



## Privacy Policy

### Purpose

Pomerleau Inc. (“**Pomerleau**”, “**we**”, “**our**” or “**us**”) is committed to privacy. This privacy policy (the “**Policy**”) details how and for what purposes we collect, use and share personal information. This Policy generally applies to personal information we collect whenever you interact with us, for instance if you visit our website<sup>1</sup>, our online recruitment platform<sup>2</sup>, contact us through social media and e-mail, or apply for a job with Pomerleau. It may also apply to personal information we receive from our clients, subcontractors, and business partners. This Policy does not apply to Pomerleau’s collection, use and disclosure of personal information about its employees.

### Personal information

In this Policy, “personal information” generally means any information that can be used, either alone or in combination with other information, to identify an individual. This includes information such as your name, contact details and birth date. It may also include other types of more technical information, but only when this information can identify you as an individual.

### Types of personal information we collect

We limit the collection of personal information to what is reasonably required to provide our services to you, to respond to any other requests you may make and for the other purposes described below under [Use of personal information](#). Depending on your interaction with us, we may collect the following types of personal information:

- **your name and contact information**, which may include your e-mail address, home address and phone number,
- **job-related information**, such as your work experience and training (including your academic background, university program and year of graduation), your specialization (including your training card), your certificate of competence issued by the Commission de la Construction du Québec (CCQ), your work schedule and employment status, and your work or residence permit. Also included are your emergency contacts, as well as medical and work accident information,
- **biometric information**, including those relating to your gender identity and the pronouns you use,
- **video images and photos**, such as video images and photos collected using video cameras, surveillance cameras or still cameras, and

<sup>1</sup> Our website is accessible via the following link: <https://pomerleau.ca/en>.

<sup>2</sup> Our online recruitment platform is accessible via the following link: [https://jobs.pomerleau.ca/en\\_US/careersmarketplace](https://jobs.pomerleau.ca/en_US/careersmarketplace).

**information related to online activity**, including IP addresses, sections visited on our website or language preferences. We may collect this data from website visitors through the use of “cookies” and similar technologies (for more details, please see the [Cookies and similar technologies](#) section of this Policy).

## How we collect personal information

We collect personal information in a variety of ways, including

- **directly from you.** We may collect personal information directly from you under some circumstances, for instance if you contact us (including by e-mail, social media, etc.), if you apply for a position at Pomerleau (including on our online platform, careers website and/or through a third party), if you visit our offices, if you meet a Pomerleau representative at conferences or similar business events, or through your business interactions with Pomerleau,
- **from our business partners and clients.** If you are an employee of a client or business partner of Pomerleau, your employer may provide us with personal information about you, as relevant to our business relationship between Pomerleau and your employer, and
- **through technologies we use on our website.** Pomerleau may collect certain types of information electronically through your contact with our website using technologies (either our own or third-party technologies) such as cookies and web beacons (for more details, please see the [Cookies and similar technologies](#) section of this Policy).

## Use of personal information

We may use your personal information for the following purposes:

- **Providing our services.** We use personal information as necessary to provide and deliver our services. For instance, we may need to use your personal information to manage Pomerleau’s business relationship to deliver a project.
- **Communicating with you.** If you contact us with a question or inquiry, we may use your personal information to respond to you. We may also communicate with you for business development purposes and to promote our services and offers.
- **Processing job applications.** If you apply for a position at Pomerleau, we may use your personal information as necessary to process and evaluate your application, as well as to contact you in response to your job applications. With your consent, we may also retain your personal information in order to share with you new employment opportunities within Pomerleau.
- **Managing our business.** We use your personal information for several reasons in connection with our business operations, which may include exercising due diligence to prevent or reduce our commercial risk and to ensure the security of our information, system or network. We may also use information for internal business analytics purposes (when possible or when required by law, we will de-identify information before using it for such purposes).
- **Managing our construction sites.** We use your personal information for several purposes related to the management of our construction site activities, for example, to meet our health and safety obligations, in the event of an accident, or to manage our construction projects. We may also use this information for internal statistical and analysis purposes.

- **Managing our website.** We use information we collect from website visitors to manage and improve our website (for more details, please see the [Cookies and similar technologies](#) section of this Policy).
- **For other purposes as permitted or required by law.** The information we collect may be used to protect the security of our information and website or to comply with legal requirements, where applicable.

We may also request your consent to use your personal information for other specific purposes.

