

Privacy policy – Bureau de la sécurité privée

SUMMARY OF THE POLICY

Means

The Bureau de la sécurité privée (the "BSP") collects personal information by using the following means:

- In particular, as a result of the use of cookies, automatically when you visit the BSP Websites accessible via the following hyperlinks (collectively referred to as the "Website"):
 - General site: https://www.bspquebec.ca/en
 - Register of Licence Holders: https://registre-public.bspquebec.ca/
- When you create any user account, or log into such an account, to access any of the following BSP digital platforms (collectively referred to as the "Platforms", or alternatively either by the "Platform"):
 - My Account: https://www.bspquebec.ca/en/inscription-agent
 - Accès Agence Portal: https://acces-bsp.bspquebec.ca/.
- · When you provide personal information to the BSP through the Website and/or one of the Platforms;
- When you provide personal information to the BSP via the following third-party websites:
 - Tresorit, for secured document filing.
 - Jotform, for the interactive application forms for regular and temporary agent licences.
- When you contact the authorized BSP representatives (in-person communications or telephone, emails, mail, faxes, etc.).

<u>Purposes</u>

The BSP collects your personal information for the following purposes:

- Process any licence application for an agent or agency in accordance with the provisions of the *Private Security Act* (RLRQ, c. S-3.5) and its regulations (the "Act");
- Process any complaint received in respect to an agent or an agency licence holder;
- Carry out all obligations incumbent upon the BSP under the Act and any other applicable legislation, as well as exercise all rights granted to the BSP under the Act and any other applicable legislation;
- Ensure compliance with the terms of use of the Website, which are accessible via the following hyperlink: https://www.bspquebec.ca/en/36/terms-of-use;
- Provide information about the BSP, its activities and its mission to protect the public;
- Receive and process any request you make to the BSP;
- Communicate with you to provide various information related to your file with the BSP;
- Process any transaction you wish to carry out with the BSP;
- Process your job application submitted to the BSP, whether it is a spontaneous application or related to a BSP job offer;
- Communicate with you should the BSP wish to follow up or obtain more information on your job application and/or inform you of any decision taken by the BSP in relation to such application;
- Protect the property and/or security of the BSP (for example, the BSP may use your personal information in the context of a litigation between you and the BSP, or to identify and prevent access to our Website by robots);
- Develop, improve and promote the various programs and tools implemented by the BSP, in particular by generating and publishing depersonalized statistical data based on your personal information;
- Measure changes in the popularity of the various components of the Website and Platforms;
- Identify the technology you use when accessing the Website and/or Platforms (such as the operating system and browser) to assess the compatibility and improve overall accessibility;
- Identify the websites from which you access the Website to assess the number of referrals obtained;



- Identify the country from which you wish to access the Website and/or Platforms to verify whether access can be granted to you in compliance with applicable legislation; and/or
- Allow you to access the Website and/or the Platforms.

Communications

BSP may disclose all or part of your personal information to the following entities:

- the Sûreté du Québec or any other police force in accordance with sections 27 to 28 of the Act.
- the relevant government authorities to corroborate the information you have provided in support of your licence application regarding your identity and status in Canada, and to obtain additional information or documents from them, if needed.
- your current and former employers, the Parity Committee for security guards and any training institution or bodies you may have attended, if applicable, to corroborate the truthfulness, accuracy and completeness of any information provided as part of your agent licence application, particularly regarding your work experience and trainings, and to obtain additional information or documents from such entities if needed;
- To entities listed in <u>Registre des communications de renseignements personnels</u>, for the purposes indicated therein; and/or
- To third parties in compliance with any applicable legislation or with your consent.

Important information

The BSP may disclose some of your personal information outside of Quebec.

During your use of the Website and/or Platforms, personal information is collected using technology that includes features to identify, locate and profile you. The collection of personal information for identification, location and profiling purposes is disabled by default, except for necessary cookies (which are not third-party cookies). You can activate these features by giving your express consent, or by pressing the appropriate button on the pop-up window that appears when you access the Website and/or Platforms. Alternatively, you can enable these features by adjusting the privacy settings when accessing the menu on the Website pages.

Your rights

The Act respecting Access to documents held by public bodies and the Protection of personal information (CQLR, c. A-2.1) grants you the right to access, rectify and withdraw consent regarding your personal information held by the BSP. For more information in relation to the aforementioned rights, you are invited to consult section 6 of this Policy.

