquiries or other requests from visitors to our Web sites.
 - In order to facilitate the use of our websites and to ensure that the content is relevant, and to ensure that the content of our websites is presented in the most effective manner for you and your device.
 - For marketing purposes (informing you of new offers and promotions) and business development - to provide details of new services, information on product developments and invitations to seminars, demonstrations and events where a person has opted to receive such information. You may request that this service cease at any time.
 - For research and development purposes (including security) - to perform analyses to better understand our customers' service and marketing requirements and to better understand our business and develop our services and offers. You may unsubscribe at any time.
 - Recruitment purposes - to enable us to process job applications and assess whether an individual meets the requirements of the position for which they may apply at Notarius.
 - To meet our legal, regulatory or risk management obligations.
 - To ensure we get paid - to collect payments owed to us and, where appropriate, to enforce such collections through debt collection agencies or other legal means (including legal proceedings).
 - In order to reorganize or change our business - if we undertake a reorganization (for example, by merging, consolidating or divesting part of our business), we may need to transfer some or all of the Personal Information to an applicable third party (or its advisors) as part of any due diligence process or transfer to such reorganized entity or third party for the same purposes as set out in this Policy or for the purposes of analyzing any proposed reorganization.

3.4 To whom we may communicate your Personal Information

We may share your Personal Information with our service providers and our majority shareholder.

We may also disclose them to meet a legal obligation or to enforce our rights.

Under no circumstances will personal information collected by Notarius be sold to other persons or organizations.

We may also share Personal Information with certain third parties, including the following:

- third-party service providers and/or partners who provide us with website services, application development, hosting, maintenance, and other services. These third parties may access or process Personal Information in connection with the services they provide to us. We limit the Personal Information we provide to these service providers to that which is

reasonably necessary for them to perform their functions. We invite you to consult the privacy policies of these suppliers.

- government authorities and law enforcement agencies where required by applicable law. More specifically, we may disclose Personal Information and other information if we are required to do so by law or if we believe in good faith that such disclosure is necessary to comply with applicable laws, in response to a court order or subpoena or government search warrant, or otherwise to cooperate with such government authorities and law enforcement agencies.
- The purchaser, successor, or assignee in connection with any merger, acquisition, debt financing, asset sale or similar transaction, and in the event of any insolvency, bankruptcy or receivership involving the transfer of Personal Information as a business asset to one or more third parties.

We will only use your Personal Information for the primary purpose and applicable legitimate purpose for which it was collected, or for purposes consistent with that primary purpose.

3.5 How long do we keep your Personal Information

Notarius retains the Personal Information it collects for as long as is necessary to conduct its business and fulfill the identified purposes, and for as long as it is reasonable to do so for customer service, legal or commercial purposes.

The length of retention depends on the product, service and nature of the Personal Information. At the end of this period, Personal Information will be destroyed, erased or depersonalized.

Notarius makes no commitment to retain the Information collected for a specific period of time, except where required by applicable law or regulation.

Depending on whether or not you are one of our customers, your Personal Information may be stored on our servers located in Quebec or with some of our service providers outside Quebec. For example, when a potential customer completes an online sales request on our public Web site, we deal with an external service provider who stores this Personal Information outside Quebec. At the same time, we take steps (privacy impact assessments or risk assessments) to ensure that such external service providers have security measures in place to reasonably protect the Personal Information they collect.

When you provide us with your Personal Information in order to apply for an [employment opportunity](#) including, but not limited to, your resume, we will treat such Personal Information on a confidential basis and use such information solely (i) to evaluate your candidacy for current or future employment opportunities and (ii) to contact you regarding such employment opportunities. We will preserve your Personal Information for future employment opportunities with Notarius that may arise unless you inform us not to preserve your information.

If you choose to voluntarily transmit your Personal Information to us by e-mail or by means of an unsecured digital form, please be aware that, at the time of transmission, we cannot guarantee its protection, integrity, or confidentiality.

When you **verify your identity** face-to-face with an agent, using the point-to-point security videoconferencing service, from a camera-equipped smartphone or from a computer equipped with a webcam, we will treat such Personal Information as confidential and use it only for the purposes for which it is intended. Recordings and images collected in this way are encrypted, stored in a restricted-access environment accessible only to a select group of employees, and retained in accordance with our internal retention schedule.

When you **speak** with our customer service agents over the telephone, your calls may be recorded and monitored for quality assurance and training purposes. We will treat any Personal Information you may give us during a call on a confidential basis and use it only for the purposes for which it is intended. It is important to note that some calls may be used as evidence, for example, in access to information requests by the Syndic of the Holder's professional order.

4 Consent

In compliance with the law applicable in Quebec, your consent must be manifest, free, informed and given for specific purposes. Your consent will be requested for each of these purposes, in clear and simple terms. Your consent will be valid only for the time required to achieve the purposes for which it was requested.