## Sharing your personal information

We may share your personal information as follows:

- **With our affiliates.** Pomerleau may share personal information with its affiliated companies for the purposes described in this Policy, to comply with applicable laws, regulations and requirements to ensure that your information is consistent, accurate and up to date.
- **With our service providers.** We may transfer your personal information to other organizations and businesses that provide services to us (such as backup and server hosting providers, IT software and maintenance providers, providers in connection with the management and processing of job applications and opportunities, health and safety providers, providers involved in the management and processing of job applications and opportunities, or other technology suppliers). We require these service providers to protect personal information with appropriate security safeguards and to limit their use of personal information to what is necessary to carry out their mandate.
- **In the context of the sale or transfer of our business or other transaction.** We may decide to sell or transfer all or part of our business to a third party, merge with another entity, secure our assets or proceed with any other financing or other strategic capital transactions (including insolvency or bankruptcy proceedings), restructuring, share sale or other change in corporate control. We may share your personal information when required for the purposes of such a transaction.
- **Other permitted reasons.** We may share your personal information when permitted or required by applicable law. This may be the case, for instance, if Pomerleau is under a duty to disclose or share your personal information in order to comply with any legal obligation, or to enforce or apply Pomerleau's terms of use and other agreements, or to protect the rights, property, or safety of Pomerleau, Pomerleau's clients and business partners.

## Cookies and similar technologies

We may collect certain types of information electronically through your interaction with our website using technologies (either our own or third-party technologies) such as cookies. Cookies are small text files that are stored on your computer when you visit a website. To learn more about how we (and third parties) use cookies, please see our *Cookies Policy*.

## Your privacy choices

By using our services, by interacting with us - whether by visiting our website, by communicating with us via e-mail or social media, by applying for a job with Pomerleau, as a worker for a subcontracting partner,



or by visiting one of our job sites - you consent to the collection, use, sharing and retention of your personal information in accordance with this Policy. In some cases, your consent may be assumed at the time of collection, use or sharing of your personal information. Generally, we will seek your express consent if we wish to use your personal information for purposes other than those set out in this Policy or in the terms and conditions of a specific service you have requested, in accordance with applicable privacy laws.

You may withdraw your consent to Pomerleau's use and sharing of your personal information, subject to legal and contractual obligations, by giving us reasonable notice. To do so, please submit a written request using the contact information provided in the [Contact us](#) section of this Policy. Please note that withdrawing your consent may limit our ability to provide certain services to you and/or your employer, or to continue communications related to a job application you have submitted to us.

## Protection of your personal information

To protect your personal information, we employ organizational, physical and technological safeguards. Our goal is to prevent unauthorized access, loss, misuse, sharing or alteration of personal information in our possession. We also use these safeguards when we dispose of or destroy your personal information.

## Retention of your personal information

We keep your personal information only for as long as is necessary to provide our services, manage our business and meet our legal and regulatory obligations. When no longer required, your personal information is securely destroyed.

## Hosting your personal information

We are a Canadian company with headquarters in the province of Quebec, and we generally store personal information in Quebec or, where that is not possible, in Canada. However, some of our service providers may access, process or store personal information outside of Canada, including in the United States. As a result, your personal information may be subject to the laws foreign jurisdictions, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction. We will only transfer personal information to a third party outside of Quebec if we are confident that it will receive adequate protection in the foreign jurisdiction.

## Access and correction to your personal information

Pomerleau respects your right to access your personal information, to request its communication (portability) and to request its rectification if it is inaccurate, incomplete or equivocal, subject to any applicable legal restrictions. To exercise these rights, please use the contact information listed in the [Contact us](#) section below.

## Changes to the Policy

We may make changes to this Policy from time to time. Any changes we make will be effective when we post the revised Policy on our website. If we make any significant changes to the Policy, we will post a notice on our website or contact you to inform you when required by law. By continuing to interact with us after the modified version of the Policy has been posted, you are accepting the changes to the Policy, subject to any additional requirements that may apply.



## Contact us

If you have any questions or complaints about how we handle your personal information or if you want to exercise your privacy rights, please contact our Chief Privacy Officer at:

Marie-Élisabeth Baribeau  
Chief Privacy Officer  
Pomerleau inc.  
500 St. Jacques St., 3<sup>rd</sup> Floor  
Montreal, QC H2Y 1S1

E-mail: [vieprivee@pomerleau.ca](mailto:vieprivee@pomerleau.ca)