

Privacy Policy

1. Introduction and Scope

Public Image Management (“**We**” or “**US**”) is committed to the protection of privacy and information security.

This Privacy Policy (the “**Policy**”) addresses the protection of Personal Information (hereafter defined) we collect on the users of the website <https://publicimagemgmt.com/> (the “**Website**”) as well as on the persons who communicate with us using emails (“**you**”).

If you are a model, the protection of your Personal Information is subject to our Personal Management Agreement and, thus, is out of the scope of this Policy.

This Policy aims to comply with Canadian and Quebec laws relating to the protection of Personal Information and, where applicable, the *General Data Protection Regulation* (“**GDPR**”).

2. What do we collect, how and why

Personal Information means any information pertaining to a natural person which directly or indirectly allows the person to be identified. For the purposes of this Policy, Personal Information corresponds to “personal data” within the meaning of the GDPR.

We collect only the Personal Information that is necessary to establish, manage and maintain our business relationship with you.

To process your application to become a model, we collect, using email communications, the following information:

- Last name, First name;
- Email address;
- Pictures and other information that you send;

Please note that if you are not selected to be a model, the Personal Information you have provided will be destroyed in accordance with section 6. If you are selected, you will have

to sign a form regarding the use and communication of your Personal Information and this Policy will no longer apply.

To facilitate the navigation on the Website we may collect information by using cookies. Kindly refer to section 8 for more details.

We only use your Personal Information for the purposes stated above except where we are permitted by law, in very limited circumstances, to do so without your consent.

3. Your Consent

BY VISITING, USING THE WEBSITE OR OTHERWISE COMMUNICATING WITH US, YOU AGREE TO BE BOUND BY THIS POLICY AND CONSENT TO THE COLLECTION, USE, RETENTION, DISCLOSURE AND DESTRUCTION OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE TERMS DESCRIBED HEREIN. IF OTHER TERMS APPLY, WE WILL DESCRIBE THEM AT THE TIME OF COLLECTION.

If you do not want your Personal Information to be collected, used or disclosed in this manner, then please: refrain from providing us with Personal Information or exercise the opt-out option described below or offered at the time of collection.

YOU UNDERSTAND THAT CERTAIN FEATURES OF OUR WEBSITE MAY NO LONGER BE ACCESSIBLE OR MAY BE RESTRICTED FOLLOWING YOUR REFUSAL TO PROVIDE THE REQUIRED INFORMATION OR THE WITHDRAWAL OF YOUR CONSENT.

4. Security and Governance

Information security is a priority for us. Our internal policies provide for the following:

- The framework applicable to the use, communication, retention and destruction of such information;
- The roles and responsibilities of our employees throughout the life cycle of the information;
- A process for handling complaints concerning the protection of the information.

Each of employee who uses Personal Information is bound by confidentiality obligations and has received appropriate training. In addition, the employee may only access Personal Information that is necessary for the performance of his or her duties. In the event of a breach, our governance policies and practices provide for sanctions.

5. Disclosure of Your Personal Information

We may disclose Personal Information to third parties with your consent or in specific circumstances permitted by law. The following table summarizes these circumstances and the steps we take to protect such information.

Recipient	Description and purpose	Steps
<p>Service providers, agents, subcontractors</p> <p>(“Subcontractors”)</p>	<p>We may enter into contracts with Subcontractors to provide a service to our clients, such as a Website feature.</p>	<p>The contract requires Subcontractors to:</p> <ul style="list-style-type: none"> • Use only Personal Information that is necessary for providing the service. • Refrain from disclosing or communicating Personal Information without our authorization. • Implement rigorous security measures. • Allow us to audit these measures. • Notify us immediately of a confidentiality incident. • Destroy Personal Information at the end of the contract.
<p>Another party in a Business Transaction</p>	<p>We may enter into a contract with a third party to conclude a Business Transaction. Such a transaction is defined as the disposition or lease of all or part of our business or its assets, a change in our legal structure by merger or otherwise, the obtaining of a loan or other form of financing or a security interest taken to secure any of our obligations (“Business Transaction”).</p>	<p>The contract requires the other party to:</p> <ul style="list-style-type: none"> • Use Personal Information only for the purposes of entering into the Business Transaction. • Implement rigorous security measures. • Refrain from disclosing or communicating Personal Information without our consent. • Notify us immediately of a confidentiality incident. • Destroy Personal Information if the Business Transaction is not entered into or the Personal Information is no longer necessary for entering into the Business Transaction.

