

	Creation Date : September 14th, 2023
	Revision Date : August 24th, 2026
	Service : Human Ressources
	PROTECTION OF PERSONAL INFORMATION POLICY

1. PURPOSE OF THE POLICY

To adequately protect personal information, BDM + Furniture Inc. has implemented this privacy governance policy in accordance with the provincial and federal laws applicable in the province of Quebec, particularly the Act respecting the protection of personal information in the private sector (Act respecting the protection of personal information in the private sector (RLRQ c P-39.1)).

This Privacy Policy (the "Policy") records the statement that BDM Furniture + Inc. has put in place to protect the personal information of customers, employees, partners and users of the websites, applications, and all other channels in which BDM Furniture + Inc. collects and uses personal information.

This Policy not only meets the requirements of the Act respecting the protection of personal information in the private sector, but also describes the standards for the collection, use, communication, and retention of personal information held by BDM Furniture + Inc. as part of its commitments.

All references in this Policy to the "Website" or "Websites" in the present policy refers to the following websites divided by product brand; www.bdmfurniture.com , www.bermex.ca, www.bertanie.com , www.dinec.com, www.meubles2go.com as well as all other websites developed and provided by BDM+ Furniture Inc.

2. EXTENDED

All employees, representatives, or directors of BDM+ Furniture Inc. who collects, uses, or communicates personal information are required to comply with this policy. Failure to comply with this policy may result in significant disciplinary action depending on the negligent or intentional nature of the fault.

3. PERSONAL INFORMATION

Personal information is any information that relates to a physical person and allows that person to be identified directly or indirectly. Personal information does not include information that cannot be attributed to or identified with an individual, such as aggregate information that does not relate to an individual or depersonalized information.

4. COLLECTION OF PERSONAL INFORMATION

During its day-to-day operations, BDM + Furniture Inc. collects certain personal information from its partners in various ways through various interventions with its customers and business partners, such as first name, last name, mailing address, telephone number, e-mail, payment information, contact information, IP address and others (via websites).

For employees, personal information may include date of birth, social insurance number, family status, driver's license number, work permit number, permanent residence number, bank account number, marital status.

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5. PROTECTION OF PERSONAL INFORMATION

Personal information must be protected regardless of the nature of its medium or form; written, graphic, sound, visual, computerized, or other.

Subject to applicable laws, BDM + Furniture inc. undertakes to adopt security measures to ensure the protection of personal information collected, used, communicated, stored or destroyed, to ensure its integrity and to use personal information only for reasons related to the business relationship between BDM + Furniture inc. and its client, employees, partners or users of websites owned by BDM + Furniture inc..

These measures are reasonable considering, among other things, the sensitivity, purpose, quantity distribution and medium of the personal information.

As required by the Privacy Act, BDM + Furniture Inc. will take reasonable steps to prevent unauthorized access, use or disclosure of your personal information. Against unauthorized access, use or reproduction, to prevent incidents from occurring, to reduce the risk of harm to individuals, and to protect personal data against unauthorized access, use or disclosure using physical, technical, and administrative security measures.

At all times, employees who encounter personal information must take appropriate security measures to ensure its protection. BDM + Furniture Inc. expects its employees, representatives, and directors to be transparent and accountable by transparency and accountability by reporting to their manager and to the designated appointed Privacy Officer, any breach of privacy obligations. obligations with respect to the protection of personal information.

6. CONSENT TO PERSONAL INFORMATION

BDM + Furniture Inc. will ensure, in accordance with applicable legislation, that it obtains the authorization of its clients, partners, employees and users of websites owned by BDM + Furniture Inc. before collecting personal information about them.

If BDM + Furniture Inc. does not obtain authorization to collect personal data, we undertake not to collect such data.

Once you have given your consent to the use of your personal information, you, as a client, partner, employee, or user of the website, must ensure that you inform BDM + Furniture INC. of any changes to keep your information up to date.

Consent may be withdrawn subject to the restrictions and exemptions provided by law by giving reasonable written notice to the Privacy Officer designated by BDM + Furniture Inc.

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7. USE OF PERSONAL INFORMATION

We use personal information to ensure the business relationship between the customer and the partner, for example, to authorize the opening of a customer account, to process orders, to complete a purchase transaction, to replace a part, to make deliveries, to respond to general inquiries, to improve the customer experience, to create statistics, to allow the voluntary registration of a user of the websites owned by BDM + Furniture INC. to a mailing list for e-mails, catalogs or promotions, to allow the registration of a user to a survey aimed at knowing his habits, needs or preferences, to allow communications on web sites developed by BDM + Furniture INC. For employees, we generally use personal information, for example, to compile files, to contact reference persons in case of emergency, to make the salary payment and deposit it with their financial institution, to register for group insurance and group RRSPs, and to process absence-from-work files.

7.1 NON-PERSONAL ANALYTICAL DATA

When a user visits websites owned by BDM + Furniture Inc. the IP address and/or browser language is validated to determine the appropriate language and region for the default display of the website. This data is not retained for future use. It is used only to optimize the customer experience. BDM + Furniture Inc. also collects certain non-personal analytical data concerning use of its Web sites, which is used to optimize the customer experience and for analytical purposes. This information may, from time to time, be shared with third parties, notably in connection with the services offered by Google Analytics. For further information on this subject, please consult "How Google uses data from sites or applications Google Analytics and privacy".

7.2 PERSONAL ANALYTICAL DATA

When a user visits websites owned by BDM + Furniture INC. the IP address and/or browser language is validated to determine the appropriate language and region for the default display of the website. This data is not retained for future use. It is used only to optimize the customer experience.

