

PRIVACY POLICY

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1. CONTEXT

Predictive Maintenance Corporation (“**PMC**”, “**Organization**”, “**We**”, “**Us**”, “**Our**”) values and respects privacy and recognizes that it must maintain and use personal information responsibly. This *Privacy Policy* (“**Policy**”) applies to interactions with PMC and aims at demonstrating our firm commitment to privacy and the security of personal information.

Any changes to this Policy will be posted on our website. Our *Confidentiality Policy* should be reviewed to get a full understanding of our practices [<https://www6.tribologik.com/en/privacy>].

This Policy is intended to inform about:

- PMC practices in regard to the collection, use, holding and communication of personal information;
- The framework followed for the keeping and destruction of personal information;
- The roles and responsibilities of PMC personnel throughout the life cycle of personal information;
- The process for dealing with complaints regarding the protection of personal information.

2. DEFINING PERSONAL INFORMATION

For the purposes of this Policy, personal Information is information that identifies, directly or indirectly, or could be reasonably associated with, an individual. It could be a name, address, e-mail address, telephone number, etc.

3. COLLECTION OF PERSONAL INFORMATION

We collect information when we have a valid reason to do so. The collection is limited to that which is necessary to fulfill the purpose for which it is collected.

Generally, we collect personal information directly from individuals. Some examples of direct collection of personal information are: (a) contacting us or signing up to our marketing communications, (b) communicating with us by telephone, e-mail or otherwise, (c) filling out an employment application.

We may collect personal information from third parties. This collection through third parties may be necessary to use certain services, or to otherwise do business with us.

In the event that such information is not collected directly from an individual, the latter may request the source of the information collected by us.

4. USE OF PERSONAL INFORMATION

We only use personal information for the purposes generally identified herein or for any other purposes provided at the time of collection. When required, we will obtain your consent to use the information.

We ensure that the information we hold is current and accurate at the time we use it to make a decision that concerns individuals.

5. OUR PURPOSES WHEN COLLECTING, USING AND HOLDING PERSONAL INFORMATION

We hold and use personal information for the following limited and specific purposes:

Providing our services. We use and hold personal information in order to provide our services, such as

- Verifying individual's identity;
- Taking, verifying or updating instructions;
- Determining eligibility for a product, service or other;
- Administering accounts, fulfilling requests and responding to inquiries.

Managing and developing our operations. We use and hold personal information to manage our operations, for instance

- Deploying and managing our information technology applications and systems, including managing our website;
- Notifying individuals of changes to our services, terms, conditions or policies and providing with administrative messages, updates, legal notices, technical notices or security alerts;
- Processing employment applications;
- Meeting our contractual, legal and regulatory obligations;
- Protecting ourselves and third parties from errors and fraud;

Marketing. If individual has consented to receive such information, we may use their information for marketing purposes.

If an individual no longer wishes to receive this type of communications, they must let us know by following the directions provided to unsubscribe in our communications, or by contacting us as indicated in the section "Requests and Complaints Handling Process" below.

We may continue to communicate with individuals to provide them with important information unrelated to marketing, for instance information about their employment, account or services.

Conducting research and analytics. We may use personal information in order to conduct research and data analytics for the following purposes:

- Understanding our customers' interests and priorities and tailoring our offering;
- Measuring the effectiveness of our services, events, activities, and marketing;
- Understanding how visitors interact with our website and improve its performance;

We may use personal information for secondary purposes or for any other purposes to which individuals may have consented.

6. COMMUNICATION OF PERSONAL INFORMATION

We may communicate personal information to third parties for processing on our behalf. In such cases, we have written contracts with these partners, ensuring the protection of the individuals' privacy and the security of personal information.

We will not communicate personal information to any third party without prior consent, unless permitted or required by law or as necessary for the purposes provided upon collection.

7. THIRD PARTIES & THIRD-PARTY WEBSITES; COOKIES AND OTHER TRACKING TECHNOLOGIES

This Policy applies only to personal information collected, used, held, communicated or otherwise processed by or on behalf of our Organization. We may include links or plug-ins in our website to third-party sites or services that we do not control such as links to social media. Such third-party organizations follow their own practices and we encourage you to review their privacy policies.

It may be possible for us to access information on individuals' use of these links and plug-ins. We may also obtain and use analytical and statistical information from third parties to help us measure performance and effectiveness of content we display.

Please consult our *Confidentiality Policy* [<https://www6.tribologik.com/en/privacy>] for information on our use of cookies and other tracking technologies.

8. STORAGE OF PERSONAL INFORMATION

Our physical records are typically kept at our corporate headquarters in Montréal, Québec. Electronic records are maintained on servers and storage devices situated in that same location.

