

## **Policy last updated May 1, 2024**

### **1. Purpose**

Comact is committed to protecting the privacy and security of individual's personal information and complying with all applicable privacy laws in the jurisdictions in which we operate.

For the purposes of this Policy, "Comact" means BID Group Holdings Ltd., BID Group Technologies Ltd. dba "Comact Technologies", BID Group Construction Ltd. dba "Comact Project Services", BID Group Technologies US Inc. dba "Comact Technologies", and BID Group Construction US Inc. dba "Comact Project Services" and their affiliates and subsidiaries.

This Privacy Policy (the "Policy") describes how we may collect, use, disclose, retain, dispose of and otherwise process (collectively, "process"), and how you may correct, update and access, your Personal Information that you provide as a user of, or that we may collect through, (a) our website found at [www.comact.com](http://www.comact.com) and related websites (collectively, the "Website"), (b) our OPER8 software-as-a-service/cloud-hosted software solution and all related applications, websites, portals, local software and other technology services (collectively, the "Solution"), and (c) the products, services, software and tools we provide through the Website or the Solution (collectively with the Website and the Solution, the "Services"). For clarity, any reference to the "Services" includes a reference to any part or aspect of the Services.

This Policy does not apply to our employees' Personal Information, Business Contact Information, anonymized information, or other information exempted from applicable privacy laws.

This Policy references our OPER8 End User Licence Agreement and Terms of Service available on the main page at <http://www.comact.com/> or delivered to you by email prior to your use of the Solution, and forms and integral part thereof.

**PLEASE READ THIS POLICY CAREFULLY.** By using or accessing our Website or the Solution, or otherwise by choosing to provide us with your Personal Information, you acknowledge and consent to us processing your Personal Information in Canada and elsewhere in accordance with this Policy and as may be further identified when the Personal Information is collected. If you do not consent to the processing of your Personal Information, please do not access, or continue to use the Website, the Solution or any of our Services, or otherwise provide any Personal Information to us.

## **2. Definitions**

**Business Contact Information:** Any information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.

**Personal information:** Any information about an identifiable individual or any information that can be used, either alone or in combination with other information, to identify an individual (for example, an individual's name, mailing address, telephone number and email address). Personal Information does not include Business Contact Information, information which has been anonymized so as not to be associated with an identifiable individual, or other information that is exempted by applicable privacy laws.

**Employee Personal Information:** Any Personal Information that is collected, used, or disclosed solely for the purposes reasonably required to manage or terminate an employment relationship. This Policy does apply to job candidate Personal Information that is submitted to us. Please see details below.

## **3. Collection of Personal Information**

The types of information we receive and collect depends on how you use our Services. Our Services have optional features which, if used, require us to collect additional information to provide such features. You will be notified of such collection, as appropriate. If you choose not to provide the information needed to use a feature, you will be unable to use the feature.

**Directly Collected Personal Information:**

When you use our Services or apply for jobs with us, we may collect the following Personal Information from you:

Contact information, such as first and last name, email address, mailing address and phone number;

Company information, such as company name, position, company email address, company mailing address, and company phone number;

Location information, such as city, province, state, territory, and country;

Employment-related information, such as academic and professional/employment experience, work eligibility,

Unique identifies, such as username, account number and password; and

Any other information you voluntarily provide through our Services.

Your Personal Information may be collected when:

You fill out free-form fields on our Website;

You interact with us through the Services;

You communicate with us by phone or email; and

You otherwise use our Services.

We only collect Personal Information that we need. We encourage you not to provide us with any Personal Information beyond what is necessary and as requested by us.

### **Automatically Collected Personal Information**

We, and our third-party partners, may also automatically collect information about you and any computer or device you use to access our Services, read our emails, or otherwise engage with us. Some of the information we may collect, and ways we may collect it include:

**Cookies.** When you visit or use the Website, we may send one or more cookies – small text files containing a string of alphanumeric characters – to your computer or device that allows us to uniquely identify your browser, computer or device. Cookies allow us to collect standard Internet log information about how and when you access and use our Website, including your IP address, unique device identifiers, location data, weblogs, time zone, date, your language preferences, browser settings and browsers used, web addresses visited, links clicked, other communication data, searches conducted, and pages visited. We use cookies for a number of purposes, including to: ensure the Website is optimized for your use and for future communications between you and us; track your preferences you specify while using the Website; assist us to maintain and manage your status as logged in or logged out while you are using the Website; estimate and report our total audience size and traffic; and conduct research to improve our content, products and services. We may also use cookies and other technologies in online advertising campaigns to track responses to our ads. You can manage cookie preferences in your browser’s settings, but please note that if you refuse to allow cookies, you may not be able to use certain features or functionality of our Website.

