



PRIVACY POLICY

Last updated: October 3rd, 2023

At Flash Romeo Inc. ("**Flash Romeo**", "**we**"), we respect your privacy and are committed to maintaining your trust, which is why we have implemented a comprehensive privacy program and appointed a Privacy Officer to answer your questions, comments and complaints regarding your privacy.

This privacy policy (the "**Policy**") describes our privacy practices regarding the collection, use, storage, sharing and protection of your Personal Information by Flash Romeo on our website (the "**Site**"), the EVOLIA application (the "**Application**") or any other platform that we develop (collectively the "**Platform**").

Personal information

For the purposes of this Policy, "**Personal Information**" means any information about an identifiable person, including any information that directly or indirectly identifies that person.

Personal Information Management Program

In order to protect your Personal Information, we have put in place policies, practices and procedures relating to the management of the Personal Information that we hold.

These internal policies and procedures govern the collection, use, disclosure, retention and destruction of personal information, as well as the handling of complaints, information security and data governance at Flash Romeo. They also provide the framework for the implementation of privacy impact assessments, when required, as well as the prevention and response to potential privacy incidents. All such policies and practices have been approved by our Privacy Officer.

The collection of your Personal Information through our Site, our Application and our Platform complies with the requirements of this program.

Personal Information Protection Officer

Our executives have delegated the management of the privacy program to the Chief Privacy Officer. His duties are to manage and monitor Flash Romeo's personal information management program internally.

It is the Privacy Officer who approves and implements privacy policies and procedures, ensures that they are working properly, and reports to Flash Romeo's senior management on the effectiveness from the program.

It is also up to the Personal Information Protection Officer to provide you with the necessary support in the event of a question, complaint or request relating to the protection of personal information:



Chief Information Security Officer and Privacy Officer

François Couderc
Flash Romeo Inc.
5600 Boul. des Galeries, office 535
Quebec
(Quebec) G2K 2B4
privacy@evolia.com

We are committed to responding promptly to your requests. Upon receipt of a complaint, the Privacy Officer will conduct an investigation. If the complaint is justified, the situation will be corrected. Regardless of our conclusion, we will keep you informed.

Fundamentals for Processing Personal Information

Flash Romeo needs to collect and process some of your Personal Information in order for you to use our Site, Application and Platform.

When we collect your Personal Information, we make sure to only collect the information necessary to achieve one of our objectives, which will have been previously disclosed to you, for example in this Policy. We use Personal Information in accordance with the privacy laws that apply to our business.

The following is a description of the basis for the collection and processing of your personal information by Flash Romeo:

Your consent

As required by the applicable privacy laws, Flash Romeo collects the majority of your Personal Information based on your voluntary consent, favoring the collection directly from you.

For example, Flash Romeo undertakes to obtain your explicit consent for the collection of any Sensitive Personal Information, including when it comes to your employment. For the sake of clarity and when applicable, when sending an invitation on behalf of your employer to activate your account, Flash Romeo undertakes to obtain, through an account creation web page, your express consent for the collection of any Sensitive Personal Information related to your employment.

Other permitted legal usage, such as the realisation of our contracts

As permitted by applicable privacy laws, Flash Romeo may collect Personal Information without your express consent, for example to comply with applicable law obligations or to perform our contracts.

Personal information collected

Depending on the nature of your activity on the Site, Application or Platform, we may collect your Personal Information, including:

- **Information related to the creation of your account and the use of the Application:** your contact details such as your first and last name, your email address, your phone number, your social network account identifier, your profile photo and 'other' information;
- **Information related to your work experience:** your curriculum vitae, your years of experience, your qualifications and certifications, any other information required by an employer with whom you are explicitly applying for a job;
- **Information related to the use of the Application, the Site and the Platform:** for example the date and time of visits, photos and geolocation data (with your consent at the punctual time when this data is specifically collected), duration of presence on the Site, pages clicked and IP address use to connect).
- **Information relating to the use of your mobile devices:** for example the type of mobile device, the unique identifier, the IP address, the operating system and the physical location of the device (geolocation, localization per beacon, both with your consent at the time of the one-time collection of this data) as well as mobile identifiers such as Apple's IDFA or Google Android's AAID, if applicable. For the sake of clarity, we do not collect physical location information (geolocation) at all times, but only at the time you clock in/out and after a geolocation permission request is sent to you in this case .
- **Information related to human resources or related to employment status:** for example employee number, hourly wage, gender identity, emergency contact details;
- **Information relating to employee shifts:** for example the date, time and place of work, your photos, the positions you occupy, your arrival and departure times at work (the Application may act as a clocking system for your employers);
- **Information related to feedback:** for example when you complete ad hoc forms on our Platforms.

