

# PRIVACY NOTICE (Proaction Website)

This notice describes how Proaction International inc., Proaction Monde inc., Proaction Consulting Group inc., and the other entities affiliated to Proaction International inc. ("we", "us", "**Proaction**") collect, process, use and share personal information and Personal Data about visitors on websites operated by Proaction (collectively the "**Websites**").

This notice applies only to the Websites and not to Proaction's other activities.

In this notice, the term Personal Data refers to information about an identifiable individual.

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## 1. Data Controller

The contact details of the data controller for Proaction's activities covered by this notice are as follows:

### Privacy Officer

#### Proaction Groupe Conseil Inc.

100-257 Sherbrooke Street East  
Montréal Québec H2X1E3 Canada  
[privacy@proactioninternational.com](mailto:privacy@proactioninternational.com)

The contact details of the data controller's representative in the European Economic Area are as follows:

### Privacy Officer

#### Proaction Europe SAS

30 Grande rue  
90300 VETRIGNE, France  
[privacy@proactioninternational.com](mailto:privacy@proactioninternational.com)

## 2. Basis for Processing Personal Data

In order to enable you to use the Websites and the services offered through the Websites, we need to collect and process Personal Data about you. The processing is mainly based on the following:

- We need to process certain data to provide you services and to enable you to use the Websites.
- We process certain Personal Data to provide you services you request, for example when you subscribe to our newsletter.

- We process Personal Data for the purposes of our legitimate interests to improve the quality of the Websites, to learn about the browsing habits of our visitors and to organize targeted advertising campaigns based on the traffic on the Websites.

### 3. Personal Data Collected

We collect and maintain all data described below in accordance with this notice.

#### 3.1. Data Collected from the User

We collect information that users voluntarily submit to us, through the Websites' interface (for example, by filling out a form) or otherwise. This information may include:

Categories of Personal Data	Purpose of Use
<ul style="list-style-type: none"> <li>▪ Last name, first name</li> <li>▪ Title or function</li> <li>▪ Email address</li> <li>▪ Phone number</li> </ul>	This data allows us to identify you and communicate with you about your use of the Websites.
The content of the communications you send to us	Respond to your requests.

#### 3.2. Automatically Collected Data

We collect certain information automatically when you use the Websites. This information may be recorded each time you interact with the Website. The data collected includes certain information specific to your computer and data about your interaction with the Websites, including the following data:

Categories of Personal Data	Purpose of Use (See Section 4 for details)
<ul style="list-style-type: none"> <li>▪ The IP address of your computer</li> <li>▪ The configuration of your browser and operating system</li> <li>▪ The configuration of your mobile device, when you access the Websites from a mobile device</li> <li>▪ The pages visited, the products viewed, the path taken on the website</li> <li>▪ Mobile device identification number</li> </ul>	<p><b>Customization.</b> This data is collected automatically and is used to personalize your experience on the Websites, for example, by providing you with an interface in the language of your system, or by placing your most frequently used sections prominently.</p> <p><b>Analysis.</b> We use this data on an aggregated basis, which does not identify individuals, to perform analyses on the use of the Websites, to determine how users use the features of the Websites and to improve those features.</p> <p><b>Retargeting.</b> We traffic data, such as the pages you visit, combined with your email address or data generated by browser cookies to build targeted audiences.</p>
Geographic location and location data	<p>We collect location data only if you have authorized the Websites to access the location data of your mobile device.</p> <p>We use general location data obtained from your IP address to personalize your experience on the Websites.</p> <p>General user location data is analyzed in an aggregated form that does not allow monitoring of any particular user.</p>

### 3.3. Data from Analysis Tools

When you access the Websites, we collect certain general data from analysis tools such as Google Analytics. This data may include, for example, gender, age group, interests. This data is not associated with you personally and is sent to us in aggregate form. You can deactivate Google Analytics on your browser by means of an add-on available at this address: <https://tools.google.com/dlpage/gaoptout>.

### 3.4. Data from Social Networks

We collect information from social networking sites or applications (Facebook, LinkedIn, Twitter, YouTube, Google+, etc.) when you interact with profiles that we operate on these social networking sites or applications. These sites or applications are also governed by their own policies relating to your Personal Data, which may differ from ours and may be applicable.

