



## PERSONAL INFORMATION PRIVACY POLICY

### ***Introduction***

ACIER OUELLETTE is subject to federal and provincial privacy legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA) and the Québec Act respecting the protection of personal information in the private sector (Bill 25). ACIER OUELLETTE takes all issues relating to confidentiality very seriously and has adopted policies and procedures to comply with these laws.

### ***What information do we collect?***

ACIER OUELLETTE collects information on its website in two ways:

Directly: when you provide your information by subscribing to our newsletter or when you fill in other forms on our website.

Indirectly: activities on our website such as browsing and cannot be associated with any person. This information is stored and used for technical and statistical purposes. It is used to count the number of visits, the most frequently visited pages, the technology used by visitors, the referring sites, and the country of origin of visitors. The information exchanged is as follows:

- The domain name of your Internet service provider.
- Your IP address.
- The type of browser (Chrome, Firefox, etc.) and operating system (Windows, Mac OS, etc.) used.
- Date and time of visit.
- The pages you visit.
- The address of the referring site if you are accessing the ACIER OUELLETTE site from another site.

### ***Why do we use your information?***

The information you have provided may be used for:

- Improve our website offers.
- Send periodic e-mails.
- Customize your experience to best suit your needs.
- Provide information or resources you have requested.
- Improve customer service.
- Prevent potentially prohibited or illegal activities for security purposes.

### ***How do we protect your information?***

The personal information we collect is kept in a secure environment. People working for us are required to respect the confidentiality of your information. To ensure the security of your personal information, we use the following electronic and physical measures:

- Encrypted communications using the TLS protocol.
- Access management - authorized person.
- Access management - person concerned.
- Network monitoring software.
- Anti-virus and anti-malware.
- Computer backup.
- Passwords and multi-factor authentication.
- Firewall.
- Access codes to premises.
- Security personnel.

- Surveillance cameras.

In addition, our policies, procedures, and code of ethics are clearly communicated to our staff and consultants, and we ensure that they are respected and adhered to.

### ***Using Google Analytics***

The ACIEROUELLETTE.com website uses Google Analytics, a web analytics tool. Google Analytics uses "cookies" to collect information about your use of this website, which is stored on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

The information collected by the tool includes, for example, the pages you visit, the date, time, duration and frequency of your visits, and the links you click on. Your computer's operating system type and language, the name of your Internet service provider and your geographical location (region) are also part of the information collected. Your IP address is also collected, but anonymized (truncated) to ensure the confidentiality of your information. Anonymizing an IP address prevents it from being used to identify an Internet user.

Google will only use the information collected to produce statistics and reports on the navigation of this site, which will enable the government to improve its electronic service provision. Google will not, under any circumstances, link the information collected on this site with any other data held by Google. If you wish, you can prevent Google from recording information about your navigation by installing the Google Analytics deactivation browser add-on on your computer.

### ***Do we disclose information to third parties?***

ACIER OUELLETTE does not sell, trade or transfer your personal information to third parties. We may disclose your information to trusted business partners when required to provide the services we contract with you, as long as they agree to keep the information confidential.

### ***Third-party links***

The ACIER OUELLETTE website may contain links to third-party websites. Our privacy policy is in no way linked to that of third-party websites.

### ***Compliance with the Children's Privacy Protection Act***

ACIER OUELLETTE complies with COPPA. Our website is intended for people aged 13 and over.

### ***Your consent***

By using our website, you agree to our privacy policy. You can update your preferences or unsubscribe from our newsletter at any time via e-mail [prp@acierouellette.com](mailto:prp@acierouellette.com)

### ***Responses to job offers and unsolicited applications.***

We keep the documents sent by candidates (CV, cover letter, etc.) for a maximum of 3 years. Documents are then securely destroyed.

### ***Changes to the privacy policy***

ACIER OUELLETTE reserves the right to change this Privacy Policy and related procedures at any time without notice. Changes will be posted on this Web site and will be effective when posted. Your use of the Web site following such modifications constitutes your agreement to be bound by this policy as modified or amended. For this reason, we encourage you to review this policy each time you use the Web site, especially when you provide Personal Information. This Privacy Policy was last modified on 14 august 2013.

**Contact us**

If you have any questions about our privacy policy, you can contact us at [prp@acierouellette.com](mailto:prp@acierouellette.com).

**Privacy Officer**

If you have a question, a concern or a complaint to make regarding the processing of your personal information, you can contact the Personal Information Protection Officer, Mr. Jérôme Côté, Human Resources Director by email [auprp@acierouellette.com](mailto:auprp@acierouellette.com) or by telephone at 450-432-2344

You must indicate your name and contact details, the nature of your request, the name of the service or person with whom you have already communicated and any relevant information.