



KONTRON CANADA INC. ("KONTRON") POLICY ON PERSONAL INFORMATION MANAGEMENT

A. SCOPE

Kontron recognizes the importance of protecting personal information and is committed to complying with all applicable laws and regulations regarding the protection of personal information to safeguard the confidentiality of information pertaining to its employees and partners.

We have adopted this policy to outline how we collect, record, use, protect, and communicate your personal information, which is necessary for fulfilling our professional and legal responsibilities and operating our business.

Ultimately, this policy reflects the requirements imposed by federal and/or provincial laws in Canada, as well as our commitment to meeting the expectations of our employees and partners regarding the protection of their personal data.

B. PERSONS COVERED BY THIS POLICY

This policy primarily applies to:

- Employees
- Individuals applying for employment
- Company partners
- Individuals navigating the website managed by our parent company at www.kontron.com

C. COLLECTED PERSONAL INFORMATION

Under the law, personal information is defined as any information about an individual that can identify them.

The personal information we may collect depends on your relationship with our company and may include the following:

- Identification information:
 - Name
 - Address and contact details
 - Social Insurance Number
 - Age
 - Gender
 - Date of birth
- Authentication information:
 - Password
- Financial information:

- Employment details
- Compensation
- Banking information
- Images and photographs:
 - From security cameras if you enter Kontron facilities or participate in Kontron activities
 - During social events

To provide services to our partners and offer appropriate benefits to our personnel, the collected personal information must be accurate, complete, and up-to-date. We rely on your cooperation and encourage you to inform us of any changes to your personal information.

D. PURPOSES OF COLLECTING PERSONAL INFORMATION

Kontron only collects personal information that it reasonably deems necessary for the purpose of offering products and services, conducting its operations, and fulfilling its legal obligations.

i) **Personal Information of Employees:** Kontron collects, uses, and communicates the personal information of its employees to manage business operations and comply with legal obligations, including payroll processing, providing benefits, administering performance tools, and managing company programs and policies.

ii) **Personal Information of Job Applicants:** In the context of a job application, whether posted on the Kontron website or elsewhere, you may provide information such as a resume. We may use this information to respond to your request or consider you for employment purposes.

iii) **Personal Information of Partners:** In the course of operating our business, we may collect personal information from our partners. This information is collected to provide our products and services and comply with legal obligations.

iv) **Others:** We may also collect personal information through the website www.kontron.com. When you access the site, Kontron records the necessary information to provide you with access, for the website's operation, and to comply with security and legal requirements for site operation, such as passwords, IP addresses, and browser settings. We also collect information about your activities during your visit to personalize your experience on the website, such as recording your preferences and settings, and collect statistics to help improve and further develop our website, products, and services. For more information, please refer to the Kontron Group Privacy Statement at the following address: <https://www.kontron.com/en/privacy-statement>

E. WAYS OF COLLECTING PERSONAL INFORMATION

We may collect personal information in various ways:

- By phone
- In person

- Through forms and digital interfaces
- Using technologies such as the website

We collect your personal information only if we have the required legal basis to do so. In all cases, we will be happy to help clarify the specific legal basis that applies to your situation. These legal bases include, among others:

- Obtaining consent
- Signing forms
- Executing a contract
- Under a legal obligation
- For vital interests (urgent notices or recalls)
- For legitimate interests

In some cases, we may use your personal information without obtaining your consent if the law allows us to do so to meet our legal obligations (e.g., court orders, fraud prevention, or investigations).

