

Website Privacy Policy

1. General Information

a) Introduction

Privacy is important to DK-Spec inc. (hereinafter "**Entity**", "**We**", "**Our**"). For this reason, We have implemented safeguards and sound management practices for your Personal Information in accordance with applicable laws.

This privacy policy (the "**Policy**"), which should be read in conjunction with our Terms and Conditions, describes our practices regarding the collection, use, processing, disclosure, and retention of Personal Information of our clients, visitors, and users.

By using our website <https://www.dkspec.com/> (the "**Website**") or any of our Services, you agree that We may collect, use, process, disclose and retain 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 may not visit, access or use our Website or Services or share your Personal Information with us.

This Policy does not apply to the Personal Information of the Entity's employees, representatives and consultants, or any other person affiliated with the Entity, or to any information that is not Personal Information as defined by applicable law.

b) Data Protection Officer

Questions, comments and complaints regarding the Entity's Privacy Policy and practices may be directed to our Data Protection Officer at the following coordinates:

Phone: (888) 686-3847

Email: privacy@dkspec.com

Address: 1060 chemin Olivier, Lévis (Québec) G7A 2M8

2. Definitions

The following words and expressions, when capitalized in the Policy, have the meanings set out below, unless otherwise implied or expressed in the text:

"Service Provider" means any individual or entity that processes data on behalf of the Entity. This includes third party corporations or individuals employed by the Entity to facilitate the Services, provide the Services on behalf of the Entity, perform services related to the Services or assist the Entity in analyzing the use of the Services.

"Personal Information" means any information about an individual that is personally identifiable, that is, that directly or indirectly reveals something about the individual's identity, characteristics (e.g. abilities, preferences, psychological tendencies, predispositions, mental abilities, character

and behaviour) or activities, regardless of the medium in which it is held or the form in which it is made available (e.g. in writing, graphically, aurally, visually, by computer or otherwise).

"Data Protection Officer" means the person who is accountable for the administration of this Policy and whose contact information is identified in Section 1 of this Policy.

"Services" means the website.

3. Processing of Personal Information

3.1 Collection of Personal Information

As part of our business, We may process various types of Personal Information including the information listed below:

- contact information, such as your first and last name, address, email address and telephone number
- information you choose to provide or share with us, for example, when you fill out a form, respond to surveys, apply to one of Our job offers or contact one of Our employees or representatives;

In each case, such Personal Information is processed in accordance with the legitimate and necessary purposes listed in Section 3.2 below.

3.2 Use of Personal Information

We may use your Personal Information for the legitimate purposes described below:

- operating, maintaining, supervising, developing, improving and providing all features of Our Website;
- to provide you with products and Services;
- develop new products and improve our Services;
- to 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 these purposes;
- to answer your questions and provide you with assistance when needed;
- to collect opinions and feedback regarding Our products or Services;
- to conduct research and analysis related to Our business, products and Services;
- detect and prevent fraud, error, spam, abuse, security incidents and other harmful activities;
- to send you communications as required by law;
- for any other purpose permitted or required by law.

3.3 Disclosure of Personal Information

We may disclose your Personal Information to Our employees, contractors, consultants, agents, Service Providers and other trusted third parties (collectively, **"Service Providers"**), who require such information to assist us in operating Our Website, conducting Our business or servicing you,

provided that such Service Providers have previously agreed in writing to maintain the confidentiality of your Personal Information in accordance with applicable laws and Our Information Governance Program.

We do not sell, trade, or otherwise disclose your Personal Information to third parties.

3.3.1 Service Providers and Other Third Parties

While We try to avoid sharing your Personal Information with third parties, 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. We have defined below the instances in which such sharing may occur:

- We use YouTube to present Our products and Services. Consult Google's privacy policy; <https://policies.google.com/privacy>
- We use the services of Facebook to communicate Our activities and present Our products and Services. Consult Meta's privacy policy; <https://www.facebook.com/privacy/policy/>

Before We disclose your Personal Information to Service Providers, we proceed with a Privacy Impact Assessment. When We disclose your Personal Information to Service Providers, We enter into written contracts with them before your Personal Information is disclosed to them and We only provide them with the Personal Information necessary to perform their mandate. As part of these contracts with our Service Providers, we are committed to the principles set out in this Policy and these Service Providers are required to use Personal Information as directed by us and only for the purposes for which it was provided. In addition, these Service Providers provide us with sufficient assurances that they will implement appropriate safeguards that are proportionate to the sensitivity of the Personal Information being processed or disclosed. When Our Service Providers no longer need your Personal Information, we require them to destroy such data in an appropriate manner.

3.3.2 Compliance with Legislation, Responding to Legal Requests, Preventing Harm and Protecting Our Rights

We may disclose your Personal Information when We believe that such disclosure is authorized, necessary or appropriate, including:

- to respond to requests from public and governmental authorities, including public and governmental authorities outside your country of residence;
- to protect Our activities;
- to comply with legal process;
- to protect Our rights, privacy, safety, property, or those of you or others;
- to allow us to pursue available remedies or limit the damages we may suffer; and
- in accordance with applicable laws, including laws outside your country of residence;

3.3.3 Business Transactions

We may share, transfer or disclose, strictly in accordance with this Policy and the provisions of the *Act Respecting the Protection of Personal Information in the Private Sector*, RLRQ c P-39.1 (“**Private Sector Law**”) and the *Act to Modernize Legislative Provisions as Regards the Protection of Personal Information*, LQ c 25 (“**Law 25**”), your Personal Information in the event of a sale, transfer or assignment, in whole or in part, of the Entity 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 such cases, we will notify you before your Personal Information is transferred and will be governed by a different privacy policy.