Legitimate authorities	In order to comply with a court order or decision, including a valid search warrant, or an order or decision of a regulatory authority, we may be required to provide Personal Information.	<p>These authorities are required by their governing laws to establish measures to respect and preserve the confidentiality of your Personal Information.</p> <p>We inform Customers of any requests from legitimate authorities to access Personal Information about their Authorized Users. We decline to provide access where the request is not legally binding.</p>
Our legal counsel	In order to defend or enforce our rights, we may, in certain circumstances, disclose your Personal Information.	Both the law and the retainer agreements we sign require our lawyers to protect the confidentiality of all our communications with them.

6. Retention

We retain Personal Information about you only as long as necessary to fulfill the purpose for which it was collected, to comply with legal retention requirements, and as long as necessary to protect our legitimate business interests. For instance, if you are not selected to become a model, we destroy the pictures you have sent.

We reserve the right to establish Personal Information destruction policies from time to time. If you request the destruction of your Personal Information, we will use reasonable efforts to comply with your request unless we are allowed or required by the law to keep it.

7. Your Rights

You have the following rights:

- The right to be informed of the types of operations carried out on your Personal Information, including its use and disclosure (Processing as defined in the GDPR).
- The right to change or withdraw your consent to the collection, use and disclosure of your Personal Information.
- The right to access your Personal Information.

- The right to have your Personal Information corrected if it is inaccurate or misleading and to have it completed if it is incomplete.
- The right to obtain your Personal Information in a commonly used digital form.
- The right to be informed of a confidentiality incident involving your Personal Information that may cause you serious harm.

You may exercise these rights, at any time by sending written notice to the Privacy Officer whose contact information can be found at the end of this document.

We will respond to any request within 30 days of receipt, except where the law permits an extension of that period. If we refuse to provide or correct the information, we will provide you with the reasons for the refusal, the applicable sections of the law and information about your remedies, all subject to the limitations of the law.

If we refuse to rectify your Personal Information, we will allow you to place comments in your file in respect of the Personal Information for which rectification has been refused. We will also retain the Personal Information that has been the subject of an access request for as long as necessary to allow you to exhaust any recourse provided by law.

8. Cookies

- **Definition**

A cookie is a small text sent by a server to your browser, which it will send back the next time it connects to servers sharing the same domain name.

When you visit the Website for the first time, a pop-up window will allow you to accept or reject certain categories of cookies.

If you wish, you can set your browser to notify you when you receive cookies or to refuse them. You do not need to accept the non-essential cookies to visit our Website. However, if you refuse them, you could be unable to use some of its features.

- **Types of cookies**

Technical cookies: Technical cookies are used throughout the browsing experience to facilitate the use of the Website. For example: a technical cookie may be used to remember your username to facilitate your login, to remember your preferences or options you have chosen.

Analytical cookies: These cookies are anonymous and are used to collect statistics on the use of the Applications.

Advertising cookies: These cookies may be added by the Website or by other sites serving advertisements. These cookies collect information anonymously and build up your visitor profile.

9. Privacy Officer

If you have any questions or requests regarding the Policy, you can send an e-mail to our Privacy Officer using the following address: legal@publicimagemgmt.com

10. Changes

We reserve the right to change the content of this Policy at any time. Any changes will be posted on our Website and brought to your attention when you log in. We recommend that you print a copy of this Policy for your records and review this section of our Website periodically.