We therefore undertake to obtain your consent prior to collecting your Personal Information when required by law. Such consent may be express or implied and may be provided directly by the individual or by his or her authorized representative.

We prefer to obtain express consent, whether verbally, electronically or in writing. However, implied consent may be reasonably inferred from a person's action or inaction. For example, providing a name and address to receive a publication, or a name and telephone number to obtain an answer to a question, is considered implied consent to the collection of information containing Personal Information. In determining the appropriate type of consent, we take into account the sensitivity of the Personal Information involved, the purposes for which it is collected and the reasonable expectations of a similarly situated individual.

When your request for consent is made in writing, it will be presented separately from any other information you may receive.

By applying for a product, contacting us or otherwise providing us with Personal Information, you acknowledge that you consent to the collection, use and disclosure of your Personal Information as described in this Policy and applicable laws.

You may be asked for consent on one or more occasions during the identity verification process, and in various forms, such as a checkbox or a recorded oral statement.

When you provide us with Personal Information about another person, we assume that you have obtained that person's valid consent to allow us to collect, use and disclose that information in accordance with this Privacy Policy.

Subject to legal and contractual restrictions, you may suspend or withdraw your consent to the collection, use and disclosure of your Personal Information.

However, depending on the circumstances, withdrawing your consent in its entirety may prevent us from continuing to provide you with the products and services you have requested.

5 Protecting your privacy

Notarius uses procedures and practices appropriate to the level of confidentiality of Personal Information to prevent loss, theft, and unauthorized access. Access to your information is limited to those individuals and parties who need it. Although it is impossible to guarantee 100% protection, Notarius has adopted rigorous methods that meet strict security standards to ensure the protection of personal information.

For example, we use physical safeguards (such as restricted access to our offices and secure storage space), electronic safeguards (such as passwords and encryption) and secure business practices (such as customer authentication on telephone calls). We also train our staff on how to protect Personal Information.

Despite the efforts and protective measures taken by Notarius, complete confidentiality and security cannot yet be guaranteed on the Internet. Any unencrypted electronic communication transmitted over the Internet is neither secure nor confidential and is subject to possible interception, loss, or alteration. You acknowledge that such communications are at your own risk.

6 Information collected automatically

Notarius automatically collects certain information using "Third Party Analytics Programs" such as Google Analytics and HubSpot to help us better understand visitors and users of our Websites and how they use them, but none of this information identifies you personally except by an alphanumeric string.

For example, each time you visit our Website, we automatically collect (where applicable) your IP address, browser and computer/device type, access times, the web page you came from, the web page(s) or content you access, and other related information.

We use the information collected in this way solely to better understand your needs and those of visitors and users of the Websites as a whole. Notarius also uses the information collected for statistical purposes to track the number of visits to the Websites, specific pages of the Websites and users in order to make improvements to the Websites and our marketing activities.

Your IP address and other relevant information that we collect using third-party Analysis Programs may be used to trace any fraudulent or criminal activity, or any activity in violation of the Notarius Web Sites Terms of Use.

6.1 Cookies

Although you can visit our Web site without revealing any Personal Information about yourself, when you access our Web sites an exchange of information takes place automatically between your computer and our Sites. This exchange of information does not allow Notarius to identify you personally or to know your name or e-mail address. However, as indicated above, this exchange of information does allow Notarius to obtain your IP address, the type of browser and operating system used, the date and time you accessed the site, the pages visited and, if applicable, the address of the referring site.

It is through the use of cookies that the operating systems of Notarius websites can automatically collect this information about your visit. Cookies are text files of negligible size that are transmitted to your browser when you access a Web site.

When you visit one of our websites, information may be stored in or retrieved from your browser, usually in the form of cookies. This information may relate to you, your preferences or your device and is mainly used to ensure that the website functions correctly. The information generally does not identify you directly but may enable you to benefit from a personalized web experience. Because we respect your right to privacy, we give you the option of not allowing certain types of cookies. However, if you block certain types of cookies, your browsing experience, and the services we are able to offer you may be affected.

6.1.1 The different types of cookies at Notarius

6.1.1.1 Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

6.1.1.2 Functional Cookies

These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, then some or all of these services may not function properly.

6.1.1.3 Performance Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

In particular, the following information is collected:

- your IP address ;
- your geographical location (region derived from your IP address) ;
- your Internet service provider ;
- day and time of visit ;
- the domain of the previous site visited ;
- the URL address and titles of pages visited on our websites;
- your activities (clicks, screen scrolling, etc.) on our Web sites;
- the point of origin of your visit (banner, e-mail, social network, advertiser's website);
- the type of customer to which you belong (individual, group, organization, etc.);
- your searches using the tool integrated into our sites.

