

 CESARONI TECHNOLOGY INCORPORATED	Privacy Policy	
	Process Owner: Gordon Clarke	Version 2.00
Document #: CTI-ADM-POL-002	Status: Issued	Last Amended: 2026-08-24
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1. Purpose and Scope

Cesaroni Technology Inc. (“CTI,” “we,” “us,” or “our”) is committed to protecting the privacy and confidentiality of personal information entrusted to us. This Privacy Policy explains how CTI collects, uses, discloses, retains, safeguards, and otherwise handles personal information in connection with our commercial activities.

CTI's privacy practices are designed to comply with applicable Canadian privacy legislation, including the **Personal Information Protection and Electronic Documents Act (“PIPEDA”)**, where applicable.

This Privacy Policy applies to personal information collected by CTI in connection with our commercial activities, including information relating to customers, prospective customers, suppliers, contractors, consultants, visitors, job applicants, and other individuals who interact with CTI.

Certain personal information may also be subject to additional legal, regulatory, contractual, security, or employment requirements. Where another applicable law imposes additional requirements, CTI will comply with those requirements.

2. What Is Personal Information?

For purposes of this Policy, “personal information” generally means information about an identifiable individual.

Depending on the circumstances, personal information may include an individual's name, contact information, identification information, employment or education information, information provided in connection with an application for employment, and information collected for security or access-control purposes.

Business contact information used solely to communicate with an individual in relation to their employment, business, or professional capacity may be subject to different treatment under applicable law.

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3. Accountability and Privacy Officer

CTI is accountable for personal information under its control.

CTI has designated a **Company Privacy Officer (“Privacy Officer”)** who is responsible for overseeing CTI's privacy compliance program and responding to privacy-related inquiries and requests.

The Privacy Officer's responsibilities include:

- overseeing CTI's privacy policies and procedures;
- responding to requests for access to and correction of personal information;
- responding to privacy complaints and inquiries;
- coordinating the investigation and response to privacy incidents;
- providing privacy guidance and training as appropriate;
- overseeing the handling of personal information by service providers; and
- reviewing CTI's privacy practices periodically and recommending updates where appropriate.

The Privacy Officer may be contacted at:

Privacy Officer

Cesaroni Technology Inc.
PO Box, 246
Gormley, Ontario, L0H 1G0

Email: regulatory@cesaroni.net

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4. Personal Information CTI May Collect

The information CTI collects depends on the nature of the individual's relationship with CTI and the purposes for which the information is required.

Depending on the circumstances, CTI may collect:

Customers, suppliers, contractors, and other business contacts

- name and business contact information;
- job title and organization;
- business address;
- telephone number and email address;
- information relating to contracts, transactions, orders, and accounts;
- correspondence and communications with CTI;
- information necessary to provide products or services; and
- information necessary to comply with contractual, legal, regulatory, security, or export-control requirements.

Job applicants and prospective personnel

- name and contact information;
- résumé and employment history;
- education, qualifications, skills, and professional credentials;
- references and information obtained during the recruitment process;
- information necessary to determine eligibility for employment;
- information required for security screening or facility access; and
- other information reasonably necessary for recruitment and employment purposes.

Employees and other personnel

Depending on the applicable legal requirements and the individual's relationship with CTI, CTI may collect information necessary for employment, compensation, benefits, workplace administration, security, health and safety, access control, training, performance management, and other legitimate organizational purposes.

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Visitors and facility access

CTI may collect information necessary to identify and manage visitors and control access to its facilities, including:

- name and organization;
- contact information;
- identification information where required;
- visit dates and times;
- host or person being visited;
- access or security information; and
- information required for Controlled Goods or other security requirements.

Website and electronic communications

When individuals interact with CTI electronically, CTI may collect information such as:

- information submitted through website forms;
- email addresses and correspondence;
- IP addresses and technical information;
- browser or device information;
- information concerning website usage; and
- information contained in communications with CTI.

CTI will not collect personal information through its website for purposes unrelated to the purposes identified in this Policy or otherwise communicated at the time of collection, except where permitted or required by law.

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5. Purposes for Collecting Personal Information

CTI collects personal information only for purposes that are reasonable and appropriate in the circumstances.

Depending on the individual's relationship with CTI, purposes may include:

- providing products and services;
- communicating with customers, suppliers, contractors, and other business contacts;
- establishing and managing business relationships;
- processing transactions, payments, orders, and accounts;
- responding to inquiries and requests;
- recruiting and evaluating prospective personnel;
- administering employment and workplace matters;
- maintaining workplace, facility, and information security;
- controlling access to CTI facilities, systems, technology, and information;
- conducting security assessments;
- complying with the Controlled Goods Program and other applicable regulatory or security requirements;
- complying with legal, regulatory, contractual, accounting, tax, insurance, and audit requirements;
- investigating and preventing fraud, security incidents, misconduct, or unauthorized activity;
- protecting CTI's legal rights and interests;
- administering and improving CTI's websites, systems, products, and services; and
- other purposes identified at or before the time information is collected or otherwise permitted or required by law.

