



9403-9419 QUÉBEC INC.
PRIVACY POLICY RELATED TO
CUSTOMERS AND WEBSITE VISITORS

Approved by the Board of Directors and the data controller

The following *Privacy Policy related to Customers and Website Visitors* (hereafter the “**Privacy Policy**”) is intended to inform you of the practices of 94039419 Québec Inc. (hereafter “**Rotorcrew**”) regarding the governance and confidentiality of personal data related to its clients and website visitors (hereafter collectively the “**Clients**”) <https://www.rotorcrew.com/>.

The Privacy Policy describes how Rotorcrew collects, processes, stores, communicates and transfers personal data when visiting, using Rotorcrew’s services, or making a purchase from the website or otherwise communicate with Rotorcrew (hereafter collectively the “**Services**”). In addition, the purpose of this Privacy Policy is to define the principles applicable to the right to access, the right to erasure as well as the right of rectification of such data.

This Privacy Policy applies to all Rotorcrew’s agents, suppliers and partners who may have access to personal data in the performance of their duties.

1. Publication of the Privacy Policy

Rotorcrew publishes its Privacy Policy on its website and distributes it by any means likely to reach its Clients. It may be updated to reflect changes in their practices or for other operational, legal, or regulatory purposes. Such updates will be communicated by any appropriate means.

2. Personal Data Collected

The scope of personal data collected depends on the Clients’ interactions with Rotorcrew’s team and uses of its Services. For the purpose of the Privacy Policy, personal data refers to any information relating to a natural person that directly or indirectly identifies them is considered as personal data. The following sections describe the categories and specific types of personal data that may be collected.

3. Collection and Process of Personal Data

In the conduct of its Services, Rotorcrew collects personal data from its Clients, including the following information:

- Contact information, such as first name and last name, postal address, email address, IP address and phone number;
- Billing information, such as billing address, banking information, credit card or payment system information;



- Data regarding the use of Rotorcrew Services, including Client account data and technical data related to visits or any other data collected through cookies or similar tools;
- Any other personal data requested and obtained.

4. Collection of Children's Personal Data

In the conduct of its Services, Rotorcrew does not communicate to Clients under the age of 16 and does not knowingly collect, process or disclose personal data about them. Any Client under the age of 16, or the parent or guardian of a Client under the age of 16, may request the erasure of their personal data collected by Rotorcrew by reaching to Rotorcrew's data controller.

5. Collection of Personal Data from Third Parties

Rotorcrew collects the personal data of its Client from third party service providers. Where required, Rotorcrew informs its Clients of the personal data collected from these suppliers, the purposes of the processing for which the data is intended, the categories of persons who have access to the data within the company, the duration of storage of the data, and the contact details of the data controller. This information is provided within a reasonable time of obtaining the personal data, but not exceeding one (1) month, given the particular circumstances in which the data is processed. However, if such personal data is processed for the purpose of communicating with its Client, this information shall be provided at the latest at the time of the first communication to the said person. Finally, if it is envisaged to disclose such data to another recipient, this information shall be provided at the latest when the personal data is first disclosed.

6. Consent to Data Collection

The collection of personal data carried out by Rotorcrew is conducted with complete transparency and with the prior of the freely given, specific and informed consent of its Client, which is obtained at the time of collection by means of a drop-down menu at the entrance to the website.

In compliance with applicable laws, when collecting personal data, Rotorcrew requires the consent of its Clients by disclosing in advance the purposes for which such data is collected and will be processed.

Rotorcrew undertakes that, prior to processing personal data held for purposes that are incompatible with those for which they were originally collected, it will seek a distinct consent and inform its Clients and will inform them of the significance and the envisaged consequences of such processing for the data subject.

7. Means of Collection

Personal data may be collected from Rotorcrew's Client or from a third party, directly from them, via email, through the customer account or newsletter program registration forms, through phone conversations, surveys, social media communications or texts messages.

Rotorcrew collects personal data from its Clients with their prior consent and provides the following information, notably at the stage of collection and subsequently on request, in simple and clear terms:

- The name of Rotorcrew;
- The purposes for which the data is collected;
- The means by which the data is collected;
- The rights of access and rectification provided by law;
- The right to object to the processing or transfer of the data collected;
- The name of the third party for whom the data is collected, if appropriate;
- The name of any third parties to whom it may be necessary to transfer personal data;
- The possibility that personal data may be transferred to third countries or international organisations.

Upon request, Rotorcrew will inform its Clients of their personal data collected, the categories of persons who have access to such data, the duration of storage of such data, and the contact details of the data controller.