### 3.5. Information Related to Cookies

We use browser cookies and other similar technologies to improve the performance of the Websites and your experience. Cookies are small files that are stored on your hard drive by the server that hosts the Websites or by third party servers (advertising servers, servers operated by companies that provide services to us) that enable us to recognize your device when you visit the Websites, to personalize the content of the Websites and to compile Websites traffic data. Some cookies are automatically deleted when you shut down your browser (session cookies), while others are stored indefinitely (permanent cookies). If you do not want cookies (or certain cookies) to be stored on your device, you can customize or disable the storage of cookies from your browser. Certain features of the Websites may be disabled or modified if the storage of cookies (or certain cookies) is disabled. Some cookies are only stored with your explicit consent.

## 4. **Use of Personal Data**

We use Personal Data that is collected through the Websites for the purposes described below.

### 4.1. Communication with you

We use Personal Data you have provided us with (e.g. your name and e-mail address) to communicate with you about your use of the Websites, about our products and services, to send you promotional offers or to solicit your feedback, but only if you have provided us with your contact information and you gave express or implied consent to receive communications from us. We comply with applicable regulations regarding unsolicited electronic communications. If you no longer wish to receive electronic communications from us, you may notify us at any time at [privacy@proactioninternational.com](mailto:privacy@proactioninternational.com).

### 4.2. Customization of our Services and Websites

We use the data collected during your connection to the Websites to provide you with content that matches your situation or your interests. For example, the home page of the Websites may be displayed according to your language preferences and the products displayed may be different depending on your geographic location.

### 4.3. Website Maintenance and Security

We use the data collected through the Websites and from analysis tools to monitor users' use of the Websites in general, to prevent misuse of the Websites, to identify problems or bugs with the Websites and to determine which features need to be improved. We may use certain data collected automatically to ensure the security of the Websites and our computer systems, for example, to prevent inappropriate use.

### 4.4. Personalized Marketing and Retargeting

We use the data collected to customize our advertising campaigns based on certain data, such as your subscription to our newsletter, your interest in our products and services, and navigational data, such as the pages you viewed or the products you visualized on the Websites.

This data allows us to target audiences to partners offering advertising services, to profile visitors in order to maximize our marketing efforts (e.g., by only contacting more engaged visitors via email) and to personalize our marketing content.

#### 4.5. Legitimate Interests

We process Personal Data that is collected through the Websites to serve our legitimate interests, including to improve the Websites, to prevent fraud by analyzing users' behavior and to improve our marketing processes.

We take the privacy of our users seriously, which is why the processing of Personal Data based on legitimate interests never involves the targeted monitoring or surveillance of an identifiable individual.

### 5. Storage of Personal Data

We keep collected Personal Data until you request us to delete it or until our activities no longer require us to retain it. However, we make no commitment to keep Personal Data for a specific period of time.

Personal Data collected through the Websites is stored electronically on servers operated by our hosting providers located in Canada in the provinces of Quebec and Ontario.

Personal Data about individuals outside of Canada is transferred to Canada. Canada is recognized as an adequate jurisdiction for the transfer of Personal Data from the European Union. Certain data that is disclosed to our suppliers in accordance with this notice is transferred to other jurisdictions. We ensure that the transfer of such Personal Data is made with appropriate safeguards with regard to the nature of the Personal Data being transferred.

### 6. Security

#### 6.1. Security Measures

The security of the Personal Data collected is ensured by our data hosting service provider (Microsoft Azure). We retain only hosting service providers that offer reasonable measures to protect the security and integrity of data. Our data hosting service provider policies regarding information security are available at the following address <https://azure.microsoft.com/fr-fr/support/trust-center/>.

Our employees and suppliers are informed of the confidential nature of the Personal Data collected through the Websites and are made aware of the appropriate security measures to prevent unauthorized access to Personal Data.