You may also file a complaint regarding the processing of your personal information by the BSP by following the instructions identified in section 7 of this Policy.

Consent

By using the Website and/or one of the Platforms, or any other means of communication, you consent to the collection, use, disclosure and retention of your personal information by the BSP in accordance with the contents of this Policy and the governance rules adopted by the BSP with respect to the protection of personal information.



Table of contents

| 1 | . F | Pur | pose of the Policy | 4 |
|---|-----|-----------------|--|----|
| 2 | . \ | Wh | at personal information do we collect and by what means? | 5 |
| | 2.1 | 1 | Personal information collected automatically | 6 |
| | 2.2 | 2 | Personal information collected when creating a user account | 7 |
| | 2.3 | 3 | Personal information collected through voluntary communications | 8 |
| 3 | . \ | Wh [,] | y do we collect your personal information? | 9 |
| 4 | . 7 | Το ν | whom do we disclose your personal information? | 11 |
| 5 | . H | Hov | w do we protect your personal information? | 12 |
| 6 | . \ | Wh | at are your rights with respect to your personal information? | 14 |
| | 6.1 | 1 | Right of access | 14 |
| | 6.2 | 2 | Right of rectification | 14 |
| | 6.3 | 3 | Right of refusal and withdrawal | 15 |
| | 6.4 | 4 | Procedure | 15 |
| 7 | . H | Hov | w can you file a complaint on the processing of your personal information? | 17 |
| 8 | . \ | Wh | o can you contact at the BSP regarding your personal information? | 17 |
| 9 | . H | Hov | w can the BSP update this Policy ? | 18 |
| Α | рре | end | dix 1 | 19 |
| Α | nne | ∍nd | dix 2 | 21 |



PRIVACY POLICY - BUREAU DE LA SÉCURITÉ PRIVÉE

(the «Policy»)

Effective date: September 19, 2023

Last update: N/A

1. Purpose of the Policy

Definition. In this Policy, the term "personal information" refers to any information collected by the Bureau de la sécurité privée (the "BSP", "we", "us" and "our") that, alone or in combination with other information, directly or indirectly identifies a natural person (a "Data subject", "you", "your" and "yours"), excluding work contact information. "Work contact information" includes a natural person's name, title and duties, and the address, telephone number and email address of this person's place of work.

Legislative framework. In accordance with the Act respecting Access to documents held by public bodies and the Protection of personal information (CQLR, c. A-2.1) (the "Access Act"), as amended by the Act to modernize legislative provisions respecting the protection of personal information (the "Law 25"), the BSP is updating its measures, practices and policies designed to provide a framework for its governance and operations with respect to the protection of personal information, including this Policy, which repeals and replaces any prior policy in this regard. This Policy and any amended version thereof are subject to the legislation applicable in the province of Quebec.

Policy objectives. The main purpose of this Policy is to provide you with information, in plain language, in connection with:

- the means used by the BSP to collect your personal information;
- the nature of the personal information collected by the BSP and the purposes for which it is collected;
- how the BSP may use your personal information and to which third parties the BSP may disclose that personal information;
- your rights in respect to your personal information held by the BSP, namely the right to access, rectify your personal information in certain circumstances, and to withdraw your consent to the processing of your personal information by the BSP;



- the various measures put in place by the BSP to protect the privacy of your personal information;
- how your personal information is stored, destroyed and/or anonymized, if applicable;
- how you can contact the BSP if you have any questions, comments or complaints in connection with this Policy or, more generally, the BSP's handling of your personal information.

2. What personal information do we collect and by what means?

Name of the public body that collects your personal information. Any collection of personal information covered by this Policy is done on behalf of the BSP through the means listed below.

List of means. The BSP may collect your personal information through the following means, including through the use of cookies and similar technologies (collectively: "Digital markers"):

- When you visit the BSP's websites accessible via the following hyperlinks (collectively referred to hereinafter as the "Website"):
 - o General site: https://www.bspquebec.ca/fr
 - o Register of Licence Holders: https://registre-public.bspquebec.ca/
- When you create any user account to access one of the following BSP's digital platforms (collectively referred to hereinafter as the "Platforms", or alternatively either of them by the "Platform"):
 - o My Account: https://www.bspquebec.ca/fr/inscription-agent
 - o Accès Agence Portal: https://acces-bsp.bspquebec.ca/.
- When you connect to one of the BSP's Platforms;
- When you communicate personal information to the BSP via the Website and/or one of the Platforms;
- When you complete and submit a BSP application form; and/or
- When you communicate with the authorized BSP's representatives (in-person communications or telephone, emails, mail, faxes, etc.).



