

Personal Information Governance Policy

Section 3.2 of the *Act respecting the protection of personal information in the private sector*

Importations Thibault attaches great importance to protecting the personal information it receives in the course of its business.

The purpose of this governance policy with regard to personal information is to meet the requirements of applicable laws on the protection of personal information and respect for privacy.

1. Definitions

CAI - The Commission d'accès à l'information du Québec, an administrative body responsible for applying laws on access to information and the protection of personal information.

Confidentiality incident - The unauthorized access, use or disclosure of personal information. It may also involve the loss or any other breach of the protection of personal information.

Act respecting the private sector - *Act respecting the protection of personal information in the private sector*, chapter P-39.1.

Personal information - Personal information is any information about an individual that directly or indirectly allows that individual to be identified.

Sensitive personal information - Personal information is sensitive when, because of its medical, biometric or other intimate nature, or because of the context in which it is used or disclosed, it gives rise to a high degree of reasonable invasion of privacy.

2. Collection of personal information

Importations Thibault Ltd. may collect personal information that is necessary for the accomplishment of its mission, which is to import and distribute parts and accessories for powersports.

Importations Thibault Ltd. will only collect personal information that is necessary for the identified purposes. All personal information will be collected in accordance with the law. Furthermore, Importations Thibault Ltd. will hold, protect and destroy personal information in accordance with the law and best practices.

3. Consent

Personal information may only be used for the purposes for which it was collected. If personal information is to be used for other purposes, the person concerned must give his or her consent.

Consent does not need to be in writing, however, when the situation requires it, notably because of the sensitivity of the information collected, Importations Thibault Ltd. may use a written consent form.

Certain personal information may also be required to identify visitors to the corporate website. Visitors to the website may modify their browser preferences at any time.

4. Retention and destruction of personal information

Importations Thibault Ltd. will keep the personal information collected securely and only for as long as is necessary to fulfill its obligations.

When personal information is no longer relevant to a file, Importations Thibault Ltd. will securely destroy the information. However, Importations Thibault Ltd. may also make the information anonymous, by removing any information that could identify a person, if it wishes to retain information for other purposes.

5. Staff roles and responsibilities

Importations Thibault Ltd. employees will ensure that personal information is collected, stored, used and destroyed according to best practices. When a probable, apprehended or proven confidentiality incident is brought to the attention of a member of the organization, he or she will contact the person responsible for the protection of personal information.

Importations Thibault ensures that access to personal information is limited only to personnel who need it to perform their duties.

6. Incidents and incident log

When Importations Thibault Ltd. has reason to believe that a confidentiality incident involving one or more of the personal information it holds has occurred, it must take measures to reduce the risk of harm being caused and to prevent further incidents of the same nature from occurring, in addition to notifying the CAI and the person concerned in accordance with the Act.

The assessment of the risk of prejudice is done in consultation and takes into account the sensitivity of the information concerned, the apprehended consequences of its use and the likelihood that it will be used for prejudicial purposes.

Importations Thibault Ltd. must keep a register of confidentiality incidents in accordance with the Private Sector Act and its regulations. At the request of the CAI, a copy of this register will be sent to the CAI.

7. Person responsible for the protection of personal information

The person responsible for the protection of personal information shall ensure compliance with and application of the laws on the protection of personal information and this policy.

The person responsible for the protection of personal information receives requests for access to information and complaints relating to the protection of such information.

The person responsible ensures that this policy is disseminated and implemented. He or she will also monitor legislative changes and update the policy as necessary.

8. Access to personal information and complaints process

To request access to, correction of or deletion of personal information, a written request should be sent to Ms. Karine Boisvert, Director of Human Resources, at the following address:

165 Sauvé Street
Sherbrooke, Qc
J1L 1L6

Or by e-mail: rh@importationsthibault.com

A reply will be sent within thirty (30) days of the date of receipt of the request.

When such a complaint is lodged, she takes note of its contents, investigates the circumstances and responds in writing. She will work with other key people in the organization to ensure organizational consistency and a multidisciplinary analysis to ensure that the analysis process is effective.