



PERSONAL INFORMATION PROTECTION POLICY AND CONFIDENTIALITY POLICY

Please note that the following policies are subject to change at any time.

1. Context

This policy aims to ensure the protection of personal information and to govern the way in which ON Animation Studio Montreal collects, uses, communicates, stores and destroys it or how it otherwise manages it. In addition, it aims to inform any interested person about how ON Animation Studio Montreal processes their personal information. It also covers the processing of personal information collected by ON Animation Studio Montreal by technological means.

2. Application and definitions

This policy applies to ON Animation Studio Montreal, which includes its managers and employees.

It targets all types of personal information managed by the studio, whether it is the information of its potential recruits, its suppliers and its employees.

For the purposes of this document, personal information is information which concerns a natural person and which allows, directly or indirectly, to identify them. *For example, this could be a person's name, address, email address, telephone number, gender or banking information, health information, ethnic origin, language, etc.*

Sensitive personal information is information for which there is a high degree of reasonable expectation of privacy, *ex. health information, banking information, biometric information, sexual orientation, ethnic origin, political opinions, religious or philosophical beliefs, etc.*

Generally speaking, an individual's professional or business contact information does not constitute personal information, for example an individual's name, title, address, email address or work telephone number. More particularly and for the sake of precision, within the meaning of the Act respecting the protection of personal information in the private sector of Quebec, and as of September 22, 2023, sections 3 (collection, use, communication), 4 (conservation and destruction) and 6 (data security) do not apply to information about a person relating to the exercise of a function in a company, such as their name, title, function, as well as address, email address and workplace telephone number.



These same paragraphs also do not apply to personal information that has a public nature under the law, as soon as this policy comes into force.

3. Collection, use and communication

The studio also informs the persons concerned, at the time of collecting personal information, of any other information collected, the purposes for which it is collected and the means of collection, in addition to other information to be provided as required by law .

The studio applies the following general principles regarding the collection, use and communication of personal information:

Consent :

- Generally, the studio collects personal information directly from the person concerned and with their consent, unless an exception is provided for by law.
- Normally, the studio must also obtain the consent of the data subject before collecting their personal information from third parties, before communicating it to third parties or for any secondary use thereof. However, the studio may act without consent in certain cases provided for by law and under the conditions provided for therein. The main situations where the studio may act without consent are set out in the relevant sections of this policy.

Collection:

- In all cases, the studio only collects information if it has a valid reason to do so. In addition, the collection will only be limited to the necessary information needed to fulfill the intended objective.
- Collection from third parties. The studio may collect personal information from third parties. Unless there is an exception provided for by law, the studio will request the consent of the person concerned before collecting personal information concerning them from a third party.

In certain situations, the studio may also collect personal information from third parties, without the consent of the person concerned, if he or she has a serious and legitimate interest in doing so and a) if the collection is in the interest of the person and that it is not possible to do so from them in a timely manner, or b) if this collection is necessary to ensure that the information is accurate.



Also, the studio may collect personal information indirectly, notably by using:

- LinkedIn. LinkedIn has its own terms and privacy policy, which can be consulted for more information.

This collection through third parties may be necessary for recruitment. When required, the studio will obtain the person's consent at the appropriate time.

Possession and use:

- ON Animation Studio Montreal ensures that the information it holds is up to date and accurate at the time of its use to make a decision relating to the person concerned.
- S ON Animation Studio Montreal may only use an individual's personal information for the reasons indicated herein or for any other reasons provided during collection. In certain cases provided by law, the studio uses the information for secondary purposes without the individual's consent, e.g. ex. :
 - when this use is clearly for the benefit of that person;
 - when necessary to prevent or detect fraud;
 - when necessary to evaluate or improve protection and security measures.
- Limited access. The studio must put in place measures to limit access to personal information only to employees and people within its organization who have the authority to read it and for whom this information is necessary in the exercise of their functions.

Communication :

- Generally, and unless an exception indicated in this policy or otherwise provided for by law, ON Animation Studio Montreal will obtain the consent of the person concerned before communicating their personal information to a third party. In addition, when consent is necessary and when it concerns sensitive personal information, the studio must obtain the explicit consent of the person before communicating the information.
- However, the communication of personal information to third parties is sometimes necessary. Thus, personal information may be communicated to third parties without the consent of the person concerned in certain cases, in particular, but not exclusively, in the following cases:
 - The Studio may communicate personal information, without the consent of the person concerned, to a public body (such as the government) which, through one of its



representatives, collects it in the exercise of its responsibilities or the implementation of a program which he manages.

- Personal information may be transmitted to its service providers to whom it is necessary to communicate the information, without the consent of the person.
- If this is necessary for the purposes of concluding a commercial transaction, Studio d'Animation ON Montréal could also communicate personal information, without the consent of the person concerned, to the other party of the transaction and subject to the conditions provided for by law.
- **Communication outside Quebec:** It is possible that personal information held by ON Animation Studio Montreal may be communicated outside Quebec, for example, when the studio uses cloud service providers whose servers are located outside Quebec or when the studio does business with subcontractors located outside the province.

