

Privacy Policy

Effective Date: 28-10-2024

Last updated: 28-10-2024

1. General information

a) Introduction

Purpose. Privacy is important to MSP Operational Corp. and its affiliated entities (the "**Company**", "**We**", "**Us**", "**Our**"). For this reason, We have put in place safeguards and practices for the sound management of Your Personal Information in accordance with the laws applicable in Quebec and Canada.

Consent. By using any of Our websites including <https://mspcorp.ca>, <https://east.mspcorp.ca>, <https://central.mspcorp.ca>, <https://prairies.mspcorp.ca>, <https://west.mspcorp.ca> and <https://acquisitions.mspcorp.ca> (the "**Website**") or one of Our Services, You agree that We may collect, use, disclose, communicate, disclose and retain ("**Process**" or "**Process**") Your Personal Information in accordance with the terms described herein. If You do not agree to abide by and be bound by this Policy, You are not permitted to visit, access or use Our Website or Services, or to share Your Personal Information with Us.

b) Privacy Officer

Contact information. Any comments, questions and complaints regarding the Company's Privacy Policy and practices may be directed to Our Privacy Officer at the following coordinates:

Telephone : 1-866-352-6000

Email : privacy@mspcorp.ca

Address : 8270 Mayrand, Montréal, Québec, H4P 2C5

2. Definitions

Definitions. The following concepts and expressions, when they appear with a first letter in capital letters in the Policy, have the meaning ascribed to them below, unless otherwise implicitly or explicitly stated in the text:

"**Company**", "**We**", "**Us**", "**Our**": MSP Operational Corp. and its affiliated entities.

"**Service Provider**" means any person who processes Personal Information on behalf of the Company. These are third-party companies or individuals employed by the Company to facilitate the Services, provide the Services on behalf of the Company, perform services related to the Services, or assist the Company in analyzing the use of the Services.

"**Cookie Banner**": pop-up window requesting Your consent to certain collections of Your Personal Information on the Website.

"**Personal Information**" means any information about a natural person that allows him or her to be identified, i.e., that directly or indirectly reveals something about the identity, characteristics (e.g., skills, preferences, psychological tendencies, predispositions, mental capacities, character and behaviour of the person concerned) or the activities of that person, regardless of the nature of the medium and regardless of the nature of the material. in which this information is accessible (written, graphic, audio, visual, computerized or other).

"**Privacy Officer**": the person in charge of the application of this Policy and whose contact information is identified in section 1b) of this Policy.

"**Services**": Services refers to the applications of the Website, Our social media pages and any programs and services provided to You therein such as:

- Managed IT Services;
- Cybersecurity;
- Network support;
- IT consulting;
- Computer support;
- IT support services;
- Procurement management;
- Services web;
- Connectivity.

"**Website**": Our websites including <https://mspcorp.ca>, <https://east.mspcorp.ca>, <https://central.mspcorp.ca>, <https://prairies.mspcorp.ca>, <https://west.mspcorp.ca> and <https://acquisitions.mspcorp.ca>.

"**Cookie**": Cookies are text files that are installed on Your computer or mobile device. These cookies may contain information about Your search history, the web pages You visit and Your web browser.

"**Process**", "**Processing**": Concept encompassing any operation that may affect or concern personal information, including: collection, use, storage, destruction, communication or transmission.

" **You** ", " **Your** ": Persons benefiting from Our Services, visitors to the Website and any users using the Company's Services.

3. Processing of Personal Information

3.1 Collection of Personal Information

3.1.1 Means of collection

Various means. We collect Your Personal Information through Our Website or any other technological means in various ways, including:

- **Automatically.** When You connect to Our Website, the device You use to connect to Us will provide Us with Personal Information;
- **Electronic forms.** By completing and providing Us with one of Our electronic forms;
- **Emails communicated.** By emails that You communicate to Us using one of the email addresses available on Our Website;
- **Cookies.** By cookies including the cookies identified in Our **Cookie Policy**;
- **Surveillance cameras.** By the surveillance cameras installed on Our property; and
- **Partners.** By third parties who collect Your Personal Information for Us.