6.1.1.4 Targeting Cookies

With your permission, these cookies may be placed on our website by our advertising partners. These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

These cookies may allow us to:

- to adapt the content displayed on your device in our advertising spaces according to the information you have given us;
- benefit from our personalized advice and offers tailored to your point of origin (for example, if you come from a partner site);
- adapt our advertising spaces to the display characteristics of your device (language used, display resolution, operating system, etc.);
- to adapt the content displayed on your device in our advertising spaces, according to the browsing history of your device on our site;

- adapt the content displayed on your device in our advertising spaces according to your location data.

6.1.2 How you can manage cookies in general

We invite you to visit the following web pages:

- [Deleting and managing cookies in the Internet](#)
- [Enable or disable cookies in Chrome.](#)
- [Allowing and blocking cookies in Firefox.](#)
- [Delete Safari history and cookies on your iPhone, iPad or iPod touch.](#)
- [Delete your history and activity on Android.](#)

6.2 Chat

Notarius makes chat rooms available to you. Please note that your voluntary disclosure of Personal Information to these chat rooms is not governed by this Privacy Policy.

No confidential information should be transmitted via this communication channel. Consequently, Notarius is not responsible for any information communicated via these chat rooms, and such voluntary communications are of a public nature and at your own risk.

6.3 Social platforms

We collect information transmitted by social networking sites or applications (e.g., LinkedIn and YouTube) when a visitor interacts with profiles owned or controlled by Notarius on these social networking platforms. These sites or applications are governed by their own policies relating to your personal information, which may differ from ours and may also be applicable.

If you choose to interact with us through these social media channels, you should first read the terms of service and privacy policies of these third-party service providers and the applications used to access them.

6.4 Hyperlinks

Notarius websites may contain hyperlinks enabling users to visit other sites operated by other companies or groups of professionals, for example ("third-party sites").

By clicking on these hyperlinks, you will leave our Web sites for those of third parties, which may have different privacy policies and practices. This Privacy Policy no longer applies when you leave our website. Please consult the privacy policies of these other entities before providing any Personal Information to their sites. These links are provided for user convenience only. Notarius does not control, endorse or guarantee in any way the sites linked to this gateway and Notarius cannot be held

responsible for the content of these other sites or for the practices of their operators, particularly with regard to the protection of your Personal Information and respect for privacy.

7 Special case of payment information

Please note that in some areas of our Web site, you may be asked to provide **credit card** information to **make a purchase**. Your online transactions are secure. As a customer, you will be redirected to a secure payment platform. The information you provide to make a payment, including your full credit card number, will never be transmitted to Notarius, even in the case of pre-approved payments. If your payment is not pre-approved or if the transaction fails, you will be invited to redo the payment process and will be redirected to the aforementioned secure payment platform. This secure payment platform complies with the Payment Card Industry Data Security Standard (PCI DSS). Your transactions are always routed, processed, and stored securely by the platform manager. However, Notarius retains your transaction confirmation number and the last 4 digits of your credit card number for accounting purposes. This information is kept in your customer file.

8 Security

Notarius has adopted this Privacy Policy in order to comply with the requirements of ISO 27001, eIDAS and new Quebec legal obligations.

Notarius therefore implements measures to ensure the protection of the Personal Information in its custody against theft, loss, unauthorized access, use or disclosure by means of reasonable technical, administrative or physical security measures, taking into account, in particular, the sensitivity of the information, the purpose for which it is to be used, its quantity, distribution and medium.

Thus, among other things, when deemed appropriate, Notarius uses encryption and/or authentication tools, as well as other methods to protect certain Personal Information stored on its servers.

In particular, Personal Information collected is handled in accordance with our information security policy. All Notarius employees agree in writing to abide by this policy, and access to documents of a personal nature is restricted to authorized employees only.

Notarius periodically reviews its policies and adopts additional security parameters in line with technological developments, new threats and its own capabilities.

Notwithstanding the foregoing, complete confidentiality and security cannot yet be guaranteed over the Internet. Any unencrypted electronic communication transmitted over the Internet is neither secure nor confidential, and is subject to interception, loss or alteration.

You acknowledge and agree that Notarius, its officers and employees are not responsible and shall not be liable to you or any third party for any damages of any kind, whether direct or indirect,

incidental, special or consequential, resulting from the transmission of confidential information or Personal Information via the Internet and that such communications are at your own risk.

Finally, we also have procedures in place to deal with any suspected breach of security of Personal Information. We will notify you and any applicable supervisory authority of a suspected breach of security of Personal Information when we are required to do so by Law, and within the time limits required by such Law, if any.

9 Accuracy and updating of Personal Information

Notarius ensures that all personal information in its possession is as accurate, current and complete as necessary for the purposes for which it is to be used.