Personal information of minors

Given the importance of protecting the privacy of children, we do not intend the Site, Application or Platform for minors. The nature of our services and our Site could however affect minors, for example if one of our customers employs minors.

In cases where Flash Romeo may collect personal information from minors, we will require the explicit consent of the holder of parental authority, guardian or minor aged 14 and over, as applicable.

If a parent or guardian discovers that their minor child has provided us with Personal Information without our having obtained the appropriate consent, that parent or guardian has the right, upon request, to consult the Personal Information provided by the child and/or to demand that they be deleted from our records. In this case, we ask the parent or guardian of the child to contact us at the contact details indicated in the section "Privacy Officer".



Purposes of Collecting Personal Information

We only collect Personal Information that we believe is necessary to achieve the following purposes:

- To offer our services via the Site, the Application or the Platform;
- To respond to your questions, requests, comments or complaints;
- To fulfill our business purposes, such as developing new products and services, improving or modifying our products and services;
- For data analysis purposes including the identification of usage trends, and to determine the effectiveness of our promotional campaigns and commercial activities;
- To send you administrative information, for example, information regarding our services and changes to our terms, conditions and policies;
- To send you marketing communications which we believe may be of interest to you, such as newsletters, one-time promotional emails, direct mail, business contacts or newsletters;
- To send you push notifications to your mobile device or email and SMS notifications;
- For auditing, monitoring and fraud prevention purposes;
- To comply with any applicable laws or regulations, or to act under them, including without limitation:
 - (i) respond to requests from public and governmental authorities, including public and governmental authorities outside your country of residence;
 - (ii) to protect our operations and legitimate interests or those of our parent companies;
 - (iii) to allow us to pursue available remedies or limit the damages we may sustain, etc.
- As part of Personal Information collected by the Application, to monitor your use of the Application in general, to prevent its misuse, to identify problems or bugs in the Application and to determine the functionalities to be improved;
- To facilitate and improve the use of our Site, Application and any Platform, as long as the Information collected is used in proportion to this Purpose;
- To provide your employer the services for which they have purchased a license of our Platform, including when applicable our time clock solutions;
- To send your application to an employer to whom you explicitly wish to apply;
- To send you offers of shifts, or positions that may interest you;
- For any other purpose to which you have consented;



If we wish to use your Personal Information to achieve a purpose that is not mentioned above and for which you have not consented, we will ensure that we seek your appropriate consent or notify you of the change, where permitted. by the law.

Disclosure of Personal Information

Your Personal Information will not be sold to third parties.

We share your Personal Information with third parties for (i) achieving our purposes, (ii) responding to requirements or requests made under applicable laws, (iii) performing tasks contracted to us by our customers .

Most of the time, you have already consented to such sharing, for example by accepting the terms of use presented to you when opening your account. Sometimes applicable laws also allow us to share your Personal Information with third parties without your consent, in specific cases.

More precisely, we may have to share your Personal Information, sometimes without your consent:

With our employees

As part of their work, our employees and officers may have access to your Personal Information, for example when you contact us. Their access is limited to what is necessary for the exercise of their functions.

With our service providers

Our business partners must sometimes have access to or receive certain Personal Information for the performance of their services (payment provider, cloud data hosting, maintenance, analysis, fraud detection and development). In such cases, we implement reasonable contractual and technical safeguards, including Privacy Impact Assessments, to ensure that such third parties keep strictly confidential all Personal Information they process.

Please note that these third parties may be located outside of your country, province or territory of residence. For more information on this subject, please consult the section "Disclosure and storage by third parties located abroad".

With our customers (your employer)

Your personal employment record may be visible to your employer (our client), when necessary as part of its human resources management functions.

Our customers agree not to use your Personal Information for any other purpose, including not to use it for promotional purposes.

With authorities or persons authorized by law



We may share your Personal Information if required to do so by law or if we believe in good faith that such action is necessary to:

- (i) Comply with the law;
- (ii) Comply with the order of a competent judicial authority in any jurisdiction;
- (iii) Comply with legal procedures;
- (iv) Protect and defend the rights or property of Flash Romeo;
- (v) Enforce or verify your compliance with any part of the contracts you have entered into with us, if any;
- (vi) Prevent fraud or any other illegal activity perpetrated through the Service; Or
- (vii) Act in urgent circumstances to protect the personal safety of users of our services or the general public.

With potential buyers of our company

We may have to share your Personal Information without your consent in the event of a merger, acquisition or sale, of all or part of the company, for example, as part of a due diligence. In such a case, we limit sharing to what is necessary to assess the feasibility or desirability of the transaction.