8. Purposes of Personal Data Processing

Rotorcrew collects, processes and stores the personal data of its Clients in order to:

- Verify their identity;
- Communicate with them;
- Generate invoices, statements of account and statements at the request of its Clients;
- Manage the different service packages;
- Manage the various accounts receivable;
- Share personal information with third parties for storage purposes;
- Compile statistical data;
- Maintain a Client's history of the website so that their file is up-to date and accurate;
- Improve, personalize and develop its website;
- Develop new products and services;
- Provide customer service on its website;
- Provide updates and other information in connection with its website;
- Marketing and promotion;
- Any other compatible purpose;
- Perform profiling;
- As permitted or required, for any applicable legal or regulatory obligation or provision;



- Enforce its rights, when applicable.

Rotorcrew processes the data collected and stored solely for the purposes for which consent was obtained. Thus, except with distinct consent, Rotorcrew does not transfer, share or communicate to third parties any personal data.

This data is accessible only to Rotorcrew's employees and service providers who necessarily need it to perform their functions and are required to respect the privacy of such data.

9. Records of Processing Activities

Rotorcrew maintains a register of all personal data processing activities, i.e. an inventory and analysis of personal data regarding the purposes for which they are processed.

Rotorcrew allows access to its register to the European Data Protection Supervisor and provides them with a copy upon request.

10. Storage and Security of Personal Data

Any personal data collected, regardless of the format in which it is stored, is kept in a secure environment to prevent unauthorized access, transfer, reproduction, processing or alteration, as well as loss or theft. These security measures include, where applicable, the use of firewalls and secure servers, encryption, the deployment of appropriate access rights management systems and procedures, and other measures necessary to ensure appropriate protection of personal data against unauthorized processing or transfer. Rotorcrew uses information technology to assist its Services operations in order to provide better service and adequate protection for the data it stores.

Rotorcrew takes appropriate security measures and access management measures to ensure the privacy, integrity and availability of personal data collected, processed, communicated, transferred, and stored or deleted, and which are reasonable with respect to their sensitivity, the purpose of their processing, their quantity, and their format.

11. Transfer of Personal Data to Third Parties

Rotorcrew requires the consent of its Clients before transferring their personal data to a third party, unless authorized by the law.

Rotorcrew may, as part of the services offered, transfer personal data to its external suppliers located in third countries, in compliance with applicable legal requirements. Such information may be subject to the laws of the countries to which it is transferred. When Rotorcrew transfers personal data to third countries, it takes the necessary measures to protect them.

When such data is transferred outside Europe and outside the Province of Quebec, Rotorcrew carries out a data protection impact assessment. In doing so, Rotorcrew considers the sensitivity of the personal data, as well as the nature, scope, context and purposes of the envisaged processing. The transfer of such data is carried out outside Europe when appropriate safeguards



are provided for the intended purpose, such as standard clauses for the protection of personal data approved by the European Commission as advised by the European Data Protection Committee, unless it has been determined by those entities that this country offers an adequate level of protection. The transfer of such data is carried out outside the Province of Quebec when appropriate safeguards are provided by contract for the intended purpose.

12. Categories of Recipients of Personal Data Transfer

These recipients include Stripe, which optimizes the operation of customer accounts on the website, SendGrid, which enables the sending of transactional emails, Mailchimp, which offers automated marketing services, Heroku, which stores computer servers for Rotorcrew, and Shopify, which administers payments. In such cases, Rotorcrew's external service providers are subject to confidentiality agreements and legal restrictions prohibiting the processing of transferred personal data for purposes other than those for which it was collected by Rotorcrew. Rotorcrew may also enter into service agreements with its external suppliers, in compliance with the law, in order to facilitate the transfer of personal data between them and with other parties.

Moreover, Rotorcrew and its service providers may be required to communicate stored personal data in response to court orders, administrative inquiries or as otherwise required by law.

In the event of a merger, acquisition or restructuring of Rotorcrew's Services, Rotorcrew may be required to transfer personal data to potential or existing acquirers and their advisors for the purposes of the transaction. Rotorcrew will ensure that it complies with the requirements of relevant laws prior to any such communication.

13. Right to Access and Right to Portability

Upon request, any Client has the right to access any of their personal data collected by Rotorcrew in a structured, commonly used and machine-readable format, and has the right to request its transfer to a third party, under certain circumstances, unless limited by the law. Such requests can be submitted to the data controller.

14. Right to Rectification and Right to Erasure

Upon request, any Clients has the right to request that their personal data be corrected, rectified or erased.

15. Right to Restriction of Processing

Upon request, any Client has the right to oppose the processing of their personal data by contacting the data controller. Such withdrawal of consent will be effective for the future only, upon receipt by Rotorcrew. On receipt of such notice, Rotorcrew undertakes to cease all processing of the personal data in question and to proceed with their erasure, unless required not to do so by the law.

Rotorcrew undertakes to inform any third party to whom such personal data may have been transferred in compliance with the consent obtained, so that they may also proceed to the cessation of the processing and erasure of the personal data, if applicable.

However, Rotorcrew may not be able to meet its obligations in the event of a request for withdrawal of consent or early erasure. In which case, Rotorcrew cannot be held responsible for any damages that may occur to the Client.