Collection through third parties. The BSP may also collect your personal information through the following third parties:

- When you file documents to the attention of the BSP through its secure accounts offered by the third party "Tresorit" (to view <u>tresorit's private policy</u>).
- When you complete a regular or temporary agent licence application through the interactive forms hosted by the third party "Jotform" (to view <u>JotForm's private policy</u>).

The sole purpose of using these third parties services is to facilitate the collection of your information through technological means developed by them. It is not mandatory to transmit your personal information through these third parties and you may always transmit your personal information directly to the BSP through the various means listed in the previous point "List of means".

2.1 Personal information collected automatically

Automatic collection. When you access the Website and/or one of the Platforms, the BSP collects the following information automatically:

- The IP address of the device you use to access the Website and/or one of the Platforms:
- The type and model of the device you use to access the Website and/or one of the Platforms;
- The browser you use (Chrome, Microsoft Edge, Firefox, Safari, Brave, Opera, etc.) to access the Website and/or one of the Platforms;
- The language of the browser you use to access the Website and/or one of the Platforms;
- The type and version of the operating system of the device you use to access the Website and/or one of the Platforms (Windows, MAC OS, Linux, etc.);
- The date and time of your access to the Website and/or any of the Platforms;
- The pages you consult on the Website and/or one of the Platforms;
- The searches you carry out when you consult the Website; and
- The website URL from which you access the Website.

Digital markers. Digital markers are files stored on a Data subject's browser when accessing the Website and/or one of the Platforms to facilitate or improve current and future interactions between the browser used and the server on which the Website and/or Platforms are hosted. For example, cookies, HTML5 storage specifications, pixel tags and embedded scripts are Digital markers. For a complete list of the Digital markers used by the BSP, please refer to the summary table attached as **Appendix 1** to this Policy.



Mandatory. The automatic collection of the aforementioned personal information is mandatory as it is necessary to allow you to access the Website and/or the Platforms. However, you may refuse the collection of personal information via Digital markers if your device allows it, in particular by installing an add-on module on your browser, but such refusal could prevent you from accessing all or part of the features of the Website and/or Platforms.

2.2 Personal information collected when creating a user account

Creating a "My Account" agent user account. To access the My Agent Account Platform, an agent licence holder must create a user account via the Website at https://www.bspquebec.ca/en. As part of the user account creation process, the BSP collects the following personal information:

- The agent licence number;
- The agent licence holder's date of birth; and
- The agent licence holder's email address.

Creating a "My Account" agency user account. To access the My Agency Account Platform, the representative of an agency licence holder must create a user account via the Website at https://www.bspquebec.ca/en. As part of the user account creation process, the BSP collects the following personal information:

- The representative's surname and first name;
- The representative's date of birth;
- The representative's postal code;
- The representative's mother's maiden name; and
- The representative's email address.

Creating an "Accès Agence" user account. To access the Accès Agence Platform, the representative of an agency licence holder must create a user account via the Website at https://acces-bsp.bspquebec.ca. As part of the user account creation process, the BSP collects the following personal information:

- The representative's surname and first name;
- The representative's email address.

Mandatory. The collection of such personal information is mandatory as it is necessary to allow the BSP to verify your identity and provide you with access to these Platforms.



2.3 Personal information collected through voluntary communications

Voluntary communications. The BSP may collect some personal information that you provide voluntarily during (i) your use of the Website and/or Platforms, (ii) your interactions with an authorized representative of the BSP (in-person communications or telephone, emails, mail, faxes, etc.) and/or (iii) through third parties identified in this Policy. Such personal information that the BSP may collect is as follows:

