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Englobe Corp. and its subsidiaries (“**Englobe**”) are committed to maintaining the privacy and security of personal information it is entrusted with and complying with all applicable data protection legislation. This Privacy Policy provides information about the types of personal information Englobe may collect and how it is processed and protected.

Collection and Usage of your Personal Information

The types of personal information that is collected and used by Englobe could slightly differ on whether you are an Englobe employee, a potential or existing client or business partner, or an applicant to a position within the organization. If personal information is provided to Englobe by you or by you on another’s individual’s behalf, please refer them to this Privacy Policy.

Englobe Employee:

Englobe collects and processes personal information of all employees when they are hired or during their employment term in order to complete their employee file. Employees will either sign consent forms upon hire and/or employees would consent to a notice requesting disclosure of their personal information.

Potential Candidates:

Englobe collects and processes potential candidates’ personal Information when they apply for a job at Englobe, including applications made on its website. In accordance with applicable laws, Englobe may keep the information a potential candidate submits in connection with an application for employment and for future consideration.

Englobe may collect and retain a potential candidate’s name, contact details (including their personal address, e-mail, and phone number), background and experience, references or results of employment or criminal checks as well as resume/curriculum vitae and cover letter.

Collection of personal Information may be acquired directly from the potential candidate when provided in their resume/curriculum vitae and cover letter, on Englobe Careers webpages (information entered by the potential candidate), from references provided, from references received from third parties such as education institutions or current or past employers or from employment checks.



Potential or existing Clients or Business Partners:

Englobe may collect and process a potential or existing client or business partner's personal information when they have interacted with Englobe's website. In accordance with applicable law, Englobe may keep the information provided by the potential or existing client or business partner when submitted in connection with a current or future business relationship.

Englobe may collect and process a potential or existing client or business partner's name, title, company, contact details (such as telephone number and e-mail address), and information gathered from public sources such as internet searches.

Collection of personal information may be acquired from requests or inquiries to Englobe submitted via e-mail, social media sites or its websites. Personal information may also be collected at a business event or conference, in person, from the provisions of services for or otherwise contracting with Englobe. Personal information may also be collected in a less formal manner, such as through the development of business partnerships, through visits at any Englobe office, facility or accessing Englobe's systems, by telephone, and from public sources, such as internet searches, company website and social media sites.

How is the Notice of the Collection of Personal Information Given?

In accordance with applicable laws, collection, use and disclosure of personal information requires consent which must be manifest, free, and enlightened, and must be given for specific purposes. Such consent is valid only for the length of time needed to achieve the purposes for which it was requested.

The notice must inform the individual of whom the information relates:

- the purposes for which the information is collected,
- the means by which the information is collected,
- the rights of access and rectification provided by law,
- the right to withdraw consent for the disclosure or use of information collected.

Englobe will provide such notices to employees through email, consent form and/or external platform. All other individuals whose information is collected from accessing our website or through an application online will be prompted by an acceptance banner generated by Englobe's third party service provider.



How can Personal Information be Used?

Englobe Employees:

Englobe may use its employees' personal information for various legitimate reasons related to their specific job requirements, human resources management, health and safety, legal compliance, and operational efficiency.

Potential candidates:

Englobe may use the personal information it is provided with for legitimate business purposes, including to enter an employment relationship with potential candidates, legitimate business needs to assess job applications or as otherwise permitted by applicable laws. Englobe may use personal information of a potential candidate to consider their application and assess their suitability for the position applied for or for other suitable positions that might match their profile, to check/obtain information or references about them from third parties, to inform them of job opportunities, forums, publications that might be of interest to them as requested, and to review and assess Englobe's hiring policies, practices and statistics.

Business:

Englobe may use the personal information it is provided with for legitimate business purposes, including to perform obligations under its contract or to engage with clients and business partners, to deliver its professional services, or as otherwise permitted by applicable laws.

Englobe will take reasonable steps to ensure that personal information is not used unless it has obtained necessary consent, that it is used for the reason(s) for which it was collected, and that it is accurate and up to date. Englobe handles personal information responsibly and in compliance with applicable data protection laws.



Under What Circumstances Can Englobe Disclose Personal Information?

Englobe will not sell, rent or trade an individual's personal information to any third party. The following are some of the circumstances in which Englobe may be permitted to disclose personal information:

- where the individual has consented to the disclosure;
- for the purpose for which the personal information was obtained or compiled or for a consistent purpose;
- where the disclosure is necessary and proper in the discharge of Englobe's functions;
- to other Englobe entities and affiliates;
- in compelling circumstances affecting the health or safety of an individual;
- to third parties
 - in the context of a merger, acquisition, or sale of assets. In such cases, necessary notifications, as required by law or otherwise, will be made;
 - when it is reasonably believed that disclosure is necessary to protect people's safety, security, rights or property, or as otherwise permitted by applicable laws;
 - contracted as service providers
 - who process data on Englobe's behalf or who facilitate or are outsourced one or more aspects of the operation of the websites or the business such as our website providers and IT providers and those used as part of the job application process;
 - who are retained on Englobe's behalf such as legal advisors in connection with actual or threatened litigation, financial advisors or auditors; or
 - who are contracted by Englobe to verify a candidate or employee's information and to obtain references;
 - where Englobe is required by law, such as to comply with a subpoena, or similar legal process in any country where Englobe operates or to conduct any similar sharing permitted by applicable laws; or
- for the purpose of complying with applicable data protection laws and as required by the Privacy Officer or equivalent.



