



recrutement
international

PRIVACY POLICY

SUJET : Privacy policy

DISTRIBUTION : All members of the **rm group**.

APPROUVÉ PAR : Régis Michaud, President

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Introduction

Purpose of the policy

Privacy and personal information protection are fundamental principles for the **rm group**. In this policy, we are committed to safeguarding these aspects in accordance with applicable laws. We strive to ensure this protection by collecting, processing, and sharing information that identifies an individual only with their consent, unless permitted or required by law, in which case your consent will not be necessary.

The objective of this Policy is to inform users about how the **rm group**, or any person acting on its behalf, collects and uses their personal information, as well as the reasons behind this collection. We have formulated this Policy in clear language to ensure that users give their consent knowingly. Aux fins de cette Politique, les "renseignements personnels" englobent toutes les informations permettant d'identifier une personne ou identifiables. Dans la mesure du possible, nous utiliserons, pour ces données, des anonymes, pseudonymes et/ou des abrégés afin qu'elles ne puissent plus être liées à une personne.

Scope

This policy applies to all employees, contractors, consultants, third parties, and any other individuals who have access to the confidential data and information of the **rm group**, whether stored, processed, or transmitted. Each individual must adhere to and strictly comply with these guidelines to ensure the adequate protection of confidential data.

Responsability

Privacy responsibility is crucial for our company. Every member, regardless of the division within **rm**, must play their role to ensure compliance with high standards of privacy and data protection.

Management and Senior management

The Management and Senior Management have the essential role of promoting data confidentiality and security within the organization. This involves approving and supporting the privacy policy, allocating necessary resources, and appointing a Privacy Officer responsible for ensuring compliance and updates to the policy.

Equity Officer

The Equity Officer is responsible for ensuring compliance with and implementation of privacy policies. They serve as the primary point of contact for all matters related to data privacy. Additionally, they are tasked with regularly raising awareness and providing training to employees on privacy policies, as well as coordinating audits and periodic assessments to ensure compliance.

Managers and supervisors

Managers and supervisors ensure that their teams understand and adhere to the privacy policy. They enforce this policy within their team, managing any potential breaches, and promote a culture where privacy is a priority in day-to-day operations.

Employees

Each employee is required to read, understand, and adhere to the privacy policy and its guidelines. They are also obligated to report any violation or suspicion of violation of this policy. Additionally, they must undergo continuous training on best practices regarding data privacy and security.

Third parties

Third parties with access to our data must respect and adhere to our privacy policy, refraining from disclosing or using the data outside of authorized boundaries.

Definitions and terminology

The **rm group** processes various types of data and confidential information. It is imperative that every employee understands these categories to ensure appropriate and secure handling of this data. Types of confidential data include, but are not limited to:

Customer Data

"Customer Data" encompasses any information related to the clients of the **rm group** and its subsidiaries, such as contact details, purchase histories, preferences, accounts, payment data, etc.

Financial Data

"Financial Data" includes financial information of the company, such as financial statements, bank accounts, transactions, budgets, forecasts, tax reports, etc.

Intellectual properties

"Intellectual Properties" refer to patents, trademarks, copyrights, trade secrets, and any other information related to the intellectual property of the **rm group**.

Personal Data

"Personal Data" refers to any information relating to the employees of the **rm group** Recruitment, including identification data, contact details, performance evaluations, employment history, etc.

Business strategies

"Business Strategies" include plans, objectives, internal policies, operational methods, market studies, competitive analyses, and any crucial information for business operations.

Research and development data

Research and Development Data" pertains to discoveries, prototypes, designs, trial results, concepts, project plans, and other data related to the research and development of products or services.

Other sensitive information

In addition to the mentioned categories, "Other Sensitive Information" includes any data and specific information unique to the **rm group** that requires protection and appropriate management in accordance with this policy.

Types of confidential data and information

Identification of the various categories of confidential data handled by the organization.

At the **rm group**, we handle a variety of confidential data and information to successfully carry out our mission of international recruitment. These data can be classified into several essential categories:

1. Personal identification data :

This category includes names, addresses, phone numbers, email addresses, passport numbers, and other similar information that specifically identifies an individual.