Third parties located abroad

Your Personal Information may be disclosed and stored outside your province, state, territory or country of residence.

Our business partners and service providers are sometimes located in Canada or other countries. Please be aware that we have contractual agreements with these third parties and suppliers to ensure that your Personal Information is treated in accordance with the laws applicable to us. When applicable, we conduct Privacy Impact Assessments before transferring Personal Information to another jurisdiction, for example outside of Quebec.

Time clocks

Flash Romeo, acting as a service provider, may, through the Application and/or its Platform, provide web and mobile time clock solutions to its clients (i.e. your employer), for their internal needs, time clock systems and/or time stamps (collectively referred to as "Time clocks"). When your employer includes a Time clock, it is possible, depending on the case, that a photo is taken of you or that your geolocation is recorded. For the sake of transparency, you are always informed if a photo or your geolocation is required before the information capture is carried out. Furthermore, in such a case, your employer must, before collecting this type of information resulting from a clocking: (i) have previously obtained your explicit, informed, specific and time-limited written consent; and (ii) offer you an alternative method if you object to the collection of your photo or location resulting from a clocking. Where applicable, Flash Romeo will not retain any of this information beyond the instructions given by its customers. In all cases Flash Romeo will only retain its information for a maximum period of one (1) year.



Retention and Destruction of Personal Information

Flash Romeo will only retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected, in accordance with our internal document retention policies, to comply with applicable legal, tax or regulatory requirements, until you ask us to destroy them or for a period of seven (7) years. After such period, any relevant Personal Information held by Flash Romeo will be destroyed, deleted or anonymized.

If you want us to delete the Personal Information that we hold about you through the Application, you need to use the button “Deactivation of my account” available in your profile tab on the mobile application or send an email to privacy@evolia.com. We will then notify your employer who will have ten (10) days to save the Information necessary for them to hold a complete and compliant employee record. A final confirmation will be sent to you at maximum thirty (30) days after your initial request.

Please note that this account deactivation request does not constitute a resignation request towards your employer or impacts your relationship with said employer. If you wish to resign from your employment, you are required to contact your employer directly and follow their processes and requirements.

If you wish to receive more information, we invite you to contact us. For the sake of transparency, when applicable, Flash Romeo will not retain any information arising from the Time clocks beyond the instructions given by its customers.

Security

The security of your Personal Information is a priority for us.

Your Personal Information is hosted by our service providers who undertake to use reasonable security measures to preserve the integrity and confidentiality of your Personal Information.

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

We maintain our service and all associated data with technical, administrative and physical safeguards to protect against loss, unauthorized access, destruction, misuse, alteration and improper disclosure of your Personal Information. These protection measures vary according to the sensitivity of the data in our possession and are based on the best industry standards. Unfortunately, no data transmission or storage system can be 100% guaranteed.

If you have any questions about the security of your interactions with us (if, for example, you believe that the security of any account you may have with us has been compromised), you can contact us at info@evolia.com.

Your rights relating to your Personal Information

Depending on applicable laws, where you live and how you interact with the Site, Application or Platform, you may be granted certain rights regarding the Personal Information we hold about you.

For example, you might have the right:

- Obtain **access** to the Personal Information that we hold about you;
- To **correct** any Personal Information we hold that is inaccurate, ambiguous or incomplete;
- To demand the **deletion** of your Personal Information;
- To **obtain additional information**, for example on the categories of third parties to whom we communicate your Personal Information;
- To **object to the processing** of your Personal Information carried out on the basis of our legitimate interests and to ask us to restrict the processing of your Personal Information;
- To require the **portability** of your Personal Information in a structured, commonly used and machine-readable format;
- To provide you with the **parameters** that led to automated decision-making;
- To **withdraw your consent** at any time, if we have collected and processed your Personal Information with your consent. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, or any processing of your personal information conducted in reliance on legitimate processing grounds other than consent.



- To **refuse promotional communications** transmitted by Flash Romeo;
- **File a complaint with a personal information protection control authority**, for example with a privacy commissioner or the Commission d'accès à l'information

You may file a complaint with Flash Romeo's Privacy Officer if you are dissatisfied with our handling of your Personal Information or our compliance with this Policy.

You are also permitted by law to file a complaint with a privacy commissioner or any other supervisory authority competent in the protection of personal information.

Exercise your rights

You can review, correct, update, modify or delete the Personal Information that you have provided to us using your account. Just log in to your account and make the changes.

