

How We Manage Personal Information

A plain language summary of our privacy governance practices

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Quebec law requires us to have written policies and practices governing how personal information is handled, and to publish a summary of them in clear and simple language. This is that summary. It sits alongside our Privacy Policy, which explains what we collect from you and what rights you have. The full internal policy is available to anyone who asks for it.

Who is responsible

The people who exercise the highest authority at Cables PTI Cables Inc. are responsible in law for protecting personal information. They have delegated that role in writing to a named Privacy Officer, who runs the privacy programme day to day, approves our practices, handles requests and complaints, leads our response to any incident, and reports to senior management on how we are doing. The Privacy Officer's name and contact details are published in our Privacy Policy.

How we decide what to collect

We collect only the personal information we actually need for a purpose we have identified in advance, and we tell people what that purpose is at the time we collect it. We do not collect sensitive information, such as a Social Insurance Number or health information, unless it is genuinely necessary or the law requires it. Where the law requires consent, we ask for it separately and in clear terms, we never use pre-checked boxes, and consent can be withdrawn.

Who handles it, and how access is controlled

Access to personal information is limited to the people who need it to do their job, by role, in each system. Everyone who works here is responsible for protecting the information in their care, for using it only for the purpose it was collected for, and for reporting anything that looks like a problem to the Privacy Officer the same day. Managers are responsible for their teams following these rules. When someone leaves, their access is removed as part of a defined offboarding

process. Anyone outside PTI who handles personal information for us must be under a written agreement that requires them to protect it, to use it only for the work we have asked them to do, and not to keep it once that work is finished.

How long we keep it, and how we destroy it

We keep personal information only as long as we need it for the purpose it was collected for, or as long as a tax, employment or other legal obligation requires. We set those periods in writing, by type of record, in a retention and destruction schedule that senior management has adopted. When a period ends, paper is destroyed through a bonded shredding service that issues certificates of destruction, and electronic records are securely deleted. We keep a record of what has been destroyed.

How we protect it

We use security measures that are proportionate to how sensitive the information is: multi-factor authentication, full-disk encryption on computers and servers, endpoint protection, email filtering, patching, and both on-site and off-site backups. We assess the privacy risk before adopting a new system, before a significant change to an existing one, and before any personal information is communicated outside Quebec.

If something goes wrong

We keep a register of confidentiality incidents. When one happens we act to reduce the harm, record it, and assess whether it presents a risk of serious injury. If it does, we notify the Commission d'accès à l'information du Québec and the people affected, promptly.

Questions, requests and complaints

You can ask us for access to the personal information we hold about you, ask us to correct it, ask for a copy in a portable format, or ask us to stop using or circulating it. You can also complain about how we have handled your information. Contact the Privacy Officer using the details in our Privacy Policy. We respond within 30 days. If we refuse a request we will tell you why and tell you how to challenge that decision, and you can take a complaint to the Commission d'accès à l'information du Québec at any time.

Privacy Officer: Elie Bengio, Chief Information Officer

Email: ebengio@pticables.com

Telephone: 514-531-8705

Mail: Cables PTI Cables Inc., 91 Hymus Boulevard, Pointe-Claire, Québec H9R 1E2

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