

PRIVACY POLICY

Last Updated: June 3, 2016

1. Preliminary remarks

Elite Management SST inc. ("Elite" or "we") is a company specialized in the health and safety pre-qualification and qualification of subcontractors. To this end, Elite is likely to get some confidential information about organizations and individuals employed or otherwise associated with an organization wishing to retain the services of Elite. At Elite the protection of confidential information is of paramount importance. Therefore this privacy policy (the "Policy"), showing how Elite collects, uses, discloses and protects your confidential information via its website <http://elitemanagementsst.com> (the "Website"), has been implemented. Our practices in respect of your Personal information are consistent with, in particular, the *Law on the Personal information protection and electronics documents Act* (Canada) and the *Act respecting the Protection of Personal Information in the Private Sector* (Quebec).

1. Definitions

For the purposes of this Privacy Policy, "Personal information(s)" means any information concerning the personal or factual circumstances of an identified or identifiable individual. An identifiable person is one who can be identified, directly or indirectly, by reference to one or more factors specific to his physical, physiological, mental, economic, cultural or social features. The concept of Personal Information includes, first and last name, home address, home phone number, cell phone number, email address, date of birth, social insurance number and license number or identification issued by some government or public agencies.

For the purposes of this Privacy Policy, " Confidential information(s)" means any information or document submitted through the Website by an organization within, or resulting from the pre-qualification process, or qualification of the organization bearing the "confidential" or "private" or other similar words clearly indicating that the confidentiality of information must be preserved, including all information and materials regarding finance, customers, suppliers, employees, technologies, processes or business organization and any Personal information. Failure of the organization to indicate a clear statement to the effect that the confidentiality of information must be preserved, Elite will deem, in its sole discretion, if a transmitted information must be considered as confidential or not. Notwithstanding the foregoing, any Personal information is deemed to be confidential information.

2. Confidential information and Personal information gathering

We use confidential information in particular to carry out the assessment of the company for the purposes of prequalification or qualification, as applicable. By providing confidential information on the Website concerning any third party, you represent and warrant to Elite that you previously obtained all necessary or appropriate permissions to communicate this Confidential information in accordance with this Policy. **Notwithstanding the foregoing, Elite will make no specific audit or verification as to your right and your ability to provide such Confidential information and Elite can not be held responsible for any unauthorized or illegal use or disclosure.**

Elite is committed to providing reasonable efforts to protect the Confidential information obtained against inadvertent and unauthorized disclosure, taking the same sensible precautions it takes to protect its own confidential information of similar importance, and always with a degree of prudence at least equal to the one generally practiced in the industry. Notwithstanding the foregoing, Elite will be under no liability for any unauthorized or illegal use or disclosure of Confidential information.

In some circumstances, Elite may ask you to provide certain Confidential information in the pre-qualification or qualification process of your organization on the website, especially when you act as guarantor for an organization. The Confidential information you provide will be used primarily for the following purposes in addition to the purposes expressly designated at the time of entry:

- Conduct pre-qualification and qualification of your organization;
- Process data to make recommendations to the organization following the qualification or pre-qualification;
- Help Elite to ensure the relevance of its Web site by adapting the content to your personal needs;
- Help Elite assess and improve its Web site;
- Identify your language preference;
- Determine your location;
- Establish mechanisms to recover your password in case of loss of it;
- Know your preferences in order to present advertisements that best meet your needs;
- Offer you some training;
- Inform you of any fact or event that might interest you;
- Allow your subscription to our newsletter;
- Enable you to contests entry.

Furthermore, the Confidential information collected by Elite allow us to better address the problems that are reported us, to evaluate and improve the content of our Web Site and to design, improve or market the most suitable offers for the users. This Confidential information is also collected for marketing study.

2. Consent

By providing Confidential information to Elite or its agents, you agree that we may collect, use or disclose said Confidential information in accordance with this privacy policy, with the preferences for the privacy protection you have given us and such permitted or required by law. Any third party to whom confidential information was provided by Elite may use it only for purposes of commercial or philanthropic prospection or for the purposes required by Elite, specified in item 2 above.

Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting us. If you refuse or withdraw your consent, it is possible that we might be unable to provide you or continue to provide you with certain services or information that may be helpful.

3. Accuracy

Confidential Information should be as accurate, complete and current as necessary for the purposes for which they are intended. It is permissible for any organization whose Elite gathered Confidential information to change their record to correct inaccurate, incomplete or misleading information or to delete obsolete information or information not justified by the purpose of the file, have a written comment placed on file.

4. Data protection, privacy and security

Elite maintains physical, electronic and procedural security measures consistent with the requirements of federal and provincial laws, including but not limited to the *Law on the Personal information protection and electronics documents Act* (Canada) and the *Act respecting the Protection of Personal Information in the Private Sector* (Quebec), to protect your Personal information. Please refer to Privacy Policy for any detail concerning this subject.

Notwithstanding the foregoing, the data, including email and Internet communications, network communications, telephone or other electronic device may be intercepted by unauthorized third parties. Your data transmission by such means indicates your acknowledgment and consent that Elite can not be held responsible for such acts by unauthorized third parties.

