

# COMPLAINTS HANDLING POLICY

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## Objective

The purpose of this policy is to define the applicable procedure for handling complaints relating to the protection of and access to personal information.

## Scope of application

This policy addresses complaints to Novo regarding the protection of, and access to, personal information held directly or indirectly by Novo through a consultant, subcontractor, or service provider.

## Policy

### Receiving a complaint

An individual may file a complaint if he or she believes that Novo is not complying with its privacy obligations with respect to his or her personal information. A complaint may relate to the collection, retention, use, disclosure, access, destruction, or anonymization of personal information.

Any complaint covered by this policy must be sent, in writing, to the person responsible for the protection of personal information at Novo :

#### **For: Groupe Conseil Novo SST**

Me Éric Latulippe  
1020 rue Bouvier, Suite 600  
Québec (QC) G2K 0K9  
418 647-5408  
[eric.latulippe@novosst.com](mailto:eric.latulippe@novosst.com)

#### **For : Novo Avocats**

Me Éric Latulippe  
1020 Rue Bouvier, Suite 570  
Québec (QC) G2K 0K9  
418 647-5408  
[eric.latulippe@novoavocats.com](mailto:eric.latulippe@novoavocats.com)

Except in the case of anonymous complaints, Novo will acknowledge reception of the complaint within five (5) business days.

### Admissibility of complaints

Within 20 working days of receiving the complaint, Novo will confirm whether or not it is admissible. To be admissible, the complaint must relate to the provisions of the *Act respecting the protection of personal information in the private sector* and must contain all the information required to process it.

### Handling complaints

If the complaint is deemed admissible, Novo will determine whether any breaches have occurred and will inform the complainant of its findings within 60 working days of receiving the complaint. If the complaint is found to be justified, Novo will inform the complainant of the measures put in place to correct the situation. The person responsible for the protection of personal information will follow up on the measures announced.

If the 60 working days are insufficient to complete the analysis of the complaint, Novo will inform the complainant of the required additional time.