

## Privacy and the Protection of Personal Information Policy

Last Updated: February 8, 2024

Ore Pros Inc. is committed to respecting your privacy and protecting your personal information. As a staffing agency, we consider it vitally important to protect the personal information you entrust to us, and we will do everything in our power to maintain your trust.

When you contact Ore Pros Inc. as an applicant or as a potential candidate at the pre-employment stage, we collect personal information about you, such as your name and email address. This personal information may be submitted directly to Ore Pros Inc. through the online application process or by email to submit your application for review.

In this policy, we explain how we collect, use and protect your personal information. This policy applies to any personal information about you that we collect when you interact with us. This policy has been written to adhere to privacy laws, particularly within the jurisdiction of Quebec. The laws include the [Act respecting Access to documents held by public bodies and the Protection of personal information](#) (Access Act) and the [Act respecting the protection of personal information in the private sector](#) (Private Sector Act).

Please see the “How to contact us” section to follow up if you have any questions, comments or requests regarding this policy or your personal information.

### **Our commitment**

We have established and adopted internal policies and procedures aimed at adequately protecting the personal information within our possession, and we review them on a regular basis.

We make our employees aware of the importance of protecting personal information by first giving them an overview of the topic, and then periodically sending out communications reminding them of their roles and obligations.

We take all reasonable steps to ensure that our consultants, directors, employees, customers and other third parties comply with the requirements of applicable privacy and access to personal information legislation.

We have assigned the task of ensuring the protection of our employees' and clients' personal information to an employee group, and we have appointed a privacy officer to deal with privacy issues and access to personal information on file.

## **What is considered personal information?**

Personal information is any information that identifies you or can be used to identify you. This information could include your name, date of birth or contact information.

## **What personal information do we collect?**

As part of the hiring process, we may ask you to provide us with certain personal information required for the position. This information will be used to create your candidate file, facilitate the interview process, verify the information on your résumé, etc.

With your consent, the information collected may also be used to contact you at a later time to offer you new job opportunities that may match your experience. The personal information in your file will be kept for a maximum of two (2) years from your last contact about employment opportunities, either as an applicant or as a candidate at the pre-employment stage.

The following is a non-exhaustive list of personal data we may collect and use:

- Full name
- Email
- Address
- Photos and videos (for virtual interviews)
- Professional and educational experience

If you receive an offer from Ore Pros Inc. a background check may be performed, as well as data collection on criminal offences and other legal proceedings depending on the aptitudes or qualifications required for a particular position. Certain positions, especially those with a high level of responsibility, subject to particular regulations or professional requirements, and positions requiring particular physical skills may require the collection of more specific personal information.

Ore Pros Inc. may collect personal information about you from third parties, for example:

- Your references
- Your previous employers
- Background check firms

Ore Pros Inc. may also collect personal information about you that is publicly available online. In exceptional circumstances, Ore Pros Inc. may collect personal information deemed sensitive relating to health and medical characteristics, such as infection status, test results and vaccination status, to meet public health and

occupational safety obligations, as well for the protection of Ore Pros Inc. and its employees, clients and third parties.

As part of the hiring process, we may send or give access to personal information in your file to clients located in or outside of Quebec, to companies connected to Ore Pros Inc. or to government agencies. Some personal information in your file may be kept for a maximum of three (3) years following the end of your employment with Ore Pros Inc.

Certain third parties may require your personal data to:

- host our candidate database
- select a pool of potential candidates to fill a temporary assignment with a client company

At the hiring stage, Ore Pros Inc. may also collect personal information, such as:

- valid identification (driver's license, passport, health insurance card, etc.)
- Date of birth (with year)
- Social insurance number (SIN)
- Criminal record
- Medical information
- Financial information

## **How do we use your personal information?**

We use your personal information primarily to:

- communicate with you;
- assess your application for the positions we post;
- compile and maintain records for recruitment and hiring;
- ensure compliance with legal requirements, including public health and workplace safety;
- conduct background checks; and
- maintain a database records on infection status, test results and vaccination status to the extent permitted or required by applicable law.

We only collect personal information that is necessary to fulfill our business requirements. We only use the data for its original intended use, which we specify at the time of collection.

## **What is the legal basis for using your personal data?**

The legal basis for using your personal information is based, in part, on the following:

- to conduct our primary business, which is to assess your application to ensure that we recruit suitable employees, and to evaluate and improve the effectiveness of our recruitment process generally;

- to perform contractual and pre-contractual obligations to establish our potential employment relationship with you;
- to comply with applicable laws, including those regarding public health and safety in the workplace; and
- for other specified purposes with your express consent.