Elite does not guarantee total efficiency or total security of the Website. It is possible that, among others, hacker manages to penetrate the server. It is important to keep in mind, **before browsing, registering, using your user account or contribute to the website**, that it is always possible that a malicious person accesses the Website servers and uses for its own purposes the information you have disclosed on the Website. **In no event Elite nor any of its directors, officers, employees or agents shall be held responsible for acts of hacking or be blamed for any damage or loss that this might cause.**

5. **Cookies**

Some pages of our website require sending cookies (cookies). The cookie is a file installed on the hard drive of your computer and contains information improving communication between our server and your browser. Our server installs on your computer a permanent witness at the first visit and, depending on the various used applications, other temporary or permanent cookies to technically manage certain choices you make, could be used. Be assured that no Personal information is kept in the cookies.

You can reject or disable cookies. To do so, check your web browser configuration options (i.e. Internet Explorer, Google Chrome, Mozilla Firefox, etc.). If you refuse or would turn off some or all cookies, certain features of our website may no longer be available.

6. **Internet Protocol (IP) address**

The Internet Protocol address (hereinafter referred to as " **IP address** ") is associated with the Internet connection on your computer by your Internet provider. Elite may use this IP address for various reasons including diagnose problems with its web servers, manage its website and compile statistics.

7. **Navigation (browsing) information**

Your navigation information is used, among others, to measure interest in, and use made by users of certain parts of our website as well as the effectiveness of certain promotional programs administered by or on behalf of Elite. This information can not identify you nor your business; it is only statistical data on the duration of the visit, the pages visited, the order in which pages were visited, etc.

From time to time, Elite may use Google Analytics services to proceed with the collection of navigation information on our Website. To no longer be subject to analysis of Google Analytics when you browse the Internet please visit tools.google.com/dlpage/gaoptout.

For more information on their privacy policy, please visit the following webpage:
<http://www.google.com/intl/fr/policies/privacy/>.

8. Sharing Confidential information with third parties

Elite may share some of your Confidential information when necessary or helpful in order to provide you with the services available on the website. Although it can not be held responsible, Elite is committed to take reasonably necessary measures so that the Confidential information shared with thirds are retained in a manner compliant with this Policy. Thus, we may disclose your confidential information to the following persons, in the circumstances described below:

(a) Communication during your qualification process

We may disclose your Confidential information to any company with which you qualified so that it can take notice of your qualification record and evaluate your candidacy for the mandate. We will only provide those companies the Confidential information they need for this purpose and it is forbidden to use such Confidential information for any other purpose.

(b) Communication to service providers

We may disclose your Confidential information to other companies providing services on our behalf. In addition, we may disclose your Confidential information to an organization or individual whose services were retained by Elite to evaluate your creditworthiness or in order to collect outstanding debts on an account, or to our auditors . We will only provide those companies the Confidential information they need for this purpose and it is forbidden to use such Confidential information for any other purpose.

(c) Communication in relation with transfer of activities

Elite may participate in the sale or transfer of part or all of its activities. As part of that sale or transfer, Elite may disclose your Confidential information to the acquiring organization, but will require that organization to agree to protect the confidentiality of your Confidential information in a manner compliant with this Policy.

(d) Law enforcement and communication under a law

Elite may disclose your Confidential information to a government agency that has asserted its lawful authority to obtain Confidential information or when Élite has reasonable grounds to believe that some Confidential information might be useful in the investigation of unlawful activity, or to comply with a subpoena, warrant or court order, a person or body with jurisdiction requiring the submission of Confidential information, or to comply with a court decision concerning the disclosure of information records. Elite may also disclose your Confidential information to its legal adviser.

If you prefer that we not share your Confidential information in the manner described above, please inform us (see our contact information in the "**Customer Service**" below).

9. Location data

When you join the website, Elite may gather and process information about your location. Elite uses this information to optimize your experience on its website, to present you with offers, advertising and relevant information you might be interested in. To determine your position, we will take into account, in particular, location data, IP address and any other means as necessary.

10. Links to third-party websites

Please note that the website contains links to websites operated by other organizations. Elite has no control over these websites and their privacy practices, and the fact of having them listed and available to you does not bind, in any way, the responsibility of Élite. We recommend that you carefully review the privacy policy of these other websites in regards of personal information.

11. Amendment in Policy

When Élite, in its sole discretion, will make changes to this Policy, we will also revise the date of "Last Update" at the top of the privacy statement.

Although it is not our intention to frequently change or substantially modify this policy, it could happen so we can better serve you in the future or in the light of the evolution of our services, the technology or the law. We invite you to review the content regularly in order to be notified of any change to the Policy. Your use of the website following the posting of an amended version of the Policy constitutes your consent to be bound by these changes. Any changes to this Policy is effective immediately and, if appropriate, retroactively after being posted by Elite.

For any question or comment regarding this Policy, please contact our Customer service:

Customer service – Élite Management SST inc.

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