Where CTI intends to use personal information for a new purpose that is not reasonably compatible with the original purpose, CTI will obtain consent where required by applicable law.

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6. Controlled Goods and Security Assessments

CTI may be required to collect and maintain personal information in connection with Canada's **Controlled Goods Program**, including security assessments of individuals who examine, possess, or transfer controlled goods or technology. Where applicable, information collected for this purpose may include information required by the Controlled Goods Program, such as identity, citizenship or residency information, employment information, security-assessment information, and criminal-record information or other supporting documentation required by the applicable program requirements.

CTI may use and disclose this information as necessary to conduct security assessments, determine authorization to access controlled goods or technology, administer CTI's security program, comply with the **Defence Production Act**, the **Controlled Goods Regulations**, and related government requirements, and fulfill CTI's obligations to the Controlled Goods Program.

CTI will retain Controlled Goods security-assessment records for the periods required by applicable law. For example, current Controlled Goods Program requirements generally require the most recent security-assessment records and supporting documentation to be retained for two years after the individual ceases to act in the relevant capacity.

Where required, CTI may also provide information to the Controlled Goods Program or other government authorities in accordance with applicable law.

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7. Consent

CTI will obtain meaningful consent for the collection, use, or disclosure of personal information where consent is required by applicable privacy law.

Depending on the circumstances, consent may be express or implied where permitted by law. CTI will generally seek express consent when personal information is sensitive or when the purpose of the collection, use, or disclosure would not reasonably be expected by the individual.

Consent may not be required where collection, use, or disclosure is authorized or required by law or where another applicable legal exception applies.

An individual may withdraw consent to the future collection, use, or disclosure of their personal information, subject to legal or contractual restrictions and reasonable notice. Withdrawal of consent may affect CTI's ability to provide certain products, services, employment opportunities, access, or other benefits where the information is reasonably necessary for those purposes.

Where consent is required and an individual refuses or withdraws consent, CTI will explain the reasonably foreseeable consequences where appropriate.

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8. Limiting Collection

CTI will limit the collection of personal information to information that is reasonably necessary for the identified purposes.

CTI will generally collect personal information directly from the individual.

However, CTI may collect information from other sources where:

- the individual has provided consent;
- the collection is authorized or required by law;
- the information is publicly available as permitted by applicable law;
- collection from another source is necessary for a legitimate purpose and is permitted by applicable law; or
- the information is required as part of a security, employment, contractual, regulatory, or other process where such collection is permitted.

CTI will not collect personal information indiscriminately.

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9. Use and Disclosure of Personal Information

CTI will use personal information only for the purposes for which it was collected, for purposes that are reasonably compatible with those purposes, or as otherwise permitted or required by law.

CTI does not sell personal information.

CTI may disclose personal information where reasonably necessary for the purposes described in this Policy, including to:

- CTI employees and representatives who require the information to perform their duties;
- contractors, consultants, and service providers acting on CTI's behalf;
- professional advisers, including legal, accounting, insurance, and financial advisers;
- background-check, security-screening, or related service providers;
- customers, suppliers, or other business partners where necessary to fulfill a legitimate business purpose;
- government departments, agencies, regulators, or law-enforcement authorities where permitted or required by law;
- the Controlled Goods Program or other government security programs where required;
- courts, tribunals, or other authorities pursuant to legal process;
- parties involved in an actual or proposed corporate transaction, subject to applicable legal requirements; and
- other parties with the individual's consent or as otherwise permitted or required by law.

CTI will take reasonable steps to ensure that third parties receiving personal information on CTI's behalf use and protect that information only for authorized purposes.

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10. Service Providers and Processing Outside Canada

CTI may engage third-party service providers to perform services on its behalf, including information technology, cloud hosting, payroll, benefits administration, recruitment, security, accounting, legal, insurance, communications, and other services.

Some service providers may process or store personal information outside Ontario or outside Canada.

Where personal information is transferred to a service provider for processing, CTI remains accountable for the information and will take reasonable steps to ensure that appropriate contractual, organizational, and technical safeguards are in place.

Personal information processed outside Canada may be subject to the laws of the jurisdiction in which it is processed and may be accessible to courts, law enforcement, or national-security authorities in that jurisdiction.

CTI will provide additional information about specific cross-border processing where required by applicable law.

11. Accuracy

CTI will make reasonable efforts to ensure that personal information in its custody or control is sufficiently accurate, complete, and up to date for the purposes for which it is used.

Individuals are encouraged to notify CTI of changes to their personal information or to identify information they believe is inaccurate or incomplete.

Requests to correct personal information may be submitted to the Privacy Officer using the contact information in Section 18.

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12. Retention and Secure Destruction

CTI will retain personal information only for as long as reasonably necessary to fulfill the purposes for which it was collected, to establish or maintain business relationships, to comply with legal, regulatory, contractual, accounting, security, or insurance requirements, or to resolve disputes and enforce agreements. Different categories of personal information may therefore be retained for different periods.