## **How long do we keep your personal information?**

We will only keep your information for as long as it is reasonably required for the purposes for which it was collected or used, or to comply with various legislative requirements.

If you accept an offer of employment with Ore Pros Inc., any relevant personal information collected during your pre-employment period will become part of your personnel file, which will be maintained for as long as you are employed by Ore Pros and for a reasonable period afterwards.

If you are not hired by Ore Pros Inc. we might continue to retain and use your personal information for a limited period to consider you for future employment opportunities. We will only retain a minimal amount of personal information to maintain your recruitment file.

The personal information that we have collected to fulfill legal obligations to public health or workplace safety will be retained for as long as the law requires, and some time afterwards to ensure that we have complied with all potential legal obligations.

We will regularly review the information we hold and securely delete it when it is no longer necessary to retain it for legal, human resources or public health reasons.

## **How do we ensure that your personal information is kept safe?**

We have implemented a combination of physical, organizational and technological protocols to ensure the confidentiality of the personal information we hold, to protect it against loss or theft, and to prevent unauthorized access, disclosure, reproduction, use or modification.

We use the standard SSL (Secure Sockets Layer) encryption for the transmission of personal information on our websites. You can check that this protection is in place by looking for the padlock symbol on most web browsers. SSL enables a secure connection between your web browser and our Internet server, using a private key to encrypt information.

Your personal information will be viewed by Ore Pros Inc. recruiters and interviewers. When we disclose personal information to a third party, we take the necessary security measures to ensure that the commitments and rules outlined in this policy are respected by them. We also require all third-party suppliers who process your personal information to comply with the requirements of privacy laws. We only provide the personal information that is relevant to the services they provide.

## **What security measures do you take to protect personal information?**

As part of our ongoing commitment to earn your trust, we apply generally accepted industry security standards to protect your personal information for as long as it remains in our possession. When deciding what measures to apply, we ensure that they are reasonable, considering factors such as the sensitivity of the personal information in question and the context of its use.

The security measures we take fall into three broad categories:

1. Technological security measures, e.g., firewalls, information access privilege management, encryption, etc.
2. Physical security measures, e.g., locked filing cabinets, restricted access to premises, etc.
3. Organizational security measures, e.g., policies, procedures, information security training and awareness, reliability and integrity checks, identification and authentication procedures when you communicate with us or use our secure electronic services such as the online job application. We have also established procedures for detecting and managing security incidents that could affect your personal information.

Ore Pros Inc. team members are required to report any suspected or confirmed security incidents.

## **How do we use cookies and other technologies?**

There are "strictly necessary cookies" that are essential to allow users to navigate the Ore Pros Inc. website and use its features.

When you access the Ore Pros Inc. website, you will be informed of our Cookie Management Policy by a banner that provides you with information about the purpose of the cookies, as well as the means of opting out.

## **Right to personal information**

You have the right to access and update your personal information. You also have the right to withdraw your consent to the storage and use of your personal information. There is no charge or other barrier for you to access or change your information, or to withdraw your consent.

## **Maintaining accurate and up-to-date personal information**

We strive to keep the personal data we hold accurate, complete and updated. However, we must rely on you to inform us promptly of any changes to your personal information.

You may request that corrections be made to your personal information at any time. Where appropriate, we will forward the amended information to third parties who have access to your personal information.

## **Withdrawal of consent to the use of your personal information**

We only collect, maintain and use your information with your consent, and you may withdraw that consent at any time.

Whenever we ask you for your consent, we will also tell you how you can withdraw it if you change your mind and explain the implications of doing so.

## **How to contact us**

If you have any questions, comments or requests regarding this policy, your rights or your personal information, please contact the Ore Pros Inc. Privacy Officer:

### **Tina Kalviainen**

People Operations Associate

Email: [priv@orepros.ca](mailto:priv@orepros.ca)

Address:

Ore Pros Inc.

888 3rd Avenue, Suite 201

Val-d'Or, Quebec J9P 5E6

Tel: (819) 824-2010

We will process your request within thirty (30) days of receipt, or we will notify you if we are unable to respond within that time.

## **What should I do if I believe my personal information has been compromised?**

If you have reason to believe that your personal information has been compromised, please contact the Privacy Officer.

In the event of a privacy incident, such as a leak of your sensitive personal data, we will keep you informed in a timely manner.

## **Updates to this policy**

This policy will be updated regularly. This version was based on company policy updates from February 8, 2024. Any new version will automatically come into effect as soon as it is published by Ore Pros Inc. We invite you to consult the Ore Pros Inc. website regularly for any changes.