16. Duration of the Storage of Personal Data

Personal data is stored for the limited period necessary to fulfill the purposes for which it was collected and is subsequently erased. Personal data may be stored for a longer period, provided that another retention period is prescribed by law applies. It is otherwise erased in compliance with the law or, when appropriate, otherwise processed so that it can no longer be attributed to the person concerned, such as pseudonymization when the data originates from Quebec or anonymization when the data originates from Europe.

17. Responsibility of the Client

Any Client communicating data to Rotorcrew is responsible for its accuracy. They must ensure that the system or equipment used to communicate or receive data from Rotorcrew is appropriately secure. Rotorcrew cannot be held responsible for unauthorized access to data resulting from negligence or vulnerabilities in a Client's equipment or system.

In the event that the privacy of the Client's data is compromised, or the Client's identity is infringed, the Client is required to communicate with Rotorcrew as soon as possible by contacting Rotorcrew's data controller.

18. Confidentiality Incidents Protocol

A confidentiality incident involves unauthorized access, processing, transfer, loss or any other infringement of the protection of personal data. In the event of a confidentiality incident, Rotorcrew undertakes to take prompt action to mitigate the risk of damage to the data subject and to prevent further incidents of a similar nature. In the event of a serious threat to the data subject, Rotorcrew informs the data subject as well as the *Commission d'accès à l'information* or the European Data Protection Supervisor, as appropriate.

19. Record of Confidentiality Incidents



Rotorcrew maintains a record of all confidentiality incidents to which it may have been exposed, including those that do not present a serious threat of harm to the data subject.

Rotorcrew allows the *Commission d'accès à l'information* and the European Data Protection Supervisor, if appropriate, to consult this register, and may provide them with a copy upon request.

20. Cookies and Privacy Settings

In order to offer its Services, Rotorcrew, through its website, may also collect personal data using the following technologies:

- **Cookies:** When a Client accesses Rotorcrew's website, it sends one or more cookies to the Client's computer, as well as cookies from related services such as Shopify, LinkedIn, Google Analytics, Google Adwords, Google Adsense or Meta. These cookies contain identifiable data that allows Rotorcrew to know how Clients interact with the services, to target Clients with relevant offers, their browsing history on the site, and to compile a summary of their experience using the services.
- **Connection logs:** Whenever a Client uses Rotorcrew's Services through its website, the servers automatically record the login information sent by the Client's browser when connecting to a website. These server logs may record information such as the Client's Internet search, IP address, browser type and language, Internet service provider, date and time of connection, pages visited, one or more cookies used to identify the Client's browser and number of clicks.

To the appropriate extent, data provided by a Client during its processing may be combined with data from other Rotorcrew's Services or third parties, such as Shopify, LinkedIn, Google Analytics, Google Adwords, Google Adsense or Meta, to improve the quality of the Services. In some cases, the Client may opt to authorize or refuse such processing of their data.

If a Client wishes to disable Google Analytics, Google Adwords, Google Adsense or Facebook advertising features, including through ad settings, mobile application ad settings or any other available means, they may visit the Google Analytics Internet deactivation add-on. The user may also consult one of the following websites to find out more about the use of third party cookies and how to opt out of their application: Google Advertising and Privacy, Google Ad Settings and ACD Page and Shopify.

A consent banner is automatically displayed upon entering the website allowing the Client to activate cookies. The performance of certain Services offered by the website may be compromised if the Client refuses to activate the cookies. The cookies in question fall into four (4) distinct categories:

- Necessary cookies needed to guarantee website functionality;
- Preference cookies to navigate on the website;
- Statistics cookies for analytical purposes;



- Marketing cookies or targeting the user with personalized ads.

Any Client providing personal data in compliance with this section of the Privacy Policy consents to its processing and transfer for the purposes for which the data was collected.

21. Third Party's Websites and Links

Some of Rotorcrew's Services may be offered in conjunction with other websites. The personal data that a Client provides to these sites may be sent to Rotorcrew so that the Service can be carried out. This personal data is processed in compliance with this Privacy Policy. Affiliated sites may have varying privacy policies and practices, so Rotorcrew advises Clients to review their privacy policies and practices.

Rotorcrew may provide links in a format that enables it to determine whether those links have been followed. This data is used to improve the quality of personalized content and ads.

22. Complaints Management

Any Client seeking to submit a complaint regarding Rotorcrew's data collection, storage, processing, transfer, erasure or regarding their rights of access or opposition to their personal data is required to submit the complaint to Rotorcrew's data controller. The data controller shall analyse the complaint and provide a response within 30 days of receipt of the complaint.

23. Data Controller

Mr. Martin Noel Rotorcrew's employee and CEO, is Rotorcrew's data controller. Mr. Martin Noel can be reached at the following address Martin.noel@heli-boreal.ca and by phone at 418-961-8484

Effective Date

This Privacy Policy enters into effect the May 2024.