7.3 ANALYTICAL DATA THAT MAY BE PROVIDED TO THIRD PARTIES

Subject to having obtained the authorization of the user of the BDM + Furniture Inc. web sites, in general, BDM Furniture + Inc. uses the personal information collected with respect to users for internal purposes only. However, subject to obtaining the user's authorization, BDM + Furniture Inc. may communicate the personal information collected to the following partners, to know:

- To external service providers with whom BDM + Furniture Inc. has entered into a contractual agreement that provides comparable levels of protection for personal information and who use such personal information, including but not limited to: in connection with and for the purposes of services that BDM + Furniture Inc. provides to users, such as, for example, payment tools like Paypal or to meet administrative requirements such as printing and faxing, archiving or document and e-mail management. For example, the service provider(s) who host(s) the Web Sites and perform(s) maintenance services to the Web Sites may potentially access users' personal information in connection with the specific performance of its/their services under confidentiality obligations.

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- BDM + Furniture Inc. service providers (for example, social networks, search engines or analytical services such as Google Analytics) that offer analytics tools or measurement reports about individuals who view advertisements or perform online searches according to preferences, interest's preferences, interests, demographic parameters, or geographic areas, to enable allow BDM + Furniture Inc. to target similar audiences for advertising purposes; and/or for advertising purposes; and/or

-To manufacturers and partners of BDM + Furniture Inc. for delivery, customer service and after-sales service, including but not limited to the fulfillment of warranties on certain products, or with whom BDM + Furniture Inc. has direct shipment agreements.

-To third parties when required by law;

BDM + Furniture Inc. may share your personal information with third parties operating outside Quebec in the categories listed above. To this end, BDM + Furniture Inc. conducts a privacy impact assessment with each of these third parties and always ensures that when your information is communicated outside Quebec, it benefits from adequate protection, particularly with respect to generally accepted principles of personal information protection.

8. SECURITY MEASURES

BDM + Furniture Inc. has implemented and continues to develop strong security measures to ensure that personal information remains strictly confidential that is protected against loss, theft or unauthorized access, disclosure, copying, use or modification. These security measures include, among others:

- Password-controlled electronic access, data backup and archiving using an external system, use of passwords and encryption, password change policy and mandatory complex passwords, use of firewalls and operators with restricted and controlled access, etc.

9. UPDATE OF PERSONAL INFORMATION

Any partner, client, employee, or user of BDM + Furniture Inc. websites who has provided personal information to BDM + Furniture Inc. is entitled to consult, rectify, extract, or update their personal information or to obtain information on the processing of their data by submitting a written request to the Privacy Officer identified in this Policy. A request sent to BDM + Furniture Inc. will be treated with diligence. In addition, BDM + Furniture Inc. will inform the person making the request of the personal information that has been collected about him or her and will provide a copy of the information, if applicable. If BDM + Furniture Inc. is unable to provide access to certain personal information that has been collected, the reasons for such an impediment as well as the possible recourses will be transmitted to the requesting party.

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10. RETENTION OF PERSONAL INFORMATION

BDM + Furniture Inc. will establish retention periods and procedures for the safekeeping and destruction or depersonalization of personal information, all with a view to maintaining to maintain the confidentiality of Personal Information and to comply with its obligations under obligations under applicable laws.

11. DESTRUCTION OF PERSONAL INFORMATION

Subject to a retention period established by government regulation, BDM + Furniture Inc. will securely destroy or de-identify personal information once the purpose for which it was collected has been fulfilled. Once the purpose of the file has been fulfilled, use of the data is permitted with the consent of the person concerned, subject to the retention period established by government regulation. The method of document destruction depends on the type of media on which the documents are stored.

12. PERSONAL INFORMATION PROTECTION OFFICER

BDM + Furniture Inc. has appointed a Privacy Officer. The Privacy Officer is responsible for receiving requests for access to or correction of personal information. Any employee, customer or partner who becomes aware of a risk concerning the protection of personal information or the maintenance of security is invited to report it to the person in charge.

Alexe Bachand-Côté

Human Ressources Manager

Meubles BDM + inc.

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819-601-8702

13. INCIDENT OR COMPLAINT HANDLING PROCESS

In the event of an incident that presents a serious risk of harm, BDM + Furniture Inc. will, subject to applicable legislation, notify the “*Commission d’accès à l’information*”, notify the person concerned and keep a register of incidents that will be forwarded to the Commission at its request. The assessment of risk of harm is based on the sensitivity of the information concerned, the apprehended consequences of its use and the likelihood that it will be used for harmful purposes.

If BDM + Furniture Inc. has reason to believe that a privacy incident involving personal information held by BDM + Furniture Inc. has occurred, reasonable steps will be taken to minimize the risk of harm and to prevent similar incidents in the future.

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14. LIMITATION OF LIABILITY

The use of technologies such as the Internet involves considerable risk. As a result, it is impossible to guarantee that personal information is completely secure. However, BDM + Furniture Inc. uses all necessary measures at its disposal to protect data. Accordingly, BDM Furniture Inc. and its suppliers shall not be held liable for any damages or injury that may arise or result, directly or indirectly, from a breach of confidentiality of data and/or information transmitted over the Internet to BDM + Furniture Inc.

15. REVISION

Subject to applicable law, BDM + Furniture Inc. reserves the right to revise the terms of this policy at any time. The revised policy will be available on the company's website.