



GOVERNANCE RULES AND CONFIDENTIALITY POLICY OF PROMENT CORPORATION REGARDING THE PROTECTION OF PERSONAL INFORMATION

PREAMBLE

The purpose of these rules of governance and the confidentiality policy regarding the protection of personal information (the "Policy") is to determine the principles that Proment Corporation and its representatives will follow when collecting, using, communicating, retaining and destroying personal information.

Among other things, the Policy provides a framework for Proment Corporation's obligations, particularly with respect to the roles and responsibilities of the person responsible for access to and protection of personal information (the "PPI Manager") and his or her employees in handling personal information. The rights of persons concerned by personal information collected, used, communicated, retained, and destroyed by Proment Corporation are contained in the Policy, as is the process for handling complaints relating to the protection of personal information.

The Policy applies to all personal information relating to customers, suppliers, platform users, staff, and employees (the "Data Subjects").

1. CONSENT

By visiting or using the Proment Corporation's website or otherwise communicating with us, including to obtain information or conduct a transaction on properties for sale or rent, you agree to be bound by this Policy and consent to the collection, use, disclosure, retention, and destruction of your personal information as described in the Policy.

2. RESPONSIBILITIES OF PROMENT CORPORATION AND THE PERSON RESPONSIBLE FOR THE PPI

Proment Corporation is responsible for the protection of personal information in its possession, whether it is held by Proment Corporation or by a third party, and regardless of the form in which it is held (written, graphic, sound, visual, computerized, or other).

As such, Proment Corporation takes appropriate security measures to protect such information in a manner commensurate with its sensitivity, and has adopted this Policy.

The PPI Manager of Proment Corporation ensures that these rules and Proment Corporation obligations regarding the protection of personal information are respected and implemented. In particular, he participates in the prevention and appropriate management of privacy incidents, the complaint handling process and Privacy Impact Assessments ("PIAs") as required.

3. CHANGES TO THE POLICY

Proment Corporation reserves the right to make changes to the Policy at any time by notifying its users on this page and/or by sending a notice to the Persons concerned through any contact information at our disposal. It is recommended that you consult this page regularly, referring to the date of the last modification. If the modifications affect the initial consent, Proment Corporation will collect a new consent, if necessary.

4. THE INFORMATION WE COLLECT

Proment Corporation only collects personal information that is required to carry out its real estate development activities in the Proment Corporation. For example, this may include information collected to subscribe you to our mailing list or to obtain information. Your information may also be used to invite you to our events.

We collect the following information, in whole or in part, when you use our platforms or otherwise communicate with us.

- a. First and last name
- b. Phone number
- c. E-mail
- d. Personal mailing address

5. ACCURACY OF PERSONAL INFORMATION

We are committed to keeping your personal information accurate, complete and up to date. If your information changes, please notify us immediately so that we can make the necessary changes.

6. ACCESS AND RECTIFICATION

To access or obtain a copy of the personal information we hold about you, or to have inaccurate personal information amended, you may send us a written request. You may also ask how this information is used and ensure that it is accurate and complete, and update it if necessary, to the extent permitted by law.

7. SECURITY MEASURES

Proment Corporation maintains strict security measures to protect your personal information from unauthorized access, use, disclosure, modification, loss, theft, or any other breach of security. The information we collect is protected by computer security measures that are reasonable considering its sensitivity.

Physical and physical security measures include:

- Access-controlled offices and locked filing cabinets;
- restricting access to your personal information to a select group of people;
- written contractual obligations with third parties who require access to your personal information, requiring them to protect, through security measures, the confidentiality and security of your personal information and to use it only for the purposes of the contract, mandate, or service they are performing.

Computer security measures include:

- the use of passwords;
- regular review of our security practices;
- regular upgrading of our technological equipment;

8. DISCLOSURE TO THIRD PARTIES

Personal information is used and communicated for the purposes for which it was collected and with the consent of the person concerned. In certain cases, provided for by law, personal information may be used for other purposes, for example, to detect and prevent fraud or to provide a service to the person concerned.

Proment Corporation may be required to disclose personal information to third parties, for example, suppliers, contractors, subcontractors, agents.

Proment Corporation may, without the consent of the person concerned, communicate personal information to a third party if such communication is necessary for the execution of a mandate or a contract for services or business. In such cases, Proment Corporation will draw up a written mandate or contract in which it will indicate the measures to be taken by its agent to ensure that the personal information entrusted to it is protected, that it is used only for the purposes of the mandate or contract and that it is destroyed once the mandate or contract has ended. The co-contractor must also undertake to cooperate with Proment Corporation in the event of a breach of confidentiality of personal information.

Before disclosing personal information outside Quebec, Proment Corporation considers the sensitivity of the information, the purpose for which it is to be used and the safeguards that will be in place outside Quebec. Proment Corporation will only disclose personal information outside Quebec if its analysis demonstrates that the information will be adequately protected in the location where it is to be disclosed.

9. WITHDRAWAL OF CONSENT

You may change or withdraw your consent to the collection, use and disclosure of your personal information at any time by sending written notice to the PPI Manager. We will process your request as soon as possible.

10. DESTRUCTION OR ANONYMIZATION

Once the purposes for which the information was collected have been fulfilled, Proment Corporation will securely destroy or anonymize the information as permitted by law in order to use it for serious and legitimate purposes. In this respect, Proment Corporation's professional obligations require it to keep its files for at least ten (10) years following their final closing.

11. CONFIDENTIALITY INCIDENT

A privacy incident is any access, use or disclosure of personal information that is not authorized by law, or any loss or other breach of the protection of personal information.

Proment Corporation has established a protocol for managing a privacy incident, which identifies the persons who assist the Privacy Officer and sets out the concrete actions to be taken in the event of an incident. This protocol sets out the responsibilities expected at each stage of incident management, including the measures to be taken to ensure data security.

12. EVALUATION PROCESS

Proment Corporation will carry out a PIA assessment in the event of any acquisition project or redesign of our computer systems involving personal information. This will be done in consultation with the PPI Manager, based in particular on the sensitivity of the information concerned, its quantity and its purpose.

13. COMPLAINTS AND PROCESSING

Any Person concerned by personal information collected, used, communicated, or retained by Proment Corporation may file a complaint with the PPI Manager. The complaint must be made in writing and must indicate the nature of the facts complained of the date on which the incident occurred, and the expectations as to the outcome of the complaint. The PPI Manager will acknowledge receipt of the complaint and process it within a maximum of 20 days.

Quartier Pointe investigates all privacy complaints and takes appropriate measures to resolve them. For further information on how we handle personal information, please contact :

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