**Log Files.** We may record log file information each time you access the Website. This information may include information such as: your IP address; browser type; unique device identifiers; information about your computer or device; number of click; how you interact with links, features, or functionalities on the Website; and other such information.

**Usage Data.** We may also collect information about the way you use our Website and/or Services. For example, the site from which you came and the site to which you are going when you leave our Website, the pages you visit, the links you click on, how frequently you access our Website, whether you open emails or click the links contained in emails, whether you access our Website from multiple devices, last login time, and other actions you take on our Website. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Website.

## **Collection from Third Parties**

We do not knowingly collect your Personal Information from any third parties, unless you consent or we are otherwise exempted, authorized, or required by applicable laws to do so. For example, we may collect your Personal Information from the following third parties:

### **Your authorized representative(s);**

Organization(s) that you previously provided consent to in respect of their collection of your personal information; or

Public sources in which your personal information is publicly available.

If we collect your Personal Information from a third party, we will process that information for the purpose for which it was provided to us in accordance with this Policy and the policy under which that information was collected and may also process it as otherwise permitted by applicable law or under this Policy.

## **Links to Third Party Sites and Services**

Our Services may contain links to other websites, applications, or Internet resources (“Third-Party Services”) which are provided or made available solely for your convenience and information. When you click on one of those links you are contacting those Third-Party Services. We do not endorse and have no responsibility or liability for, nor do we have any control over, those Third-Party Services, their content, or their processing of your Personal Information. We encourage you to read the privacy policies of those Third-Party Services to learn how they process your Personal Information.

## **4. Purposes for Which Personal Information is Processed**

We may process your Personal Information for the following purposes:

To verify and authenticate your identity;

To operate, maintain and provide to you the Services and all features and functionality of the Website and Solution;

To ensure the Services are optimized for your use and benefit;

To analyze user experience and improve the Services;

To provide you with requested information, process your questions and/or answer your queries;

To maintain accurate records;

For recruiting and hiring purposes, including considering your candidacy for employment and/or suitability for a position

To communicate with you to provide you with information about us (including news releases, newsletters and notices regarding upcoming promotions or events);

To solicit feedback from you about your satisfaction and experience with our Services (including through occasional surveys);

To carry out our obligations arising from any contracts or transactions entered into between you or organization and us;

To comply with internal policies and procedures and other legal, accounting or security requirements;

To protect us, yourself and other from fraud an error, and to safeguard our business interests;

To collect debts owed to us;

To manage or transfer our assets or liabilities (for example, in the case of an acquisition or merger, the provisions of security for a credit facility or the change of a supplier of products or services); and

## **Privacy Policy**

### **PRIVACY POLICY – MAY 1, 2024**

To share your Personal Information with our employees, contractors, consultants and other third-party service providers, such as hosting providers, advertising agencies, payment processors or customer service agencies (“Third-Party Processors”) who require this information to assist us with establishing, maintaining and managing our relationship with you, and optimizing or providing the Services of your use and benefit. Please note that we may change or add Third-Party Processors at any time, in our sole discretion, either in Canada or elsewhere.

We will not process your Personal Information for other purposes without your consent, except where authorized or require by law.

### **5. Disclosure of Personal Information**

We will not share your Personal Information with any third party, except as indicated in this Policy or as authorized or required by law.

We may disclose your Personal Information for the purposes as described in this Policy in the following ways:

To our employees, contractors, and agent on an as-needed basis;

To our affiliated and business partners;

To our service providers (as discussed above);

To law enforcement, government or regulatory bodies, or other lawful authorities, as strictly required by law; and

To third parties, in accordance with applicable law, in connection with a corporate reorganization, a merger or amalgamation with another entity, or a sale of all or a substantia portion of our assets or securities, provided by that the disclosed information continues to be used solely for the purposes permitted by this Policy by the entity acquiring the information.