- Your surname, first name and contact information (address, email address and telephone number);
- Personal information allowing the BSP to determine your eligibility to obtain and maintain an agent's licence in accordance with the provisions of the *Private Security Act* (RLRQ, c. S-3.5) and its regulations (the "Act") (gender, date of birth, mother's maiden name, language, status in Canada, physical and mental health conditions, government-issued photo ID, profession or main occupation, employer's name and contact information, training and employment certificates, documents demonstrating equivalency of training, information on judicial history and good moral character);
- Personal information allowing the BSP to determine the eligibility of the enterprise for which you are a representative, or a related person whose information is required under the Act, to obtain and maintain an agency licence in compliance with the provisions of the Act (surname, first name, date of birth, residential contact information, interest in the enterprise);
- Personal information allowing the BSP to identify you as a respondent able to confirm the identity of an agent licence applicant by authenticating their photo (surname, first name and contact information (address, email address, telephone number), occupation, relationship to the applicant);
- The content and history of your communications with the BSP and its authorized representatives (communications filed in person with the BSP, recordings of a inperson or telephone conversation, communications by email, mail or fax);
- Personal information generated by you in the course of your relationship with the BSP (proof of consent, questions, notices, comments, complaints and survey responses);
- Personal information provided as part of your job application with the BSP (your surname, first name, contact information (address, email address, telephone number), gender, date of birth, languages spoken, information on education, work experience and professional affiliations);
- Personal information that you are required or invited to provide the BSP considering the nature of your relationship with the latter (social insurance number and financial information for employees); and



 Personal information provided as part of a transaction you wish to carry out with the BSP, either in person at BSP's premises which contact information is set out in section 8 below or via the Website and/or Platforms (surname, first name, street address, email address, telephone number and payment information).

Please note that you are responsible for obtaining the consent of a natural person other than yourself prior to disclosing any personal information about that natural person to the BSP. Similarly, the BSP does not knowingly collect personal information from individuals under the age of fourteen (14).

Mandatory or optional. The collection of such personal information is either mandatory or optional. As part of your voluntary communication, the BSP will specify whether the collection is mandatory or optional prior to proceeding with the collection.

3. Why do we collect your personal information?

Purposes for collecting personal information. The "purposes" for the collection are the reasons justifying the BSP's necessity to collect your personal information.

BSP collects your personal information for the following purposes:

- Process any application for an agent or an agency licence in accordance with the provisions of the Act;
- Process any complaint received in respect to an agent or an agency licence holder;
- Carry out all obligations incumbent upon the BSP under the Act and any other applicable legislation, as well as exercise all rights granted to the BSP under the Act and any other applicable legislation;
- Ensure compliance with the terms of use of the Website and Platforms, which are accessible via the following hyperlinks:
 - General site and platform My Account (agent and agency): https://www.bspquebec.ca/en/36/terms-of-use;
 - Register of Licence Holders:
 https://registre-public.bspquebec.ca/conditions-utilisation
 - Accès Agence Portal: https://acces-bsp.bspquebec.ca/
- Provide information on the BSP, its activities and its mission to protect the public;
- Receive and process any request you make to the BSP;
- Communicate with you to provide various information related to your BSP file;
- Process any transaction you wish to carry out with the BSP;



- Process your job application submitted to the BSP, whether it is a spontaneous application or related to a BSP job offer;
- Communicate with you should the BSP wish to follow up or obtain further information regarding your job application and/or inform you of any decision taken by the BSP in relation to such application;
- Protect the property and/or security of the BSP (for example, the BSP may use your personal information in the context of a litigation between you and the BSP, or to identify and prevent access to our Website by robots);
- Develop, improve and promote the various programs and tools implemented by the BSP, including the Website and Platforms, in particular by generating and publishing depersonalized statistical data based on your personal information;
- Measure the changes in popularity of the various components of the Website and Platforms;
- Identify the technology you use when accessing the Website and/or one of the Platforms (such as operating system and browser) to assess compatibility and improve their overall accessibility;
- Identify the websites from which you access the Website to assess the number of referrals obtained;
- Identify the country from which you wish to access the Website and/or Platforms to determine whether access can be granted to you in compliance with applicable legislation; and/or
- Allow you to access the Website and/or the Platforms.

Prior consent to use for other purposes. Subject to the exceptions set out in the Access Act, the BSP will obtain your consent before using your personal information for any other purposes than those listed above.

Authorization to collect personal information for profiling, identification, or location purposes. As a result of the use of certain Digital markers (see summary table attached as Appendix 1 to this Policy), the BSP collects personal information using technology that includes features allowing us to identify, locate and profile you. These specific features are disabled by default, except for cookies (with the exception of third-party cookies). You can activate these features by giving your express consent, or by pressing the appropriate button on the pop-up window that appears when you access the Website and/or of the Platforms. Alternatively, you can enable these features by adjusting the privacy settings of the Website and Platform you are accessing, using the menu on the pages of the Website or Platform.