Additional information on the technologies used:

ON Animation Studio Montreal also collects personal information through technological means such as web forms integrated into a website controlled by the studio as part of the recruitment process.

The Studio ensures that these settings offer the highest level of confidentiality by default (cookies are not affected).

4. Retention and destruction of personal information

Unless a minimum retention period is required by applicable law or regulation, the Studio will only retain personal information for the period necessary to achieve the purposes for which it was collected.

At the end of the retention period or when the personal information is no longer necessary, the studio will ensure:

1. to destroy them; Or
2. to anonymize them (i.e. they no longer irreversibly allow the person to be identified and it is no longer possible to establish a link between the person and the personal information) to use them for serious and legitimate purposes.

The destruction of information by ON Animation Studio Montreal must be done in a secure manner, to ensure the protection of this information.



This section may be supplemented by any policy or procedure adopted by the studio regarding the retention and destruction of personal information, if applicable. Please contact the Studio's Privacy Officer (listed in this policy) for more information.

5. Responsibilities of ON Animation Studio Montreal

Generally speaking, the studio is responsible for protecting the personal information it holds.

The studio's chief privacy officer is the CEO of the organization. He or she must, generally speaking, ensure compliance with applicable legislation regarding the protection of personal information.

Studio staff members having access to personal information or being otherwise involved in its management must ensure its protection and respect this policy.

The roles and responsibilities of Studio employees throughout the lifecycle of Personal Information may be specified by any other Studio policy in this regard, if applicable.

6. Data security

The studio undertakes to implement reasonable security measures to ensure the protection of the personal information it manages. The security measures in place correspond, among other things, to the purpose, quantity, distribution, medium and sensitivity of the information. Thus, this means that information that can be qualified as sensitive (see the definition provided in section 2) will have to be subject to greater security measures and will have to be better protected. In particular, and in accordance with what has been mentioned previously concerning limited access to personal information, ON Animation Studio Montreal must put in place the necessary measures to impose constraints on the rights of use of its information systems, so that only employees who need to have access are authorized to access it.

7. Rights of access, rectification and withdrawal of consent

To assert their rights of access, rectification or withdrawal of consent, the person concerned must submit a written request to this effect to the studio's personal information protection manager, at the email address indicated in the following section.

Subject to certain legal restrictions, data subjects may request access to their personal information held by the studio and request its correction if it is inaccurate, incomplete or ambiguous.

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The person responsible for the protection of personal information at ON Animation Studio Montreal must respond in writing to these requests within 30 days of the date of receipt of the request. Any refusal must be reasoned and accompanied by the legal provision justifying the refusal. In these cases, the response must indicate the remedies under the law and the time limit for exercising them. The manager must help the applicant understand the refusal if necessary.

Subject to applicable legal and contractual restrictions, data subjects may withdraw their consent to the communication or use of the information collected.

They can also ask the studio what personal information is collected from them, the categories of people at ON Animation Studio Montreal who have access to it and their retention period.

8. Complaint handling process

Reception

Any person who wishes to make a complaint relating to the application of this policy or, more generally, to the protection of their personal information by ON Animation Studio Montreal, must do so in writing by contacting the person responsible for the protection of personal information from the studio to the email address indicated in the following section.

The individual must indicate their name, contact details, including a telephone number, as well as the subject and reasons for their complaint, giving sufficient detail so that it can be evaluated by the studio. If the complaint made is not sufficiently precise, the person responsible for the protection of personal information may request any additional information that he considers necessary to be able to evaluate the complaint.

Treatment

ON Animation Studio Montreal undertakes to treat any complaints received confidentially.

Within 30 days following receipt of the complaint or following receipt of all additional information deemed necessary and required by the studio's personal information protection manager to be able to process it, the latter must evaluate it and formulate a reasoned response. written by email to the complainant. This assessment will aim to determine whether the studio's processing of personal information complies with this policy, any other policies and practices in place within the organization and applicable legislation or regulations.

In the event that the complaint cannot be processed within this period, the complainant must be informed of the reasons justifying the extension of the deadline, the progress of the processing of his complaint and the reasonable time necessary to be able to provide him with a final answer.



The studio must create a separate file for each complaint addressed to it. Each file contains the complaint, the analysis and documentation supporting its assessment, as well as the response sent to the person who made the complaint.

It is also possible to file a complaint with the Commission d'accès à l'information du Québec or any other supervisory body regarding the protection of personal information responsible for the application of the law concerned by the subject of the complaint.

However, the studio invites anyone interested to first contact their privacy officer and wait for the processing process to be completed by the studio.

9. Approval

This policy is approved by the studio's Privacy Officer, whose business contact details are as follows:

Responsible for the protection of personal information:

Olivier Rakoto

1257 rue Guy, suite 200

Montreal (Quebec), H3H 2K5

orakoto@onanimationstudios.com

For any requests, questions or comments regarding this policy, please contact the person in charge by email.

Other

We may change the content of our websites and the way we use cookies without notice and, therefore, our Privacy Policy and our Cookie Policy may be modified from time to time in the future. We therefore encourage you to review them each time you visit the Website in order to remain informed of how we treat personal information.

This policy was last updated in September 2023.