Profiling, Identification or Location. Our Website has functions to profile Your activities on Our Website, to identify You and to locate You. These features are used by third parties identified in section 3.4.2 through cookies.

3.1.2 Personal Information Collected

Categories of Information Collected. In the course of Our business, We may collect and process the various types of Personal Information including the information listed below:

- **Identification information** and contact information, including Your first and last name, email address, telephone number;

- **Technological information**, including login information and other information about Your activities on the Website, such as Your IP address, the pages You visited, the time and date of Your visits, Your number of connections, Your domain name, the address of the referring site (if you are accessing the Website from another site), the type of browser You use, Your device's operating system, and other hardware and software information;
- Your **consents** to the use of certain cookies on Our Website and to the disclosure or use of Your Personal Information;
- **Information necessary for the provision of Our Services**, such as information about the Services We have rendered to You or are providing to You;
- **Information You choose to provide or provide to Us**, for example, when You fill out an online form, respond to solicitations or surveys, or communicate with one of Our employees or representatives;
- **Geolocation information** such as: such as: Your region of residence.

Restriction of processing to necessary and legitimate purposes. In each case, such Personal Information is processed in accordance with the legitimate and necessary purposes listed in Section 3.3 below.

3.2 Opting out of a collection

Refuse to consent. Unless otherwise provided by law or Your contractual obligations, You may refuse or withdraw Your consent to certain specific uses or disclosures of Your Personal Information:

- failing to include Your Personal Information in Our electronic or paper forms where the provision of such forms is indicated as optional;
- by selecting "refuse" in the Cookie Banner; or
- by sending a request to Our Privacy Officer at the contact information identified in section 1b) of this policy.

3.3 Use of Personal Information

Purposes of Personal Information. We may use Your Personal Information for the purposes described below:

- operate, maintain, supervise, develop, improve and offer the functionalities of Our Website;
- Present and provide Our Services to you;
- protect Our people and property;
- evaluate a job application;
- to perform Our contractual obligations to You;
- manage invoicing and process payments;
- To process and resolve complaints and dissatisfactions;
- developing, improving and offering new Services;
- Send you messages, updates, security alerts;
- for marketing and business development purposes, if You have previously consented to the processing of Your Personal Information for such purposes;
- respond to Your questions and provide You with assistance as needed;

- conduct research, analysis and statistics in connection with Our Company and Services;
- detect and prevent fraud, errors, spam, abuse, security incidents, and other harmful activities; or
- for any other purpose imposed or permitted by applicable law.

3.4 Access, Disclosure and Transfer of Personal Information

Access and communication. We may transfer, disclose or allow access to Your Personal Information to Our employees and Service Providers, who need the information to help Us operate Our Website, perform Our Services, conduct Our business or serve You.

3.4.1 Access to Personal Information in the Company

Limiting Access to Personal Information. Your Personal Information is only accessible to Our directors, employees or representatives who need access to Your Personal Information in order for them to perform their duties. As such, Your Information may be accessible to:

- Our Privacy Officer;
- Our IT services ("Information Technology");
- Our sales services;
- Nos services marketing ;
- Our human ressources (in case of job applications).

3.4.2 Disclosures of Personal Information

Protective measures when communicating to third parties. We will only disclose Your Personal Information to Our Service Providers if they have previously agreed in writing to keep Your Personal Information confidential in accordance with applicable laws. Without limitation, Our Service Providers may only use Your Personal Information on a confidential basis as directed by Us and only for the purposes for which it was provided.