4. To whom do we disclose your personal information?

Access to and disclosure of personal information. The BSP may provide access to, or disclose, your personal information to the following individuals or entities:

- a. Its employees who require access to such personal information to carry out one or many of the purposes listed in section 3 above, as described in the table attached as Appendix 2;
- b. The Sûreté du Québec, or any other police force, in accordance with sections 27 to 28 of the Act;
- c. The relevant government authorities to corroborate the truthfulness, accuracy and completeness of any information provided as part of your agent licence application, particularly in relation to your identity or status as a Canadian citizen, permanent resident or right to work, as well as to obtain additional information or documents from these authorities, where applicable;
- d. Your previous and current employers, the Parity committee of security guards and the training institutions or bodies you have attended, to corroborate the truthfulness, accuracy and completeness of any information provided as part of your application for an agent's licence, particularly in relation to your work experience and training, and to obtain additional information or documents from these entities, where applicable;
- e. External service providers with whom the BSP has entered into a contractual agreement whereby the external service provider concerned is required to take appropriate measures to:
 - (i) Protect the confidentiality of the personal information disclosed;
 - (ii) Ensure that the personal information disclosed is used only for the purposes of performing its services for the BSP;
 - (iii) Ensure that the personal information disclosed is not held after termination of such contractual agreement;
 - (iv) Promptly notify the BSP of any breach or attempted breach by any individual of any obligation relating to the confidentiality of the personal information disclosed; and
 - (v) Allow the BSP to conduct any verification relating to the confidentiality of the personal information disclosed;



- f. With respect to personal information collected through the Digital markers listed in the table attached to this Policy as Appendix 1, to the providers of such Digital markers; and
- g. To any other person or entity, where prescribed or permitted by the applicable legislation, or with the prior consent of the Data subject.

The BSP may disclose your personal information to individuals or entities in the categories listed above who are located outside the borders of the province of Quebec. In such cases, the BSP will conduct a privacy impact assessment in accordance with the Access Act prior to any such disclosure. The BSP will only disclose your personal information if the privacy impact assessment demonstrates that the individual or entity in question is able to provide adequate protection of said personal information with respect to generally recognized privacy principles, among others.

5. How do we protect your personal information?

Protective measures. The BSP has adopted and implemented a combination of physical, technological, and administrative measures designed to protect your personal information and reduce the risk of unauthorized and/or illegal access, use, disclosure and destruction. Here is a brief description of these protective measures:

- Committee on access to information and the protection of personal information. The BSP has created a committee on access to information and the protection of personal information to support the BSP in fulfilling its responsibilities and obligations under the Access Act;
- Employee and partner selection process. The BSP follows a process that considers its obligations with regard to the protection of personal information when recruiting new employees who will have to handle personal information or entering into a service contract or mandate involving the disclosure of personal information to a third party. In particular, a security check and monitoring of employees and service providers are carried out;
- Confidentiality undertakings and internal directives. All BSP's employees and suppliers who may have access to your personal information are required to sign a confidentiality agreement and to comply with internal directives and contractual obligations regarding the protection of personal information;
- **Training.** The BSP provides training and awareness to each of its employees that may have access to personal information in relation with privacy protection, personal information protection and cybersecurity.



- Access management. The BSP ensures that your personal information will only be made available to its employees required to have access in the performance of their duties to carry out one or many purposes identified in section 3 of this Policy. To this end, the BSP has put in place mechanisms to manage access to digitized personal information, including the granting of distinct access rights based on the employee's position and ongoing logging access. In addition, the BSP keeps your personal information stored on a physical medium in locked premises accessible only by its employees who have been granted specific access rights in this regard.
- **Privacy incident management.** The BSP has developed a privacy incident response plan to ensure prompt reaction to any privacy incident that may affect your personal information. Should a privacy incident present a risk of serious prejudice to you, the BSP will take the necessary measures to notify you, in accordance with the Access Act. The assessment of a risk is based on criteria such as the sensitivity of the personal information affected by the privacy incident, the anticipated consequences of its use, and the likelihood that it will be used for harmful purposes.

The BSP maintains a privacy incident register in compliance with the Access Act.

• Retention periods. The BSP has established retention guidelines to ensure that your personal information is not held beyond the time required to fulfill the purposes described in section 3 of this Policy. Subject to any obligations incumbent upon the BSP under the applicable legislation, your personal information will be securely destroyed within a reasonable time after the fulfillment of the above-mentioned purposes.