How Long is Personal Information Kept?

Personal information will only be kept for as long as necessary to fulfill the purpose for which it is collected, which includes complying with our legal obligations, resolve disputes, and enforce agreements.

When personal information is no longer needed to fulfil those identified purposes, measures are implemented to destroy, erase and/ or anonymize it, depending on the nature of the information.

Individuals may consult Englobe's internal retention and destruction policies, schedule, and guidelines for further information on the retention and destruction of personal information.

International Transfer of Personal Information

Englobe may transfer personal information, for processing purposes as outlined in this Privacy Policy, to any other Englobe entity or affiliate or to third parties who process data on Englobe's behalf. Englobe and relevant data processors may operate globally across Europe, and North America and may also set up establishments in other regions. We therefore reserve the right to transfer and process personal information on a global and worldwide basis in line with our legal, regulatory and contractual obligations.

Englobe will only transfer personal information where necessary to operate, meet its contractual obligations and comply with its legal and regulatory obligations. Englobe will endeavor to ensure that such transfers of personal information comply with all applicable data privacy laws and regulations and provide appropriate protection for the rights and freedoms conferred on all individuals under such laws. There may, however, be instances where for legal or contractual reasons, we are not permitted to transfer personal information outside of certain jurisdictions. Where required, further information concerning overseas transfers of personal information can be obtained by contacting Englobe's Privacy Office:

Privacy@englobecorp.com.



We may promote or provide hyperlinks of third-party websites. These third-party websites are not affiliated with Englobe and therefore do not belong to Englobe. Please note that this Privacy Policy applies only to the content of Englobe’s website and not to those websites to which we may provide a link thereof.

Protection and Rights of an Individual’s Personal Information

Protection of Personal Information

Englobe employs reasonable and customary security measures and technologies to keep an individual’s personal information secure and protected against loss, misuse, and unauthorized access, disclosure, alteration and destruction. Where third-party service providers process personal information on Englobe’s behalf (e.g., payroll or outsourcing companies), specific security arrangements are implemented, when required, through contractual arrangements with those third-party service providers. Englobe also monitors all its service providers to ensure strict compliance with applicable law.

Englobe may use an individual’s contact details, such as their e-mail address, to contact them about a security incident involving their personal information.

E-mail monitoring or blocking software may be used for security purposes and for compliance with Englobe policies.

Individuals’ Rights

In accordance with applicable law, an individual has the following rights, subject to some conditions and exceptions:

- to object to the processing of personal information for direct marketing purposes,
- to access a copy of their personal information and details about how Englobe uses it,
- to have their personal information corrected or updated,



- to request deletion of their personal information. Please note, if Englobe receives such a request, other factors will need to be taken into account when assessing whether to comply, and
- to request restriction of processing of their personal information, for example where an individual believes that the personal information Englobe has about them is inaccurate.

Where an individual is engaging with an Englobe entity in Europe, European data protection laws, including the *European Union General Data Protection Regulation* ("GDPR") as of May 25th, 2018 and other national data protection legislation in Europe, grant them the following additional rights:

- the right to lodge a complaint regarding Englobe's compliance with data protection laws with the appropriate member state data protection regulator, and
- the right to withdraw consent where Englobe relies on consent to process their personal information.

To exercise any of the above captioned rights, an individual may submit a formal request by accessing Englobe website's [Privacy Policy page](#) or send an e-mail to Englobe's Privacy Office whose contact details are below.

Englobe will take reasonable steps to functionally correct or delete an individual's personal information from Englobe database(s) upon formal request, although Englobe may keep a copy for archival purposes in compliance with applicable laws. Before Englobe provides an individual with any data, corrects any inaccuracies or deletes any data, Englobe may request additional information to verify the individual's identity or otherwise help respond to their request.

For any additional questions, complaints or concerns about privacy or the security of personal information, please contact Englobe's Privacy Officer:

Karine Desforges
Senior Vice President, Legal Affairs, Corporate Secretary, Privacy Officer and Ethics
Officer
Privacy@englobecorp.com



Changes to this Privacy Policy

Englobe may need to modify this Privacy Policy from time to time to reflect any changes in data protection and privacy laws and to update individuals on Englobe's privacy practices.

Effective Date	Title	Version
September 2023	Englobe's Privacy Policy	1