F. RECORDING, STORAGE, PROTECTION, AND DISCLOSURE OF PERSONAL INFORMATION

i) **Recording:** The personal information we collect is recorded in various locations, including our servers and internal management systems.

ii) **Protection:** To ensure the protection of this information, we have implemented certain processes and controls, such as:

- Utilizing secure facilities and tools and practices compliant with industry standards and applicable laws
- Establishing internal policies and controls
- Employee training
- Limiting access to personal information
- Implementing security measures (organizational, physical, and technological measures, such as office access cards, visitor logs)

iii) **Storage:** Kontron complies with laws and regulations regarding the retention and destruction of documents. As a result, Kontron retains information as long as it is necessary for legal, regulatory, or administrative purposes, or for audit purposes and to fulfill our business activities and comply with our business rules.

iv) **Disclosure of Personal Information to Third Parties:** Kontron may disclose your personal information to our affiliated companies and other individuals or organizations if it is necessary to achieve the objectives listed in this policy. Examples include financial institutions, government agencies, regulatory authorities, and business partners. Kontron requires that third-party providers adhere to confidentiality and all requirements stipulated in applicable privacy laws and regulations. A prior verification of their compliance with personal information protection is always conducted. These third parties can only use personal information for the specific purposes for



which we provide it. In most cases, personal information is kept in Quebec and Canada. In certain specific circumstances, Kontron may collect, use, communicate, or record personal information outside of Canada, but in a very restricted manner.

G. RIGHTS REGARDING PERSONAL INFORMATION

i) **Access to Your Personal Information:** Everyone has the right to review the personal information about them in our possession and request a copy. The right to access personal information is subject to certain legal restrictions, and we will take necessary measures to verify the identity of the person before granting access.

ii) **Correction and Updating of Your Personal Information:** You can ask us to correct or update your personal information at any time if you find it to be inaccurate.

iii) **Objection or Limitation to the Processing of Your Personal Information:** You can ask us to stop using all or part of your personal information or limit how we process it, subject to the exceptions mentioned in paragraph vii) below.

iv) **Erasement of Your Personal Information:** You can ask Kontron to erase personal information in certain circumstances, subject to the exceptions mentioned in paragraph vii) below.

v) **Refusal or Withdrawal of Your Consent:** You always have the choice not to give your consent for the collection, use, and communication of personal information about you or to withdraw it subsequently. If you choose not to give or withdraw it, we may not be able to continue services and/or our business relationship in the case of partners, and for employees/applicants, we may not be able to hire, retain, or provide benefits.

vi) **Right to Portability:** It is also possible to make a request for us to communicate, in a structured and commonly used technological format, computerized personal information you have provided or request it to be transmitted to another person or organization in the same format. This right to portability is limited to computerized personal information collected from you.

vii) **Exercise of Your Rights and Limitation:** If you want to exercise any of these rights, please send your request in writing to the attention of the Personal Information Protection Committee at the email address confidentialite.canada@kontron.com or by mail to: 4555 Ambroise-Lafortune Street, Boisbriand, Quebec, Canada, J7H 0A4. A response to any request will be provided within thirty (30) days of its receipt. However, some requests may not be accepted, especially considering defined retention periods in the law, our legal and contractual obligations to you, or if the information is in the form of electronically archived data as part of archiving or automatic backup procedures.

H. COMPLAINT

Kontron is responsible for the personal information under its custody or control and has appointed a Privacy Protection Officer who is responsible for ensuring compliance with the Act to



modernize legislative provisions as regards the protection of personal information applicable in the province of Quebec, Canada. For any concerns, requests, or complaints regarding this personal information protection policy, please contact the Privacy Officer, Jason Larocque, by email at confidentialite.canada@kontron.com or by mail to:

Privacy Protection Officer Jason Larocque 4555 Ambroise-Lafortune Street Boisbriand, Quebec, Canada, J7H 0A4

Jason Larocque may forward the request to the Personal Information Protection Committee composed of:

- Vice President Finance and Administration
- Director Human Resources
- Legal Counsel
- Chief IT Officer

A response to any request will be provided within thirty (30) days of its receipt. Any incident will be recorded in the incident register. In addition, any confidentiality incident must undergo a "serious harm risk" assessment process to determine whether the incident should be reported to the Quebec Access to Information Commission and the individuals concerned.

I. QUESTIONS AND COMMENTS

If you have questions or suggestions about this personal information management policy or how we use your personal information, please contact the Personal Information Protection Committee at the email address confidentialite.canada@kontron.com.