3.4 Consent for Personal Information

Wherever possible, the Entity obtains consent directly from the individual for us to collect, use and disclose their Personal Information. However, if you provide us with Personal Information about other individuals, you must ensure that you have properly notified them that you are providing their information to us and have obtained their consent to such disclosure.

We will seek your express consent before using or disclosing your Personal Information for purposes other than those set out herein.

3.5 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 it was collected, unless you consent to your Personal Information being used or processed for another purpose. For information purposes only, some information may be retained for up to 7 years following the termination of the Services rendered by the Entity to you. In addition, our retention periods may be modified from time to time due to legitimate interests (for example, to ensure the security of Personal Information, to prevent abuse and breaches or to prosecute criminals).

For more information about the periods for which your Personal Information is retained, please contact our Data Protection Officer using the contact information provided in Section 1(b) of this Policy.

4. Your Rights

As the person concerned, you may exercise the rights set out below by contacting to Our Data Protection Officer in writing at the contact information provided in section 1(b) of this Policy:

- You have the right to be informed of the Personal Information We hold about you and to request a paper copy of the documents containing your Personal Information, subject to the exceptions provided by applicable law;
- You have the right to have the Personal Information we hold about you corrected, amended and updated if it is incomplete, ambiguous, out of date or inaccurate;

- You have the right to withdraw or change your consent to the Entity's collection, use, disclosure or retention of your Personal Information at any time, subject to applicable legal and contractual restrictions;
- You have the right to request that we cease disseminating your Personal Information and de-index any links to your name that provide access to your Personal Information if such dissemination is contrary to law or a court order;
- You have the right to request that your Personal Information be disclosed to you or transferred to another organization in a structured, commonly used technological format;
- You have the right to make a complaint to the Commission d'accès à l'information, subject to the conditions set out in the applicable law.

In order to comply with your request, you may be asked to provide appropriate identification or otherwise identify yourself.

5. Cookies and Other Tracking Technologies

We do not use Cookies and other similar technologies (collectively, "**Cookies**") to help us operate, protect, and optimize the Website and the Services we offer. Cookies are small text files that are stored on your device or browser. They collect certain information when you visit the Website, including your language preference, browser type and version, the type of device you are using, and the unique identifier of your device.

6. Security Measures

The Entity has implemented physical, technological, and organizational security measures to adequately protect the confidentiality and security of your Personal Information against loss, theft or unauthorized access, disclosure, copying, communication, use, modification. These measures include encryption, access control, segregation of duties, internal audit, the "Secure Socket Layer (Protocol SSL)" technology, etc.

Despite the measures described above, We cannot guarantee the absolute security of your Personal Information. If you have reason to believe that your Personal Information is no longer secure, please contact our Data Protection Officer immediately using the contact information provided in Section 1(b) above.

7. Changes to this Privacy Policy

We reserve the right to change 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 date in the footer of the Policy. We will also notify you by email at least thirty (30) days before the effective date of the new version of our Policy. 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 do not continue to use our Website or Services after the new version of our Policy becomes effective, your use of our Website and Services will be governed by the new version of the Policy.

8. Links to Third Party Websites

From time to time, We may include on Our Website references or links to websites, products or services provided by third parties ("**Third Party Services**"). These Third Party Services, which are not operated or controlled by the Entity, are governed by privacy policies entirely separate and independent from Ours. We therefore have no responsibility or liability for the content and activities of these sites. This Policy applies only to the Website and the Services We offer. The Policy does not extend to any Third Party Services.

9. Information About Your Privacy Rights Under the General Data Protection Regulation (GDPR)

For the purposes of this Privacy Policy, We act as the controller of your Personal Information. If you are from the European Economic Area (EEA), Our legal basis for collecting and using your Personal Information, as described in this Privacy Policy, depends on the information We collect and the specific context in which We collect it. We may process your Personal Information because:

- We need to perform a contract with you, such as when you use Our Service;
- You have given us permission to do so;
- The processing is in Our legitimate interest and it does not override your rights;
- To comply with the law.

If you are resident in the European Economic Area (EEA), you have certain rights to protect your Personal Information. In certain circumstances, you have the following protection rights:

- The right to access, update or delete the Personal Information We have about you;
- The right to rectification;
- The right to object;
- The right to restriction;
- The right to portability;
- The right to withdraw your consent from the data.

Please note that We may ask you to verify your identity before responding to these requests.

You have the right to complain to a Personal Information protection authority about Our collection and use of your Personal Information. For more information, please contact your local data protection authority in the European Economic Area (EEA).

10. Individuals Under the Age of 14

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

11. Governing Law

The laws of Canada and Quebec, 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.

12. Contact Us

Any questions, comments, requests, or concerns regarding this Privacy Policy should be directed to Our Data Protection Officer:

By email: privacy@dkspec.com (Attention: Data Protection Officer)

By mail: 1060 chemin Olivier, Lévis (Quebec) G7A 2M8 (Attention: Data Protection Officer)