

Policy on the protection of personal information

Bromont Immobilier Inc. is keen to preserve the trust you bestow on us when you share with us your personal information.

For the sake of transparency, we invite you to consult our Policy on the protection of personal information (hereinafter the “Policy”), which concerns the collection, use and processing we do of your personal information and contains important information about your rights in relation to them.

If you do not want Bromont Immobilier Inc. to collect, use and/or communicate your personal information in accordance with this Policy, we ask that you avoid transmitting personal information to us and not use our website <https://www.bromontimmobilier.com/> (the “Website”).

It is important to note that refusing to communicate certain necessary personal information with us may limit your access to some of our services or products.

1. Information to which the Policy is applicable

The Policy covers all “personal information” collected by Bromont Immobilier Inc. which concerns individuals, excluding employees and agents of Bromont Immobilier Inc. as well as candidates applying for employment with us. The term “personal information” is interpreted generally and includes any type of information concerning an individual or allowing the identification of an individual.

It is important to note that, generally speaking, your professional information does not constitute personal information within the meaning of the Policy. Furthermore, this Policy does not apply to information relating to more than one individual when their identity is unknown and cannot be inferred on the basis of this information.

2. Collection and nature of personal information collected by Bromont Immobilier Inc.

Bromont Immobilier Inc. may collect personal information from you whenever you interact with us whether in person, by telephone, by email, by post, by video conference, by text message or on social media; when you visit our offices or our website; or when you participate in events and/or contests organized by us.

In the course of our interactions with you, we may ask you to provide personal information about yourself and/or others. This personal information may include:

- Information relating to your identity, such as your first and last name, your date of birth as well as any information necessary to demonstrate your identity (including a copy of a document personal identification, such as your passport or driver's license);
- Information relating to your contact details, such as your home address and personal contact details (telephone number, email address, etc.);
- Marketing information and your communication preferences, as well as related information such as your comments and responses to social media posts or surveys; and
- Billing and other financial information (your billing address, payment details, purchasing budget, etc.).

Additionally, as explained in detail below in section 10, certain non-identifiable information is automatically collected when you browse our Website or open the marketing emails we send you.

3. Purposes for the collect, use or disclosing personal information

Generally, Bromont Immobilier Inc. collects, uses and discloses the personal information of its customers and others for the primary purpose of establishing, maintaining, providing and maintaining our relationships with our customers (and potential customers) as well as to ensure service offering for our various products.

We may also collect, use and disclose personal information:

- For administrative and management purposes (such as choosing and managing our third-party service providers, billing, payment processing and collections, etc.);
- For marketing and business development purposes;
- For research and development purposes of our service and product offerings;
- To ensure the security of our staff, our customers, the Resort, our website, our equipment and our network, as well as to prevent and protect against fraud;
- In order to enforce our rights and ensure payment and recovery of any debt;
- For any other purpose authorized or required by law.

In addition, Bromont Immobilier Inc. may ask for your consent in order to use your personal information for certain secondary purposes, notably for marketing purposes in order to communicate with you about our various products and service offerings, including sending you publications and invitations to events which we think may be of interest to you.

4. Communication of your personal information

As part of our business operations, Bromont Immobilier Inc. may share your personal information with our third party service providers, partners and subcontractors and others we use to support our business. These include, but are not limited to, third parties who provide website, application development, hosting and maintenance services to us. Additional information on this type of communication is available below in sections 8 and 9.

In addition, Bromont Immobilier Inc. may, at any time, disclose your personal information with your consent or as required or permitted by applicable law, including to government or regulatory authorities, courts and enforcement agencies. Amongst others, your personal information may be disclosed at all times to the Organisme d'autorégelmentation du courtage immobilier du Québec or to the Fonds d'assurances responsabilité du courtage immobilier du Québec.

Moreover, if in your brokerage contract with Bromont Immobilier Inc., you have authorized Bromont Immobilier Inc. to provide information about your property and related personal information to use information listing services for agencies or brokers, this information will be disclosed to the service provides identified in your brokerage contract.

5. Limitations on the collection, use and disclosure of personal information

Bromont Immobilier Inc. strives to collect, use and communicate only the personal information necessary for the purposes established above.

6. Your consent and your right to withdraw your consent

Where possible, we endeavor to obtain consent to the collection, use and disclosure of personal information directly from the individual concerned.