Complaint handling process. The BSP has developed and adopted a complaint handling process specific to its handling of personal information. The BSP reassesses the above-mentioned protective measures on a regular basis.

Risk. No organization can validly claim to be immune to the risk of a privacy incident involving personal information. Despite all efforts made to ensure the protection of your personal information, the BSP is unable to provide you with a guarantee that your personal information is safe from the risk of a privacy incident. If you have any reasons to believe that the protection of your personal information has been compromised, please contact the BSP using the contact information indicated in section 8 of this Policy.



6. What are your rights with respect to your personal information?

6.1 Right of access

Extent. Subject to any applicable legislation to the contrary, you have a right of access to your personal information that includes the following ramifications:

- The right to obtain confirmation or information that the BSP collects, uses, discloses, or retains your personal information;
- The right to disclosure of your personal information held by the BSP;
- The right to access your personal information that is held by the BSP, including review of your personal information on-site during regular business hours or remotely and to obtain a copy.

Fees (minimum) payable. The right of access is free of charge. However, should you request that the BSP reproduces, transcribes or discloses your personal information, a reasonable fee, not exceeding the cost of the reproduction, transcription or disclosure, may be required by the BSP. An estimate of these fees will be provided prior to any reproduction, transcription or disclosure.

Applicable procedure. Any request to exercise your right of access must be addressed to BSP's Person in charge of the protection of personal information, whose contact information is set out in section 8 of this Policy, as described in section 6.4 of said Policy.

6.2 Right of rectification

Extent. You have the right to rectification of your personal information held by the BSP, which may be exercised in the following circumstances:

- Your personal information is inaccurate or outdated;
- Your personal information is incomplete;
- Your personal information is ambiguous; and/or
- The collection, disclosure or retention of your personal information is not permitted or legally justified.

Destruction of personal information. You may also ask the BSP, based on your right to rectification, to destroy all your personal information that is outdated or whose collection, disclosure or retention is not authorized or legally justified.

Applicable procedure. Any request to exercise your right to rectification must be addressed to BSP's Person in charge of the protection of personal information, whose contact information is set out in section 8 of this Policy, as described in section 6.4 of this Policy.



6.3 Right of refusal and withdrawal

Optional or mandatory nature of a request for consent. A request for consent to the collection of personal information may be optional or mandatory. An optional consent request implies that the refusal or withdrawal of your consent will not prevent the BSP from interacting with you. On the other hand, a mandatory request means that obtaining and maintaining your consent is required to allow the BSP to initiate and continue its interactions with you.

Right of refusal. You have the right to refuse to provide your consent following an optional consent request to the collection, use, disclosure and/or retention of your personal information, in which case you will be informed of the consequences of such refusal. For example, refusal to accept the use of Digital markers may alter or compromise your experience on the Website and/or Platforms.

You also have the right to refuse to provide your consent to a mandatory consent request, in which case the BSP becomes unable to continue its interactions with you. For example, the BSP cannot complete the processing of an agent licence application submitted by a Data subject who refuses the collection by the BSP of documents containing personal information to determine if they are eligible for an agent licence under the Act.

Right of withdrawal. You have the right to withdraw your consent to the disclosure or use of your personal information collected by the BSP following an optional consent request, in which case you will be informed of the consequences of such withdrawal.

Applicable procedure. Any request to exercise your right of withdrawal must be addressed to the BSP's Person in charge of the protection of personal information, whose contact information is set out in section 8 of this Policy, as described in section 6.4 of this Policy.

6.4 Procedure

Admissibility of an application. Any request to exercise a right under section 6 of this Policy must meet the following criteria to be eligible by the BSP:

- a. The request must be made in writing; and
- b. The request should be directed to the BSP's Person in charge of the protection of personal information whose contact information is set out in section 8 of this Policy.

Identity verification. The BSP must verify your identity before responding to any request to exercise a right under section 6 of this Policy.

Receipt of a request. Upon receipt of a request to exercise a right under section 6 of this Policy, the BSP will send you a written notice indicating the date of receipt of the request, the time limit to answer it, the consequences that may result from failure to act within that period and



the appeal proceeding from which you may avail yourself once the BSP has rendered its decision.

