

PRIVACY POLICY

Website - HUDL

01. Scope

This Privacy Policy (hereinafter: the “Policy”) applies to HUDL (hereinafter: “HUDL” or “we”).

The Policy applies to personal information (as defined below) relating to users of the website: <https://www.hudl.ca> (hereinafter: the “Website”). It outlines how we manage and protect such information, within the limits imposed by applicable laws.

This Policy does not apply to personal information relating to our employees or our subcontractors.

The following sections provide you with information on:

- The nature of the personal information we collect and the means by which we collect it;
- The scope of your consent;
- The security and governance measures we implement to protect such information;
- The purposes for which it is used;
- How it is disclosed and retained;
- Your rights with respect to such information and how to exercise them.

02. Personal Information We Collect

“Personal Information” means any information relating to a natural person that allows that person to be identified, directly or indirectly.

We collect only the Personal Information about you that is necessary to establish, manage, and maintain our relationship with you. In most cases, this collection is limited to the following

Personal Information:

- First name;
- Last name;
- Email address;
- Telephone/mobile number;
- Professional information, including information typically found on a résumé;
- As well as cookies (see Section 9 of the Policy).

In certain cases, we may collect Personal Information through the Website, in particular when you apply for a position online via the following link: Careers. More broadly, we may also collect such information during telephone conversations or email exchanges with one of our employees or representatives.

03. Your Consent

Your consent to the collection, use, or disclosure of your Personal Information must be clear, free, and informed. It must be given for the specific purposes identified in this Policy.

Depending on the nature and sensitivity of your Personal Information, your consent may be explicit (such consent may be given verbally, in writing, or electronically) or implied (for example, when you voluntarily provide Personal Information).

BY USING THE WEBSITE, YOU CONSENT TO YOUR PERSONAL INFORMATION BEING COLLECTED, USED, DISCLOSED, AND RETAINED IN ACCORDANCE WITH THIS POLICY. PLEASE READ IT CAREFULLY.

If you do not agree, please discontinue use of the Website. Unless otherwise required by law, you may withdraw your consent at any time by providing reasonable notice. Please note that if you choose to withdraw your consent to the collection, use, or disclosure of your Personal Information, certain features of our Website may no longer be available to you, or we may no longer be able to provide you with certain services.

04. Security and Governance

Information security is a priority for us. In addition to the administrative measures described in the sections that follow, we have implemented physical and technological safeguards that are reasonable, taking into account the sensitivity of the Personal Information, its use, its quantity, its distribution, and the medium on which it is stored.

With respect to administrative measures, we have adopted policies that provide for the following:

- A framework governing the use, disclosure, retention, and destruction of Personal Information;
- The roles and responsibilities of our employees throughout the lifecycle of such information, including a policy on the use of technological equipment;
- A process for handling complaints relating to the protection of such information.

05. Use of Personal Information

We use the Personal Information of Website users solely for the following purposes:

- To provide the Website and ensure its optimal operation;
- To identify a Website user and ensure the authenticity of such identification;
- To review your job applications and invite you to interviews;
- To obtain statistics on the use of the Website and our products and/or services;
- To send you information about job opportunities and, in certain cases, promotional offers;
- To provide you with technical support, where applicable.

All our employees who handle Personal Information are bound by confidentiality obligations and have received appropriate training. In addition, they may only access the Personal Information necessary for the performance of their respective duties. In the event of a breach, our governance policies and practices provide for sanctions.

We use Personal Information only for the purposes set out above, unless we are authorized by law, in very limited circumstances, to do so without your consent.

06. Disclosure of Your Personal Information

To whom? : We may disclose Personal Information to third parties in specific circumstances permitted by law. The table below summarizes these circumstances.

RECIPIENT	PURPOSE	MEASURES
To subcontractors.	We enter into contracts with subcontractors and agents in order to provide you with a service and/or improve existing services.	A contract requires subcontractors to: • Use only the Personal Information necessary to provide the service; • Refrain from disclosing or communicating Personal Information without our consent; • Implement robust security measures; • Allow us to audit such measures; • Notify us immediately in the event of a confidentiality incident; • Destroy Personal Information at the end of the contract.