#### 6.2. Security Breach

In the unlikely event of unauthorized access, use, disclosure or modification of Personal Data (a "**Security Breach**"), Proaction will use commercially reasonable efforts, as soon as reasonably possible, to:

- a) stop any unauthorized access to Personal Data;
- b) identify, with its hosting service provider, the cause of the Security Breach;
- c) take all reasonable corrective action to prevent another Security Breach; and
- d) to the extent that a Security Breach involves Personal Data, notify the responsible authorities if such notification is required by applicable law or regulation.

### 7. Disclosure of Personal Data

We only share your Personal Information in the manner described in this notice or when we have your consent. Your Personal Data may be disclosed to the categories of persons or entities described below for the purposes mentioned.

7.1. Proaction Group

Personal Data collected through the Websites is accessible by Proaction affiliated entities, doing business under the names Proaction Groupe Conseil, Proaction International, Proaction Monde, Proaction Europe, Proaction USA and UTrakk\_DMeS.

7.2. Employees

Personal Data collected through the Websites is only accessible to our officers and employees who need to access it to make the use described in this notice.

7.3. Service Providers

We may share Personal Data with service providers that allow us to provide our services more efficiently. These service providers agree in writing to maintain confidentiality of your Personal Data and not to use it for any purpose other than to provide services to us or in accordance with their own privacy or data protection policies. Our service providers include the companies described below:

Supplier	Details	Useful links
Microsoft	<p>We use the Microsoft Azure service to host our data.</p> <p>Microsoft agrees to use the data we provide only for the purpose of providing services to us.</p>	<p>Microsoft Online Services Data Protection Addendum:  <a href="https://www.microsoftvolumelicensing.com/Downloader.aspx?DocumentId=17880">https://www.microsoftvolumelicensing.com/Downloader.aspx?DocumentId=17880</a></p>
Facebook Inc.	<p>We use one or more "Facebook pixel(s)" on the Websites.</p> <p>The Facebook pixel allows Facebook to collect information about certain events on the Websites such as the pages you visit or the products you view.</p> <p>Sharing data with Facebook allows us to personalize advertising campaigns on Facebook.</p> <p>Data shared with Facebook is used by Facebook in accordance with its Data Use Policy.</p>	<p>Facebook Data Policy:  <a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a></p> <p>Learn more about the Facebook pixel:  <a href="https://www.facebook.com/business/learn/facebook-ads-pixel">https://www.facebook.com/business/learn/facebook-ads-pixel</a></p>
Google, LLC	<p>We use Google Analytics services on the Websites; We use Google Ads and Optimize and Search Console services in order to personalize our advertising campaigns.</p> <p>Google Analytics provides information about the behavior of visitors to the Websites, including through the use of "cookies" which allow Google to collect information about certain events on the</p>	<p>Google Privacy Policy:  <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a></p> <p>Google's use of data from third party sites:  <a href="http://www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a></p> <p>Information on Google Analytics:</p>

	<p>Websites such as the pages you visit, the length of a session or the products you view.</p> <p>The data transmitted to Google allows advertising campaigns on the Google advertising network to be customized based on these behaviors.</p>	<a href="https://support.google.com/analytics/?hl=en&amp;ref_topic=2919631#topic=9143232">https://support.google.com/analytics/?hl=en&amp;ref_topic=2919631#topic=9143232</a>
Hubspot	<p>We use Hubspot's services to centralize our marketing activities.</p> <p>Hubspot receives Personal Data in order to provide services to us and undertakes to use such data only for the purpose of providing services to us.</p>	<p>Privacy Policy for the use of HubSpot : <a href="https://legal.hubspot.com/fr/product-privacy-policy">https://legal.hubspot.com/fr/product-privacy-policy</a></p> <p>HubSpot Data Processing Agreement : <a href="https://legal.hubspot.com/fr/dpa">https://legal.hubspot.com/fr/dpa</a></p>
Globalia	<p>We use the services of an agency to assist us in our marketing activities.</p> <p>Globalia and its employees with access to our data undertake in writing to keep it confidential and not to use it for other purposes.</p>	
LinkedIn	<p>We use one or more "LinkedIn pixel(s)" on the Websites.</p> <p>The pixel allows LinkedIn to collect information about certain events on the Websites such as the pages you visit or the products you view.</p> <p>Sharing data with LinkedIn allows us to personalize advertising campaigns on LinkedIn.</p> <p>Data shared with LinkedIn is used by LinkedIn in accordance with its Privacy Policy.</p>	<p>Privacy Policy : <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a></p> <p>Information on the processing of Personal Data by LinkedIn : <a href="https://privacy.linkedin.com/">https://privacy.linkedin.com/</a></p>
Jobvite	<p>We use Jobvite's services to help us manage the applications received through the Websites.</p> <p>Jobvite agrees to maintain the confidentiality of Personal Data and use the same only to provide us with services.</p>	<p>Jobvite Privacy Policy : <a href="https://www.jobvite.com/privacy-policy/">https://www.jobvite.com/privacy-policy/</a></p>