Assistance. Should your request to exercise a right under section 6 of this Policy is not sufficiently specific or following a request to that effect, the BSP will assist you in identifying the personal information covered by your request.

Response time. The BSP is required to respond (positively or unfavourably) to any request to exercise a right under section 6 of this Policy within twenty (20) days of the date of receipt, subject to the possibility for the BSP to verify the identity of the Data subject at the origin of the request. However, the BSP may, in certain circumstances, extend this delay for a period of up to ten (10) days, in which case the BSP must inform the Data subject by written notice before the expiry of the initial twenty (20) day period.

Decision. The BSP shall render a written decision on any request to exercise a right under section 6 of this Policy. If the decision is unfavourable, the BSP must provide reasons for the decision and indicate the provision of the Access Act on which the decision is based, as well as the remedies available to the Data subject and the time limit within which such remedies may be exercised.

Favourable decision on a correction request. If a favourable decision on a correction request is rendered, the BSP is required to issue a copy of any amended or added personal information or, as the case may be, a confirmation of withdrawal of personal information, free of charge.

Access and rectification by technological means. Data subjects who hold an agent licence may access some of their personal information held by the BSP through the Platforms. The Platforms also allow such Data subjects to rectify their personal information themselves. To access the Platforms, you must be an agent (in the case of My Account) or an agency (in the case of the Accès Agence Portal) licence holder and create a user account through the web pages as directed by the following hyperlinks:

- My Account: https://www.bspquebec.ca/en/inscription-agent.
- Accès Agence Portal: https://acces-bsp.bspquebec.ca/



7. How can you file a complaint on the processing of your personal information?

Right to lodge a complaint. If you are not satisfied with the processing of your personal information by the BSP, you may file a complaint to the BSP's Person in charge of the protection of personal information, whose contact information is set out in section 8 of this Policy.

Complaints to the Commission d'accès à l'information du Québec. The Commission d'accès à l'information du Québec is an administrative body whose features particularly include overseeing the application of the Access Act. If you believe that the BSP is not meeting its obligations under the Access Act, you can file a written complaint with the Commission d'accès à l'information du Québec. To do this, you can consult the complaint form available on the website of the Commission d'accès à l'information du Québec.

8. Who can you contact at the BSP regarding your personal information?

Contact information for the Person in charge of the protection of personal information. To exercise any of your rights, ask questions, comments or file a complaint regarding this Policy or our handling of your personal information, please contact BSP's Person in charge of the protection of personal information at:

C/O: Me Isabelle F. LeBlanc, Secretary and Director of Legal Affairs Person in charge of the protection of personal information

Bureau de la sécurité privée

1611 Crémazie Boulevard East, suite 500 Montréal (Québec) H2M 2P2

Toll free: 1 877 748-7483

Email address: aiprp@bspquebec.ca



9. How can the BSP update this Policy?

Amendment process. The adoption date and the date of the last update of this Policy are indicated in the header of its first page. This Policy is subject to modification to reflect changes in rules and practices regarding personal information, among others. In order to materially amend this Policy, the BSP will post a notice of amendment in the section of the Website dedicated to this Policy and to notices of amendment, which is accessible via the following hyperlink: https://www.bspquebec.ca/en/33/privacy-policy. The content of any notice of amendment will come into force at the end of the fifteenth (15th) day following the date of its publication on the Website, subject to reasons justifying a shorter period.

The most recent former version of the Policy and the corresponding notice of amendment, if any, will also be available in the section of the Website dedicated to this Policy and notices of amendment, which is accessible via the following hyperlink:

https://www.bspquebec.ca/en/33/privacy-policy.



Appendix 1
Summary table of Digital markers used by the BSP

| Digital marker's supplier | Digital marker's name | Stated purpose of the Digital marker | Digital marker's activity length | Relevant documentation related to the Digital marker | | |
|---------------------------------|---|--|----------------------------------|--|--|--|
| For the https:/ | For the https://www.bspquebec.ca/fr | | | | | |
| Laravel | Laravel_session | Used to identify a session instance for a user. | 2 hours | Laravel Cameroon's privacy policy: https://laravel.cm/privacy#:~:t ext=Collecte%2C%2Outilisation %20et%2Opartage%2Odes,de% 20t%C3%A9l%C3%A9phone%20 et%20adresse%20postale. | | |
| Google | _gid | Used to count the number of hits on a web page and track the number of hits. | 1 day | Google's privacy policy: https://policies.google.com/pr ivacy?hl=fr-CA How Google uses cookies: https://policies.google.com/te chnologies/cookies?hl=fr-CA | | |
| Google | _gat_UA- 31606506-1 | Used to limit the amount of data stored by Google on busy websites. | 1 minute | | | |
| Google | _ga | Used to distinguish users of a website by assigning them a randomly generated unique number. This cookie collects information about the use of a website by its users. | 1 year and 1 month | | | |