If you are one of our customers, some of the Personal Information we hold about you is accessible through your portal and can be modified by logging in to your portal. To help us ensure that your Personal Information is accurate and up-to-date, please access "My Account" at <https://certifio.notarius.com/certifio/secure/account> or <https://cloud.consigno.com/#/login> and update your Personal Information.

We make reasonable efforts to ensure that your Personal Information remains accurate, complete and as up-to-date as possible. You have the right to request access to your Personal Information for verification purposes and to request a correction if your Personal Information is inaccurate. If you believe that your Personal Information is inaccurate, or if you wish to have access to your Personal Information, you may make a request using the contact information provided in section 10 of this Policy.

10 Contact our Privacy Officer

Notarius is responsible for the processing of Personal Information in its custody and control and has designated an internal Privacy Officer, our Privacy Officer, who oversees its compliance with the Privacy Policy and applicable privacy laws.

If you believe that we are holding inaccurate, incomplete, or misleading Personal Information about you, you have the right to request that this information be rectified by emailing your request to dpo@notarius.com.

You can also contact us by mail at the following address:

Solutions Notarius Inc.
c/o Privacy Officer
465 McGill, Suite 300
Montréal (Québec) H2Y 2H1

You must provide proof of your identity, including your name and contact details, the nature of your request, the name of the product or person you have already contacted, and any other relevant information.

We will respond to any written request within 30 days of receipt, whenever possible. We will provide reasonable access to the individual's personal information in our files in accordance with applicable laws and regulations. Fees may apply in certain cases.

We may verify the identity of the person seeking access to his or her Personal Information. Information provided for such verification will not be recorded or used for any other purpose.

We will give reasons for any refusal to grant your request, including the legal provision we are relying on.

11 Legal framework of the Privacy Policy

The processing of Personal Information is governed by laws applicable in different jurisdictions.

This Policy and all related transactions shall be governed by and construed in accordance with the laws of Quebec, including:

- *Civil Code of Quebec* (L.Q., 1991, c.64), in particular articles 36 and 37, which deal respectively with respect for privacy and communication of confidential information;
- *Act to establish a legal framework for information technology* (CQLR, c. C-1.1);
- *Act respecting the protection of personal information in the private sector* (CQLR., c. P-39.1)

Legal requirements to apply from September 22, 2023

In accordance with the new Quebec legal requirements applicable on September 22, 2023, Notarius undertakes (if applicable in its business context) to:

- Establish and implement proportionate policies and practices, approved by the DPO, governing the governance of Personal Information, and publish detailed information about them in simple, clear terms on the company's website.
 - provide a framework for the retention and destruction of such information.
 - define the roles and responsibilities of its staff throughout the information life cycle.
 - provide a process for handling complaints about the protection of this information.
- Respect the new rules governing consent to the collection, communication, or use of Personal Information.

- Destroy Personal Information when the purpose for which it was collected has been fulfilled or anonymize it to use it for serious and legitimate purposes, subject to the conditions and retention period stipulated by law.
- Comply with new transparency obligations such as:
 - publish a plain-language privacy policy if you collect Personal Information through technology, and notify individuals of any updates;
 - inform the data subject when a decision is based exclusively on automated processing;
 - to inform the individual when identification, location or profiling technology is used and of the means available to activate these functions.
- Comply with the new rules governing the communication of Personal Information without the consent of the person concerned (exercise of a mandate or performance of a service or business contract).
- Conduct a Privacy Impact Assessment (PIA) when required by law, for example before disclosing Personal Information outside Quebec, taking the following into account:
 - intelligence sensitivity;
 - the purpose of its use;
 - protection measures, including contractual ones, from which the intelligence would benefit;
 - the legal regime applicable in the country where this information would be communicated, the principles of protection of Personal Information applicable there.
- Respect the new rules governing the use of Personal Information.
- Set the default parameters to ensure the highest level of confidentiality for the technological product or service offered to the public.
- Respect the right to cease distribution, reindex or deindex (or the right to be forgotten).
- Respect the new rules for communicating personal information to facilitate the grieving process.
- Respect the new rules surrounding the collection of Personal Information concerning a minor, if applicable.

12 Changes to and validity of the Privacy Policy

Notarius reserves the right to modify this Privacy Policy at any time.

All changes will be posted on the Notarius websites and will take effect immediately upon posting.

We will take reasonable steps, if necessary, to inform affected individuals of any material changes.

Please check this Policy periodically for changes. You will be deemed to have accepted changes to this Policy if you continue to provide us with Personal Information after changes are posted.

This document is reviewed annually or in the event of major changes.

All changes leading to the publication of an official version signed by the Notarius CEO and posted on the corporate network must be approved in advance by the Notarius PPPI.