

# Modalis Privacy Policy

*This policy applies to all activities and outputs associated with Modalis (Modalis Infrastructure Partners Inc.), airportQM (Modalis Quality Management Inc.), and its business intelligence website airportIR. These companies and services are referred thereafter as Modalis.*

**Validity:** 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021

## Purpose & Context

Modalis recognises its corporate responsibilities with regards to an individual's privacy and is committed to ensure that any of the private information that is collected or managed as part of our business is handled in full compliance of regulatory requirements.

The Modalis group of companies are incorporated in British Columbia, Canada, and as such are regulated with regards to privacy under the Personal Information Protection and Electronic Documents Act (PIPEDA). As such, Modalis is fully committed to follow each and every of the principles set-out by PIPEDA.

## Accountability

The Modalis Infrastructure Partners CEO, and airportQM Managing Director are accountable for the successful implementation of this policy within their respective organizations and undersign this policy.

## Identifying Purposes

Modalis is committed to be clear and open with our clients and associates with regards to the reason why personal data is being collected. We foresee that personal data will be collected in the form of contact details, Curriculum Vitae, professional experience and employment details towards the following purposes:

- Client contact during offer preparation or project delivery
- Associate participation in Modalis project proposals
- Associate experience details inclusion within promotional materials or websites
- Candidate search and selection on behalf of clients

## Consent

Modalis commits to gaining written and specific consent from individuals with regards to the obtention, use or disclosure of personal information.

## Limiting Collection

Modalis will only collect personal data for the purposes outlined above.

## Limiting Use, Disclosure and Retention

Modalis will limit the collection, use and retention of personal data to the specific use for which the data had been originally collected, and will destroy all personal once its purpose has expired. If personal data is to be used for a different purpose, Modalis will seek/secure further and specific written consent before its use.

## Accuracy

Modalis will ensure as far as possible that any personal information gathered is accurate and complete and is maintained as such during its use.

## Safeguards

Modalis will ensure that personal information is protected from unwanted access, including cyber-attack, as well as wrongful dissemination.

## Openness

Modalis is committed to full transparency with individuals with regards to their private information held by the company. The Modalis Privacy Policy is available within the Modalis organization as part of its documented information and is regularly shared and communicated to our Managing Partners and associates on first engagement, and at each regular update. The policy is also available to our customers as requested.

## Individual Access

Modalis will provide access to an individual's personal information, or will delete an individual's personal data, on request from the individual.

## Challenging Compliance

In the event where an individual wishes to complain about how Modalis may have obtained, used or handled his or her personal information, complaints can be submitted in writing to the accountable manager for the respective organization as outlined under the "Accountability" section above. Modalis will do its utmost to thoroughly review and address the complaint as far as possible.

## Further Jurisdiction

Modalis may collect, use and retain data in support of client organizations in countries of regions outside of Canada, and subject to different personal data privacy requirements.

In such event, Modalis is committed in ensuring that local data privacy regulations and requirements are fully met within the scope of the specific engagement under which they apply. As a minimum, Modalis will always meet the requirements of Canadian PIPEDA regulations.

## Policy Review

The Modalis Privacy Policy, as well as supporting processes and documentation, is reviewed on a yearly basis and updated as necessary.



Curtis Grad  
Modalis Infrastructure Partners CEO



Fernando Lopez-Calleja  
airportQM Managing Director