RECIPIENT	PURPOSE	MEASURES
To another party in connection with a commercial transaction. Such a transaction is defined as the sale or lease of all or part of our business or its assets, a change in our legal structure through a merger or otherwise, the obtaining of a loan or any other form of financing, or the granting of a security interest to secure one of our obligations (hereinafter: the “Commercial Transaction”).	To complete a Commercial Transaction.	A contract requires the other party to: • Use only the Personal Information necessary to complete the Commercial Transaction; • Implement robust security measures; • Refrain from disclosing or communicating Personal Information without our consent; • Notify us immediately in the event of a confidentiality incident; • Destroy the Personal Information if the Commercial Transaction is not completed or if it is no longer necessary for its completion.
To legitimate authorities.	To comply with a court order or decision, including a valid search warrant, or with a regulatory authority, we may be required to disclose Personal Information.	The laws governing these authorities require them to implement measures to protect and preserve the confidentiality of your Personal Information. As a general rule, we refuse to grant access where the request is not legally binding.
To our lawyers or legal counsel.	To defend our interests or assert our rights, we may, in certain cases, disclose your Personal Information.	Both the law and the engagement letters we enter into require our lawyers to protect the confidentiality of all communications with them.

Where? In the course of providing our services, we do not disclose your Personal Information outside of Québec.

07. Conservation

We retain Personal Information only for as long as necessary to fulfill the purposes for which it was collected, unless legal requirements or contractual obligations recognized by law require

us to retain it for a longer period. We reserve the right to establish, from time to time, policies governing the destruction of Personal Information. Upon request, we can inform you of the applicable retention period for your Personal Information.

If you request the deletion of your Personal Information, we will make reasonable efforts to do so, unless we are required or permitted by law to retain it.

08. Your Rights

With respect to your Personal Information, you have the following rights:

- The right to be informed of its use, disclosure, retention, and destruction, as outlined in this Policy;
- The right to access your Personal Information and, where applicable, obtain additional details on how we use, disclose, retain, and destroy it;
- In certain cases, the right to object to, restrict, or withdraw your consent to these activities by providing reasonable notice sent to the email address provided at the end of this Policy;
- The right to have your Personal Information corrected if it is inaccurate or ambiguous, and to have it completed if it is incomplete;
- The right to request the deletion of your Personal Information when it is outdated or when the purposes for which it was collected have been fulfilled, subject to our legal obligations;
- The right to be informed of any confidentiality incident involving your Personal Information that may cause you serious harm. For this purpose, we maintain a register of all confidentiality incidents and assess the harm they may cause.
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You may exercise these rights by sending an email to the address provided at the end of this Policy. We will respond to your requests within 30 days of receipt, unless the law permits an extension of this timeframe.

Subject to the restrictions provided by law, if we refuse to provide access to or correct your Personal Information, we will inform you of the reasons for such refusal, provide you with information on your available remedies, and identify the applicable provisions of the law.

If we refuse to rectify your Personal Information, we will allow you to submit written comments to be included in your file regarding the information that was the subject of the refusal. We will also retain the Personal Information that was the subject of an access request for as long as necessary to allow you to exhaust the remedies provided by law.

09. Cookies

Your use of the Website allows us to automatically collect certain information, namely cookies, which may include:

- The Internet Protocol (IP) address of your computer;
- Your geolocation area;
- The operating system you are using;
- Your preferred language;
- The identity of your Internet service provider;
- The date and time you accessed the Website;
- The previous website you visited that referred you to our Website;
- The content viewed and downloaded on our Website or the number of visits.

Generally, the cookies we use fall into three categories:

- **Technical cookies:** These cookies are used throughout your browsing session to facilitate the use of our Website. For example, a technical cookie may be used to remember your username to facilitate login, or to remember your preferences or selected options;
- **Analytical cookies:** These cookies are anonymous and are used to collect statistics on the use of our Website;
- **Advertising cookies:** These cookies may be set by the Website or by other websites delivering advertising. They collect information anonymously and build your visitor profile.

If you wish, you may configure your browser to notify you when you receive cookies or to refuse them. You can delete cookies from your computer's hard drive, block their creation, or receive a warning before a cookie is stored. However, doing so may affect your use of our Website, and you may no longer be able to access all of its features. We invite you to consult the Ads Settings and Network Advertising Initiative websites, as well as your browser's instructions or help section, for more information about cookies.

10. Person in Charge of the Protection of Personal Information

The person responsible for the protection of Personal Information at HUDL is Ariane St-Jean, Communications, Marketing & Web Manager. For any questions or requests regarding this Policy, you may contact her at the following email address: astjean@hudl.ca



11. Modification

HUDL reserves the right to modify the content of this Policy at any time. Any changes will be posted on our Website and brought to your attention upon login by means of a notice. We recommend that you print a copy of this Policy for your records and review this section of our Website regularly.