This consent may be express or implied. For example, if you decide to add your name to one of our mailing lists, such as our newsletter, you explicitly consent to the application of this Policy. Your consent to the collection, use and communication of this information will be implied each time you voluntarily communicate your personal information to us in any way (in person, by email, by telephone or other).

In certain cases, it is possible that you send us personal information concerning another individual. When this is the case, you declare, by sending us the information in question, that you have obtained, before sending it to us, the necessary consent or authorization from these individuals allowing us to collect, use and communicate their personal information for the purposes set out in this Policy.

At any time, upon reasonable notice, you may modify or withdraw your consent to the collection, use and communication of your personal information by Bromont Immobilier Inc. Please note, however, that certain personal information is necessary to provide our services and product offerings and that modification or withdrawal of consent could affect their availability to you.

If you wish to modify or withdraw your consent, please contact our Privacy Officer, whose contact details are indicated below in section 13.

Furthermore, please note that it is possible for you, at any time, to remove your name from one of our mailing lists by using the unsubscribe mechanism found at the bottom of our emails.

7. Duration of retention of personal information

Bromont Immobilier Inc. only retains your personal information for as long as it is needed for the purposes for which it was collected or as required by law. Bromont Immobilier Inc. has implemented procedures for the secure destruction or erasure of personal information that is no longer required.

8. Place of storage and protection of personal information

Bromont Immobilier Inc. may store and process your personal information in its offices in Bromont or elsewhere. Our servers are located in Quebec, Canada, and some of your personal information may also be stored with third-party service providers located in the United States.

We are keen to maintain the confidentiality of the information collected and have put in place measures to ensure that your personal information is managed responsibly and appropriately. The security measures in place may take various forms and include the adoption of internal policies and procedures, the training of Bromont Immobilier Inc. personnel in the collection, use and processing of your personal information, the implementation of systems restricted access to our facilities, networks and files.

9. Our third-party service providers

In the course of its activities, Bromont Immobilier Inc. may from time to time use third party service providers, who are contractually required to protect the personal information transferred to them.

Although many of our third-party service providers are located in Quebec, some of them are located elsewhere in Canada and/or the United States, where privacy laws do not provide the same type of protection. protection than those offered by Quebec legislation.

If you have any questions regarding the collection, use, communication or storage of your personal information by our service providers outside Quebec, we invite you to contact our Privacy officer, whose contact details are given below in section 13.

10. Navigation on our Website, marketing communications and use of “cookies”

When you browse our Website and/or consult our marketing emails, Bromont Immobilier Inc. may use cookies and/or other technologies to collect certain personal information.

This information may include: your IP address, your geographic region (as determined by your IP address), data about your clickstream on our website, the date and time of your visit, information about your device and on your network, such as the browser you use and its configuration, your connection speed, the pages you view or search for on our website, the links you click, what you download, the response time of our pages, any downloads or other errors, the length of your visit, and whether emails we send to you are opened.

Generally, this information allows us to improve the functionality of our website or to personalize the content of our marketing communications.

11. Accuracy of your personal information and access

It is important to Bromont Immobilier Inc. to ensure that all information in its possession is as accurate, current and complete as possible.

At any time, you can ask us for access to your personal information and demand that we correct it if it is inaccurate by contacting our Privacy officer, whose contact details are indicated below in section 13.

It is possible in certain circumstances that we refuse to comply with your request for access or that we limit it if the applicable law requires it or allows us to do so, notably for security reasons. If this is the case, we will provide you with a detailed explanation of why we cannot give you access to your personal information.

12. Modification of this Policy

This Privacy Policy is effective upon posting on our Website and may be subject to revision on a periodic basis. In the event of any modification, an appropriate notice will be posted on our Website.

Any access to our Website or communication with us of personal information after any modification to this Policy constitutes acceptance of the modifications made.

In order to fully understand the scope of your consent to the collection, use and processing of your personal information, we invite you to consult this Policy on a periodic basis.

13. Privacy officer's contact information

For any questions relating to this Policy, request for access to your personal information or to report a violation of the Policy, please contact our Privacy officer at the following address:

Mr. Charles-Antoine Pouliot

Information Technology Director, Bromont, montagne d'expériences

vieprive@bromontmontagne.com