Our Service Providers. We may use Service Providers to perform various services on Our behalf, such as IT management and security, marketing, and data analysis, hosting, and storage. Below we have defined some of the cases in which such sharing may occur:

- We use the **Google Analytics** Cookie to analyze the Website's audience and compile statistics. For more information, see [Google](#) 's **privacy policy** and [their table of cookies for advertising and measurement](#);

Please note that this Cookie may collect Personal Information that can locate You and profile Your web activities;

This Cookie discloses Personal Information to Google for the purposes identified in Our [Cookie Policy](#) ;

- We use **Twitter(X)** to showcase Our products and Services. For more information, You can consult the [privacy policy](#) of **Twitter (X)**;
- We use **LinkedIn** to showcase Our products and Services. For more information, you can consult [LinkedIn's privacy policy](#);

Please note that this Cookie may identify You and profile Your web activities in order to provide You with advertising that would meet Your interests (targeted advertising);

- We use **Google Ads** to analyze the audience of Our Services, compile statistics and converse with customers and prospects. For more information, see [Google's privacy policy](#) and their [table of advertising and measurement cookies](#);

Please note that this Cookie may identify You and profile Your web activities in order to provide You with advertising that would meet Your interests (targeted advertising);

This Cookie discloses Personal Information to Google for the purposes identified in Our **Cookie Policy** ;

- We use Meta's services (**Facebook Pixel**) to help understand and serve ads, compile statistics, and engage with customers and prospects. For more information, see [Meta's privacy policy](#);

Please note that this Cookie may identify You and carry out profiling of Your web activities in order to provide You with advertising that would meet Your interests (to carry out targeted advertising) or to sell advertising products such as real-time bidding from third-party advertisers;

This Cookie discloses Personal Information to Meta for the purposes identified in Our [Cookie Policy](#) ;

- We use **Breezy** to process job applications. For more information, you can consult [Breezy](#) 's **privacy policy**;
- We use **Connectwise** to process submissions. For more information, You can consult [Connectwise's Privacy Policy](#);
- We use **Microsoft services (Outlook and the Microsoft Office suite)** to store Our documents and emails. For more information, see [Microsoft's privacy policy](#)

All categories of Personal Information identified in Section 3.1 may be disclosed or maintained through this service.

- We use **Metatracer** on Our digital systems to facilitate the detection and management of Your Personal Information and that of Our employees, all to ensure Our compliance with privacy laws.

Metatracer collects, like Personal Information, only identifying information.

- We use **Intuit (Quickbooks)** to process billing. For more information, you can consult the [Intuit \(Quickbooks\) Privacy Policy](#);
- We use **Nuvei** to process credit card payments. For more information, you can consult [Nuvei's](#) privacy policy;

3.4.3 Communication outside Quebec

Disclosure of Personal Information Outside of Quebec. We may disclose Your Personal Information outside of Quebec and mandate an entity located outside Quebec to collect, use or store Your Personal Information on Our behalf.

3.4.4 Compliance with legislation, responding to legal requests, preventing harm and protecting Our rights

Specific Communications of Your Personal Information. We may disclose Your Personal Information when We believe that such disclosure is permitted, necessary or appropriate, including:

- to respond to requests from public and government authorities, including public and government authorities outside Your country of residence;
- to protect Our business;
- to comply with legal process;
- to protect Our rights, the privacy of Our employees, officers and directors, Our safety and property;
- to protect Your privacy and rights, or the privacy and rights of third parties;

- to enable Us to pursue available remedies or limit the damages that We may sustain; and
- where it is consistent with or required under applicable laws, including laws outside Your country of residence.

3.4.4 Business transaction

Possibility of commercial transactions. We may share, transfer or communicate, in strict accordance with this Policy and the provisions of the *Act respecting the protection of personal information in the private sector*, CQLR c P-39.1 (the "**Private Sector Act**") and the *Act to modernize legislative provisions as regards the protection of personal information*, SQ 2021, c 25 (the "**Bill 25**", sanctioned on September 22, 2021), Your Personal Information in the event of a sale, transfer or assignment, in whole or in part, of the Company or Our assets (for example, as a result of a merger, consolidation, change of control, reorganization, bankruptcy, liquidation or other business transaction, including in connection with the negotiation of such transactions). In this case, We will notify You before Your Personal Information is transferred and is governed by another privacy policy.