### **6. Legal Basis for Processing of Personal Information**

We will process your personal information only with your knowledge and consent, except where exempted, authorized or required by applicable laws. The form of consent may vary depending on the circumstances and the type of information being requested. Your consent may be express, with clear options to say “yes” or “no” (such as by being asked to check a box to indicate your consent), or implied ( such as when you provide us with your address through a form or email seeking information and we use those means to respond to your request). Your consent can also

be provided by your authorized representative. Taking into account the sensitivity of your personal information, purposes of collection, and your reasonable expectations, we will obtain the form of consent that is appropriate to the personal information being processed. When we process your personal information for a new purpose, we will document that new purpose and ask for your consent again.

You may refuse to provide consent or may notify us at any time that you wish to withdraw or change your consent to the processing of your personal information without penalty, subject to legal, contractual or other restrictions and reasonable notice, by opting out of the use of your personal information by contacting our Privacy Officer (see Section 12 below). However, if you withdraw or change your consent, we may not be able to provide you with the Services.

Aside from consent, we may also process your personal information under other legal bases, as permitted by applicable laws.

### **7. Cross-Border Data Transfers**

Where applicable law permits, we may, for the purposes described in this Policy, transfer Personal Information we collect to the United States and other jurisdictions that may not be deemed to provide the same level of privacy protection as Canada.

The measures we use to protect Personal Information are subject to the legal requirements of the jurisdictions to which we transfer Personal Information, including lawful requirements to disclose information to law enforcement and government agencies in those jurisdictions.

### **8. Security of Personal Information**

The security of your Personal Information is important to us. We protect the Personal Information in our custody or under our control using reasonable physical, technological and organizational safeguards designed to prevent unauthorized access, collection, use, disclosure, copying, modification, destruction or similar risks.

We will take reasonable measures, through contractual or other reasonable means, to ensure that our service providers implement a comparable level of protection.

However, no method of transmission over the Internet, or method of electronic storage, is completely secure. As such, despite our safeguards and protocols, we cannot fully guarantee the security of your Personal Information and you should always exercise caution when disclosing Personal Information over the Internet.

## **9. Privacy Rights and Choices**

### **Accessing Your Personal Information**

You have a right to access your Personal Information that we hold.

Upon your written request, we will provide you your Personal Information in our possession or under our control. We will also provide you information about the ways in which that information is being used and a description of the individuals or organizations to whom that information has been disclosed. We may charge you a reasonable fee for doing so.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Information is not disclosed to any person who does not have a right to receive it.

Access may be declined where authorized or required by applicable law. If access cannot be provided, we will notify the individual making the request within 30 days, in writing, of the reasons for the refusal.

### **Correcting Your Personal Information**

We will make a reasonable effort to ensure that Personal Information we are using or disclosing is accurate and complete.

If you demonstrate the inaccuracy or incompleteness of your Personal Information, we will amend the information as required. If appropriate, we will send the amended information to third parties to whom the information has been disclosed.

If a challenge regarding the accuracy of your Personal Information is not resolved to your satisfaction, we will annotate the Personal Information in our possession or under our control with a note that the correction was requested but not made.

## **10. Retention of Personal Information**

We will delete, destroy, erase, aggregate or make anonymous documents or other records containing Personal Information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer required for a legal or business purpose.

We will keep Personal Information used to make a decision affecting you for at least one year after using it to make the decision.

## **11. Updates or Changes to this Policy**

This Policy was last updated as of the “Last updated” date set out at the beginning of this Policy.

We may update this Policy from time to time to ensure ongoing compliance with applicable laws and for any other purpose that we deem reasonably necessary. We therefore encourage you to periodically review this Policy to ensure you are aware of any changes.

If we make any material changes, we will either (a) notify you by email (sent to the email address listed in our records), or (b) provide a notice on the Website or Solution before the change becomes effective. Any changes to this Policy will apply to existing information, as well as information collected after the date that this Policy is posted or on the date as specified in the notification. Your continued use of the Services following the effective date of any changes to this Policy signifies your acceptance of such changes.

## **12. Contact Information for Privacy Officer**

If you have any questions or concerns about this Policy or our processing of your Personal Information, you may contact our Privacy Officer at:

**Stéphane Desjardins, Privacy Officer and Senior Vice President, Technology**  
**18095, rue Lapointe**  
**Mirabel Québec J7J 1E3**  
**Canada**  
**[privacy.officer@comact.com](mailto:privacy.officer@comact.com)**

If you are not satisfied with our Privacy Officer’s response your question or concern, you may be able to file a complaint under applicable privacy laws. Our Privacy Officer will provide you with the contact information to do so if requested.