Some of our service providers may access, use or store personal information outside of the province or territory, or outside of Canada.

For any additional questions concerning the contents of this section, please contact us at the e-mail address provided in the “Requests and Complaints Handling Process” section of this Policy.

9. PROTECTION OF PERSONAL INFORMATION

We strive to apply the necessary and appropriate security measures to ensure the safekeeping of personal information under our protection. In doing so, we follow generally accepted industry standards.

9.1. We limit access to personal information

We have established the roles and responsibilities and access rights of our personnel throughout the cycle of handling personal information, from collection to destruction.

The following types of employees or departments may have access to personal information in the course of their ordinary duties:

- Management;
- Human Resources;
- Payroll;
- Customer Service;
- Sales;
- Information Technology.

Our employees are responsible for the confidentiality of all personal information to which they have access. Employees exposed to or having access to personal information are expected to be familiar with our practices with and comply with this Policy as well as related documents. Management has an added responsibility of enforcing this Policy. Failure to comply with this Policy may result in administrative or disciplinary action.

9.2. We implement robust security measures

We have implemented several types of measures to protect personal information against loss, theft and unauthorized access, use or communication. These measures are adapted to the volume and sensitivity of the information, the purposes for which it is used and the format in which it is stored. They include but are not limited to:

Technological measures like encryption, firewalls, passwords, antivirus software and Secure Sockets Layer (SSL) technology.

Administrative and organizational measures like having a Privacy Officer, practices and policies governing the protection of personal information throughout its life cycle, employee training on privacy, confidentiality and information security. As a condition of employment, all employees are subject to confidentiality agreements, which remain applicable if they leave our Organization.

9.3. We limit the retention of personal information and securely destroy it.

Unless a minimum retention period is required by applicable law, we will retain personal information only as long as necessary for the fulfillment of the purposes for which it was collected.

In many cases, even if an individual no longer has a relationship with us, we must retain their personal information for a certain period to meet our legal obligations. For as long as we hold personal information, we will continue to protect it and ensure its confidentiality.

Once the required retention period has elapsed, we destroy personal information permanently and securely.

10. RIGHTS REGARDING PERSONAL INFORMATION

Subject to certain legal and contractual restrictions, any individual has, among others

- The right to request access to their personal information collected by us;
- The right to request correction of inaccurate information;
- The right to withdraw their consent;
- The right to request the destruction of their personal information;
- The right to have their e-mail address removed from our newsletter mailing list.

Individuals may also ask us

- What personal information we collect from third parties;
- Who has access to their personal information within our Organization;
- How long we keep their personal information.

They may also have other rights in relation to their personal information, such as the right to portability, which allows individuals to request and receive their personal information from one service provider, to then be transferred to another provider in a commonly used, machine-readable format.

11. EXERCISING YOUR RIGHTS

To exercise their rights, individuals are to contact us at the e-mail address specified in the “Requests and Complaints Handling Process” section. It is their responsibility to provide accurate, correct and complete information throughout the process.

An individual can also contact our Privacy Officer for any questions about this Policy and to make any complaint in relation to it, as well as our privacy practices in general. Please refer to the following section.

12. REQUESTS AND COMPLAINTS HANDLING PROCESS

12.1. Applicable procedure

Any individual who wishes to make a request and/or complaint regarding the application of this Policy or, more generally, regarding the protection of their personal information by our Organization, must do so in writing to our Privacy Officer, at the following e-mail address: alexis.tew@industrial-ia.com

They will be asked to provide their name, contact information, including a telephone number, and the subject matter and reasons for the request or complaint in sufficient detail to allow us to assess it. If the request or complaint is not specific enough, we may request additional information deemed necessary to assess the issue.

12.2. Handling of requests and complaints

We are committed to treating all complaints received in a confidential manner.

Within 30 days of receipt of the request or complaint or receipt of any additional information deemed necessary and required by our Privacy Officer to process, we will assess and provide a written response by e-mail or otherwise when required. We will provide reasons where necessary, in particular in the case of a refusal to grant a request.

If the request and/or complaint cannot be processed within this period, the concerned individuals will be informed of the reasons for the extension, the status of the complaint and the reasonable time required to provide a response.

We maintain a separate file for each request and/or complaint received. Each file contains the request, the analysis and documentation supporting its assessment, and the response sent to the person who filed it.

An individual may file a complaint with the *Commission d'accès à l'information du Québec* or any other privacy oversight body responsible for the application of privacy laws. However, we invite any interested individual to first contact our Privacy Officer and wait for the end of the process before contacting any privacy oversight body.

13. APPROVAL AND CONTACT

This policy is approved by PMC's Privacy Officer: alexis.tew@industrial-ia.com