#### 7.4. Legal Obligations

We may also disclose Personal Data collected through the Websites to third parties if expressly permitted or required by law, or if we are compelled to do so by a competent authority. We may disclose Personal Data in connection with legal proceedings, if necessary to protect our rights or those of our users.

#### 7.5. Transfer of Business

In the event that the sale or restructuring of all or part of Proaction is contemplated, we may disclose Personal Data collected through the Websites to the persons or organizations involved before and after the transaction, whether or not the transaction actually takes place. In such a case, these persons or organizations will undertake to preserve the confidentiality of disclosed Personal Data and to use the same exclusively in order to evaluate the feasibility of the transaction or in accordance with this notice.

### 8. Your Rights

#### 8.1. Access and Correction

You may request to access the Personal Data collected about you or to change inaccurate Personal Data at [privacy@proactioninternational.com](mailto:privacy@proactioninternational.com) or at our mailing address set out at the beginning of this notice.

We will respond to your request promptly (no later than 30 days after receipt) by providing you with access to your Personal Data in our system where required. Where required by law, we will provide your data in a machine-readable format.

#### 8.2. Withdrawal of Consent

You may withdraw your consent to the collection of some Personal Data.

If you wish to withdraw your consent to the processing of your Personal Information beyond what is permitted by your browser configuration, please notify us by emailing us at [privacy@proactioninternational.com](mailto:privacy@proactioninternational.com). It is not possible to prevent the processing of your Personal Data and your continued use of the Websites. The only way to stop the processing of your Personal Data is to stop using the Websites.

Some data about your use of the Websites (and websites in general) is collected directly by other companies (for example Google or Facebook) without our intervention. You must contact these companies directly to withdraw your consent to such collection.

#### 8.3. Opposition

In certain circumstances, you have the right to object to the processing of your Personal Data that we carry out for the purpose of our legitimate interests. Your rights in this respect depend, among other things, on your place of residence. To object to the processing of your Personal Data, you can write to us at [privacy@proactioninternational.com](mailto:privacy@proactioninternational.com).

#### 8.4. Deletion

You may request the deletion of your Personal Data collected through the Websites. To make such a request, please write to us at [privacy@proactioninternational.com](mailto:privacy@proactioninternational.com). We will respond to your request as soon as possible (no later than 30 days after we receive it).

If you continue to use the Websites, we will again collect Personal Data about you.

#### 8.5. Complaints

If you reside in the European Union, you have the right to file a complaint regarding the processing of your Personal Data with a supervisory authority responsible for the protection of privacy. This authority varies depending on your country of residence.

If you reside outside the European Union, our processing of Personal Data is governed by the laws and regulations applicable in Canada and the Canadian authorities are exclusively competent to receive any complaint or claim based on this notice or on the processing of your Personal Data by Proaction.

8.6. Identity Verification

We reserve the right to verify the identity of persons wishing to access their Personal Data. Any information collected to carry out this verification will not be used for any other purpose.

**9. Modification**

We may amend this notice from time to time to reflect changes in our Personal Data processing practices. If a change is made, the new notice will be available at the following address [www.proactioninternational.com](http://www.proactioninternational.com).

If you have provided us with your email address, we will notify you of any material changes to our Personal Data processing practices by email within a reasonable period of time before a revised notice becomes effective.

**10. Additional Information**

For any additional information regarding our processing of Personal Data in connection with the activities covered by this notice, you may contact us at the contact information indicated at the top of this notice.