3.5 Consent

Consents for the Collection, Use or Disclosure of Personal Information. BY USING OUR WEBSITES, BY SUBMITTING YOUR PERSONAL INFORMATION BY EMAIL OR USING AN ONLINE FORM, YOU CONSENT TO THIS PRIVACY POLICY AND TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE PRIVACY POLICY.

Refusal to Use the Website. If You do not consent, please discontinue using the Websites. Except where otherwise provided by law, You may withdraw Your consent at any time upon reasonable notice. Please note that if You choose to withdraw Your consent to the collection, use or disclosure of Your Personal Information, certain features of Our Website may no longer be available to You or We may no longer be able to offer You some of Our services.

Consent of minors under 14 years of age. We do not knowingly collect or use Personal Information from anyone under the age of 14. If You are under the age of 14, You must not provide Your Personal Information to Us without the consent of Your parent or guardian. If You are a parent or guardian and You become aware that Your child has provided Us with Personal Information without consent, please contact Us using the contact information provided in Section 1b) above to request that We delete that child's Personal Information from Our systems.

3.6 Retention of Personal Information

Retention of Personal Information. Subject to applicable laws, We retain Your Personal Information only for as long as necessary to fulfill the purposes for which such information was collected, unless You consent to Your Personal Information being used or processed for another purpose.

4. Your rights

List of rights. As a data subject, You may exercise the rights set out below by contacting Our Privacy Officer in writing at the contact information provided in the section **1b)** of Politics. Please note that We may require You to verify Your identity before responding to any of these requests.

- You have the right to be informed about the Personal Information We hold about You, its use, disclosure, retention and destruction, subject to the exceptions provided by applicable law;
- You have the right to access Your Personal Information, to request a copy of documents containing Your Personal Information, subject to the exceptions provided by applicable law, and to obtain, where applicable, additional details about how We use, disclose, retain and destroy it by communicating a written request to Our Privacy Officer at the contact information identified in section 1b) of this Policy;

- You have the right to have the Personal Information We hold about You rectified, amended and updated if it is incomplete, ambiguous, outdated or inaccurate by sending a written request to Our Privacy Officer at the contact details identified in section 1b) of this Policy;
- You have the right to withdraw or modify Your consent to the collection, use and disclosure of certain of Your Personal Information collected (as identified in Section 3.1 of this Policy) at any time, subject to applicable legal and contractual restrictions;
- You have the right to ask Us to stop disseminating Your Personal Information and to de-index any link to Your name that provides access to such information if such dissemination contravenes the law or a court order;
- You have the right to request that Your Personal Information be communicated to You or that it be transferred to another organization in a structured and commonly used technological format;
- The right to be informed of a privacy incident involving Your Personal Information that could cause You serious harm. To this end, we keep a register that lists all confidentiality incidents and assess the damage they may cause; and
- You have the right to file a complaint with the Commission d'accès à l'information, subject to the conditions set out in applicable law.

5. Security measures

Purposes of Our Security Measures. We have implemented physical, technological and organizational security measures designed to adequately protect the confidentiality and security of Your Personal Information against loss, theft or unauthorized access, breach, disclosure, copying, disclosure, disclosure, use, modification.

6. Changes to this Privacy Policy

Right to Modify this Policy. We reserve the right to modify this Policy at any time in accordance with applicable law. If we make any changes, We will post the revised Privacy Policy and update the updated date in the footer of the Privacy Policy. We will reasonably notify You of the new version of Our Policy prior to its effective date. If You do not agree with the new terms of the Privacy Policy, We invite You to stop using Our Website and Services. If You continue to use Our Website or Services after the new version of Our Policy comes into effect, then Your use of Our Website and Services will be governed by that new version of the Policy.

7. Applicable Laws

Laws of Quebec and Canada. The laws of Canada and the province where you reside, excluding its conflict of law rules, will govern this Agreement and Your use of the Website. Your use of the Website may also be subject to other local, provincial, national or international laws.