2. Financial and payment information:

This category includes data related to financial transactions, bank accounts, credit card or payment information, and any other sensitive financial information associated with our clients, candidates, partners, and employees.

3. Professional history and education :

This category encompasses data related to individuals' professional backgrounds, qualifications, degrees, skills, past work experiences, and educational achievements, as well as any other pertinent information associated with their careers and education.

4. Medical and health data :

This category encompasses information such as medical records, health conditions, medical history, allergies, disabilities, and any other data related to an individual's physical or mental health.

5. Appraisals and Evaluations:

This category encompasses professional evaluations, feedback, performance appraisals, skills assessments, test results, and any other assessments related to individuals' effectiveness and performance.

6. Correspondence and Communication :

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This category includes all communication exchanged between the **rm group**, our clients, candidates, and partners. It encompasses emails, messages, interviews, reports, and any other form of communication.

7. Sensitive and Legal Information:

This category includes data related to ongoing litigation, investigations, nondisclosure agreements, contracts, legal agreements, and any other legally sensitive matters.

8. Other sensitive data :

This includes all other data specific to our international recruitment business and requiring appropriate protection in accordance with this policy.

It is imperative that every employee of the **rm group** understands the sensitive nature of this data and its importance in our mission to ensure its protection and responsible use.

Data usage

We use the personal data we collect for various purposes, in accordance with the principles of legality, fairness, and transparency. Here is how we use this data:

Providing and Improving Our Products and Services: We use data to provide our products and services, personalize your user experience, and meet your individual needs. This may include customizing content, features, and recommendations to enhance your satisfaction.

Communication with users: We use your data to communicate with you, including responding to your requests, questions, and concerns. We may also inform you about updates, special offers, promotions, and other relevant information regarding our products and services.

Analysis and Improvement of Our Services: We analyze the data collected to understand how our users interact with our products and services. This allows us to continually improve our offerings, optimize features, and identify areas requiring enhancements.

Compliance with Legal and Regulatory Obligations: We may be required to process and disclose your personal data in compliance with applicable laws and regulations, including in the context of investigations, litigation, or other legal proceedings.

Security Measures and Fraud Prevention: We use your data to protect the security, integrity, and availability of our systems and services. This includes detecting and preventing fraud, malicious activities, or unauthorized actions.

Responding to Comments and Reviews: If you choose to share comments, reviews, or evaluations, we may use this information to improve our products and services and respond to your feedback.

Research and Development: We may use data for research and development purposes to innovate and continuously improve our products and services.

Data storage

We will retain your personal information for as long as necessary to fulfill the purposes for which it was collected and to comply with our legal obligations.

To determine the appropriate retention period for personal data, we consider the quantity, nature, and sensitivity of the personal data, the risk of harm resulting from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and the possibility of achieving these purposes by other means, as well as applicable legal requirements.

Security and data protection

We have implemented appropriate protection measures, both in our procedures and the technology we use, to ensure that your personal information is as secure as possible. This includes firewalls, encryption, and access controls.

We will ensure that all third parties we engage to process your personal information implement similar security measures. They will only process your personal information in accordance with our instructions and will also be held to strict confidentiality obligations. Your privacy is important to us, and we take steps to ensure that it is respected at every stage of the process.

Training and awareness

Initial training

During their onboarding process, each new employee will undergo comprehensive training on data protection. This training will highlight best practices to adopt and clarify the expected behaviors, as well as the consequences of non-compliance with these guidelines.

Ongoing training

The company is committed to providing regular training for all employees to enhance their understanding of the subject and ensure continuous adaptation to new practices and policies.

Management of privacy incidents

All employees, regardless of their position, must adhere to and implement the principles outlined in this document. Any violation of this policy will be taken seriously and may result in disciplinary action, in accordance with the provisions stated in this policy. It is imperative for every employee or collaborator to promptly report any situations or behaviors they believe to be in violation of the practices outlined in this policy, using the appropriate reporting channels established by the company.

Effective date and revision

This policy, effective as of August 16, 2023, will be reviewed annually to align with laws and regulations.