| Digital marker's supplier | Digital marker's name | Stated purpose of the Digital marker | Digital marker's activity length | Relevant documentation related to the Digital marker | |
|---------------------------------|---|--|----------------------------------|---|--|
| Pour le https:// | Pour le https://registre-public.bspquebec.ca/ | | | | |
| Google | _ga | Used to distinguish users of a website by assigning them a randomly generated unique number. This cookie collects information about the use of a website by its users. | 1 year and 1 month | Google's privacy policy: https://policies.google.com/privacy?hl=fr-CA How Google uses cookies: | |
| Google | _ga_7YBGD087L G | Used to maintain session status. | 1 year and 1 month | https://policies.google.com/te chnologies/cookies?hl=fr-CA | |
| BSP | .AspNetCore.Cult ure | Used to identify a session instance for a user. Used for language preference management. | Session | The current policy. | |



Appendix 2

Table of categories of individuals who have access to personal information within the BSP

| File type | PI contained in this file type | Category of employees with access |
|--|--|--|
| Agents (applicant and licence holder) | Personal information allowing the BSP to determine the eligibility of a Data subject to obtain and maintain an agent licence in accordance with the provisions of the <i>Private Security Act</i> (CQLR, c. S-3.5) and its regulations (the "Act") (gender, date of birth, mother's maiden name, driver's licence number, language, status in Canada, physical and mental conditions, governmentissued photo ID, profession or main occupation, employer's name and contact information, training and employment certificates, documents demonstrating equivalency of training, information on judicial history and good moral character). Personal information allowing the BSP to identify a Data subject as a respondent capable of confirming the identity of a licence applicant by authenticating their photo (surname, first name and contact information (street address, email address, phone number) occupation, relationship to the applicant. | |
| Agencies (applicants and licence holder) | Personal information allowing the BSP to determine the eligibility of the enterprise for which you are a representative, or a related person whose information is required under the Act, to obtain and maintain an agency licence in compliance with the provisions of the Act | Authorized employees of the Licensing and Information Department (except for information on security checks for the data entry and information services teams) Authorized employees of the Finances and Administration Department (except for information on security checks) |



| File type | PI contained in this file type | Category of employees with access |
|--------------------------------|--|---|
| | (surname, first name, date of birth, residential contact information, interest in the enterprise. | Authorized employees of the Legal Affairs Department Authorized employees of the Investigations and Inspections Department |
| Investigations and inspections | Any personal information that the Data subject is required or invited to provide that is necessary to conduct of an investigation or inspection in accordance with the PSA. | Authorized employees of the Investigations and Inspections Department Authorized employees of the Legal Affairs Department, when needed |
| BSP employees and applicants | Personal information provided as part of the job application to the BSP (surname, first name, contact information (street addresses, email addresses, telephone numbers), gender, date of birth, languages spoken, education information, work experience and professional affiliations)). Personal information that you are required or invited to provide to the BSP considering the nature of your relationship (social insurance number and financial information for employees). | Person responsible for human resources Authorized employees of the Finances and Administration Department, limited to the payroll management software Directors with respect to employees under their supervision |
| Suppliers and bidders | Personal information allowing the BSP to verify the supplier's experience and competence, as well as those enabling security checks conducted before and during the business relationship (surname, first name, date of birth, driver's licence number, certificates of training, declaration of clients or employers, documents, information on judicial history and good moral character). | Authorized employees of the Finances and Administration Department Authorized employees of the Legal Affairs Department |



| File type | PI contained in this file type | Category of employees with access |
|-----------------|---|--|
| Digital markers | Information collected by the Digital markers listed in Appendix 1 and information that is automatically collected when using the Website and Platforms. | Authorized employees of the Quality Insurance Team of the Finances and Administration Department Authorized Communications Services employees |
| User accounts | Information collected when creating a user account on one of the BSP's Platforms. | Authorized employees of the Quality Insurance Team of the Finances and Administration Department Authorized employees of the Licensing and Information Department |