You may also exercise your rights listed above by making a written request to our Privacy Officer. The latter can help you in the process, if you need it.

For your protection, we will only process requests to exercise rights from the same email address you use to log into your account. We may also need to verify your identity before processing your request. Depending on applicable laws, we will inform you of the procedure to follow, the processing time and the information required, if applicable. We try to respond to requests quickly, usually within 30 days.

In the processing activities covered by this Policy, Flash Romeo does not make decisions based solely on automated processing that produces legal or similar significant effects.

Your choices regarding our use and disclosure of Personal Information

The Information you provide may be used by Flash Romeo for marketing purposes, including but not limited to one-time promotional emails, direct mail and business contacts. We offer you several choices regarding our use and disclosure of your Personal Information in relation to marketing, location data, Cookies or online advertising. You can disable:

- **Our electronic communications for marketing purposes:** You can refuse to receive these emails by sending a request to be removed from the list to vieprivee@evolia.com. You can unsubscribe from our electronic mailing lists at any time. If you request it, we will not use your details for further marketing purposes. Please note that we may nevertheless send you messages for administrative purposes or directly related to your use of the Application, and you cannot refuse to receive these messages without ceasing to use it.

- **Certain location data:** You can disable the use of certain location data on your device, for example by disabling EVOLIA's location services in the privacy settings of iOS and Android. We may also retain Usage Data such as the date and time the application on your device accesses our servers.
- **Non-essential cookies:** You can deactivate these Cookies according to the procedure mentioned in the "How to manage Cookies" section.

Cookies

A cookie is a small text file that is stored in a dedicated location on your computer, mobile device, tablet or other device when you use your browser to visit an online service. This Policy includes in the term "Cookie" other tracking technologies, including but not limited to web beacons and tracking pixels. These tracking technologies are not necessarily stored on your computer or device. All Personal Information that we collect using Cookies or on our behalf is treated with the same level of confidentiality as all other Personal Information that we hold.

Essential Cookies

These Cookies are necessary for the operation of the Site and provide basic functions and may include logging into our Platforms, maintaining your session and preventing security threats. We cannot disable these Cookies in our systems without affecting the operation of the Site. However, if you wish, you can block or delete them by modifying your browser settings and force blocking all Cookies on the Site.

a. Cookies non essentiels

Les Cookies non essentiels fournissent certaines fonctionnalités non essentielles sur notre Site, à des fins fonctionnelles, analytiques ou publicitaires. Nous vous demanderons votre consentement avant d'utiliser ces Cookies.

- **Functional Cookies:** We use these Cookies to facilitate the non-essential functionalities of our Site, the Application or the Platforms, such as the integration of content such as videos or the sharing of Site content on social media.
- **Advertising cookies:** Our Site displays advertisements. These Cookies help us track the effectiveness of our advertising campaigns and personalize our advertisements so that they are meaningful to you.
- **Analytical Cookies:** These Cookies store information such as the number of visitors to our site or the page they visited. They help us understand and analyze the performance of our Site, Application and Platforms and our potential improvements.

How to manage Cookies

You can manage and disable Cookies through your browser's Cookies settings and your mobile device's advertising settings. However, if you refuse Cookies, you may not use all the features of the Site or the Platforms, and you will continue to receive advertising, but it will no longer be as relevant to your needs.



Your choices for online advertising

We may collect your Personal Information to provide you with advertisements about goods and services and may work with online advertising companies to present you with relevant and useful advertisements. This Personal Information is collected either directly from you or as indicated above in the "**Your Cookie Choices**" section.

We may also use your Mobile Advertising ID to target and measure the effectiveness of advertising campaigns. In iOS, this identifier is called "IDFA" (ID For Advertising); under Android (Google Play), this identifier is called "AAID" (Android Advertising ID).

You can control the collection and use of online advertising by expressing your preferences on your mobile devices. You can also control the use of your Mobile Advertising ID by resetting the IDFA or AAID or limiting its use in your mobile device settings.

Changes to this Privacy Policy

We revise this Policy from time to time to comply with applicable laws and respect our operations. If we update this Policy in a material way, we will notify you by sending you a notice either on our Platforms, Site or Application or by email. However, in any other circumstance, the posting of a new version of the Policy on our Site or your continued use of the Application, Site or Platforms will suffice in terms of notice and consent to changes to the Policy.

Technical Support

For any question related to your personal record on the Application and on subjects relating to your contractual employment relationship with your employer, for example, your name, address, telephone number, availability and shift, we invite you to communicate directly with your employer.

For any question related to a technical problem of the Application regarding your access or the use of its functionalities, we invite you to contact us via the following address: support@evolia.com.