CTI maintains retention and destruction practices designed to ensure that personal information is securely destroyed, erased, or anonymized when it is no longer required, subject to applicable legal and regulatory retention requirements. For example, records relating to Controlled Goods security assessments will be retained for the periods required by the Controlled Goods Program rather than being subject to a general one-year résumé-retention rule.

CTI may retain certain information beyond ordinary business retention periods where necessary to comply with legal obligations, preserve evidence, resolve disputes, investigate incidents, or establish, exercise, or defend legal claims.

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13. Safeguards

CTI uses physical, organizational, and technological safeguards appropriate to the sensitivity of personal information and the purposes for which it is used.

Depending on the circumstances, safeguards may include:

- physical access controls;
- restricted access to personal information on a need-to-know basis;
- user authentication and access controls;
- confidentiality obligations;
- employee privacy and security training;
- secure information systems;
- encryption or other technical protections where appropriate;
- security monitoring and incident-response procedures;
- secure disposal of paper and electronic records;
- contractual requirements for service providers; and
- periodic review of privacy and security practices.

No method of transmission or electronic storage can be guaranteed to be completely secure. CTI nevertheless maintains safeguards designed to reduce the risk of unauthorized access, collection, use, disclosure, copying, modification, loss, or theft.

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14. Privacy Breaches and Security Incidents

CTI maintains procedures for responding to suspected or actual privacy breaches and other security incidents involving personal information.

Where a breach of security safeguards involving personal information occurs, CTI will assess the circumstances and take reasonable steps to contain the breach, reduce the risk of harm, investigate the incident, and implement corrective measures.

Where required by PIPEDA or another applicable law, CTI will:

- report the breach to the appropriate privacy regulator;
- notify affected individuals;
- notify other organizations or government institutions where appropriate to reduce the risk of harm; and
- maintain records of the breach as required by law.

CTI will determine whether notification or reporting is legally required based on the facts and circumstances of each incident.

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15. Individual Access to Personal Information

An individual may request access to personal information about them that is under CTI's custody or control, subject to applicable legal exceptions.

An access request should be made in writing to the Privacy Officer and should provide sufficient information to allow CTI to identify the individual and locate the relevant records.

Upon receiving a request, CTI may take reasonable steps to verify the identity of the requester before providing access to personal information.

Subject to applicable law, CTI will:

- acknowledge and respond to the request within the applicable statutory time period;
- provide access to responsive personal information;
- explain the reasons for any information that cannot be provided; and
- identify the applicable legal basis for refusing access where appropriate.

Under PIPEDA, the general response period for an access request is 30 days, subject to statutory extensions and other applicable provisions.

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16. Correction of Personal Information

An individual may request correction of personal information that they believe is inaccurate or incomplete.

If CTI agrees that information is inaccurate or incomplete, CTI will correct the information as appropriate.

Where appropriate, CTI will also communicate the correction to organizations or persons to whom the information was previously disclosed, subject to applicable legal requirements and practical considerations.

If CTI does not agree that a correction is warranted, the individual may request that a notation of the disagreement be attached to the relevant record where permitted by law.

17. Privacy Complaints

Individuals who have concerns about CTI's collection, use, disclosure, retention, or safeguarding of personal information are encouraged to contact the Privacy Officer.

CTI will:

1. acknowledge the complaint where appropriate;
2. investigate the matter;
3. review relevant records and practices;
4. communicate the outcome to the complainant; and
5. take corrective action where warranted.

CTI will handle privacy complaints as promptly as reasonably practicable. If an individual is not satisfied with CTI's response, they may have the right to bring the matter to the **Office of the Privacy Commissioner of Canada ("OPC")** or another privacy regulator having jurisdiction.

Information about the OPC is available at:

<https://www.priv.gc.ca/>

Nothing in this Policy limits an individual's right to contact a privacy regulator or exercise any other rights available under applicable law.

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18. Contacting CTI About Privacy

Questions, access requests, correction requests, consent withdrawals, and privacy complaints should be directed to:

Privacy Officer
Cesaroni Technology Inc.
 PO Box 246
 Gormley, ON L0H 1G0 Canada

Email: privacy@cesaroni.net

Individuals should clearly identify the nature of their request and provide sufficient information for CTI to respond.

For access requests, CTI may request additional information reasonably necessary to verify the requester's identity and locate the requested information.

19. Electronic Communications and Marketing

Where CTI sends commercial electronic messages, CTI will comply with applicable requirements, including Canada's **Anti-Spam Legislation (CASL)** where applicable.

Individuals may unsubscribe from commercial electronic messages in accordance with applicable law.

Unsubscribing from marketing communications does not necessarily prevent CTI from sending non-commercial or transactional communications that are necessary for an existing business relationship, contract, security requirement, or other lawful purpose.

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20. Changes to This Privacy Policy

CTI may update this Privacy Policy from time to time to reflect changes in its practices, technology, services, legal requirements, or regulatory expectations.

The current version will be made available through CTI's website or by request to the Privacy Officer.

Where required by applicable law, CTI will provide additional notice or obtain consent before making material changes to how personal information is collected, used, or disclosed.