

Privacy Policy

Nova Bus Inc. and Nova Bus (US) Inc. ('Nova Bus', 'we', 'us' or 'our') are committed to protecting your privacy and maintaining the confidentiality of your Personal Information (as defined below), which is why we have implemented a personal information management program based on best practices and appointed a Privacy Officer. The purpose of this privacy policy (the 'Policy') is to inform you of how we collect, use, disclose, maintain, share and protect (collectively, the 'Processing') your Personal Information, as further described below. detail below.

ABOUT THIS POLICY

This Policy applies to any individual visiting or accessing the pages of Nova Bus's website (the 'Site').

In order to provide you with quality services, we need to have access to certain Personal Information (as defined below). We ensure that our employees and partners manage this information with all the necessary discretion and rigor, in compliance with the legal and regulatory requirements in force.

WHAT IS PERSONAL INFORMATION?

For the purposes of this Policy, "personal information" means any information about an identifiable individual which, taken separately or combined with other data, allows an individual to be identified. Generally, Personal Information does not include business contact information, such as your name, title, or work address or telephone number.

CONSENT

Nova Bus will obtain the necessary Personal Information directly from you, subject to the exceptions provided by law.

By visiting our Site and providing Personal Information to us through our Site, you consent to the Processing of your Personal Information in accordance with this Policy and our terms of use.

Nova Bus will not process Personal Information without your consent, unless authorized or required to do so under applicable laws and regulations. When required, Nova Bus may transmit your Personal Information to regulatory bodies with which it must collaborate, and which govern its activities. For example, Nova Bus may be required to communicate your personal information for the application of a law or for the detection and prevention of fraud and that your consent would harm one of these objectives.

Refusal of collection and withdrawal of your consent

Under applicable laws, you have the right, if you wish, to refuse the processing of your Personal Information. You may also, at any time, and subject to reasonable notice and applicable legal or contractual restrictions, withdraw your consent to the use of Personal Information in our possession by contacting our Privacy Officer. The refusal to communicate information or the withdrawal of your consent could prevent us from providing or continuing to provide you with certain of our products, the Personal Information potentially being necessary for the provision of these services.

Please note, however, that anonymized information, i.e., information that no longer identifies you, will be retained. You can contact Nova Bus as indicated in the section "How to contact us?" to resolve any issues.

WHAT PERSONAL INFORMATION DO WE COLLECT AND WHY DO WE COLLECT IT?

When the Personal Information that has been collected must be used for purposes not identified below, the new purpose will be identified and documented before the Processing, and Nova Bus will provide you, before this new Processing, with information on this other purpose and any other relevant information.

Depending on your activity on our Site, we may collect the following Personal Information:

When you complete our contact form

Nova Bus will ask you for your full name, email address and affiliation, if applicable to you, to contact you after you have completed the contact form on our Site. Nova Bus may also collect other Personal Information about you if you choose to share it with us through your email. Your privacy is important to us, so we recommend that you do not send us any other Personal Information through this contact form.

Information automatically collected when you visit our Site

When you visit our Site, we collect certain information related to your device, including, but not limited to, your device's IP address, date and time of access, URL of referring website, browser type and version as well as the operating system.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Directly from you when you visit our Site

In general, we collect Personal Information that we need directly from you, for example when you communicate with us and when you visit our Site.

With a legal basis such as your consent

The legal basis for Processing your Personal Information is generally that you have consented to it, unless otherwise required by applicable law (for example, to comply with our legal obligations, where necessary to establish, exercise or defend a claim for court, potential legal action, legal proceeding or potential legal proceeding).

WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

Nova Bus does not rent or sell any of your Personal Information to third parties and, at no time, will share it with third parties without your consent, unless required by law or as necessary for the purposes described hereinbelow.

For clarity, here are some examples of when it is necessary for us to share this information:

With our employees

In the course of their work, our employees may need access to your Personal Information, for example, when you contact us or request assistance from us. Their access is limited to what is necessary for the exercise of their functions.

With strategic partners

Nova Bus may share your Personal Information with its partners, such as affiliates, to the extent that such disclosure is required to accomplish the intended purposes. Nova Bus may also share your Personal Information with third parties to help us provide our services (maintenance, analysis, legal requirement, fraud detection and development). *When we use third parties to process any Personal Information, we implement reasonable contractual and technical safeguards, such as privacy impact assessments, to ensure that such third parties keep strictly confidential all Personal Information they treat.* Please note that these third parties may be located outside of your country or province of residence, in which case, review the "Where is your Personal Information stored and transferred?"

When required by applicable laws

Nova Bus may also share your Personal Information if required to do so by law or if we believe in good faith that such action is necessary to: (i) comply with the law; (ii) comply with the order of a competent judicial authority in any jurisdiction; (iii) comply with a legal process served on Nova Bus; (iv) protect and defend the rights or property of Nova Bus; (v) enforce or verify your compliance with any part of the agreements you have entered into with Nova Bus, as applicable; (vi) prevent fraud or other illegal activity perpetrated through the Service; or (vii) act in urgent circumstances to protect the personal safety of users of our Services or the general public.

During a business transfer

We may share your Personal Information without your consent when our business requires it (in the event of a merger, acquisition, bankruptcy or sale of assets, for example). In connection with this type of event, we may share some or all of your Personal Information with the relevant third party (or its advisers) as part of a due diligence process.

For other purposes with your consent

Where you have expressly consented, your Personal Information may be shared with other third parties. You also allow us to combine it with other reviews. There may also be specific instances where additional terms apply and, where applicable, we will clearly indicate whether specific third parties are processing your Personal Information.

Under no circumstances will we allow advertising to children where we actually know the user is under 14 years of age. To learn more about our advertising practices, please contact us as set forth in the "How to Contact Us" section.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

Nova Bus will only retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected, in accordance with our internal document retention policies, if necessary for the legitimate interests of Nova Bus, or to comply with legal requirements, applicable taxes or regulations. After this period, any Personal Information held by Nova Bus will be destroyed, deleted or made anonymous.

Strict procedures for storing your Personal Information are followed and we will eliminate Personal Information that is no longer required by Nova Bus for the identified purposes. If you wish to obtain more information on this subject, we invite you to contact us as indicated in the section "How to contact us? ".

The privacy of children

Our Site is intended for persons aged 14 or over. We do not knowingly process the Personal Information of minors. If you believe that we have collected Personal Information directly from minors, or if you are a parent or legal guardian and you believe that your minor child has provided us with Personal Information, you may contact us as described in the section "How to contact us? ".

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

Nova Bus has implemented security measures to protect your Personal Information. We strive to apply the necessary and appropriate security measures to ensure the confidentiality of the Personal Information in our possession. The standard security measures we use depend on the type of information collected. However, Nova Bus uses physical, electronic, and procedural safeguards in accordance with applicable regulations to protect your Personal Information.

These appropriate physical, technical and/or administrative safeguards and security measures have been implemented and are maintained to prevent:

Any accidental or unlawful destruction;
Any accidental loss;
Any unauthorized disclosure;
Any unauthorized modification;
Any unauthorized access; and
Any unlawful processing.

Nova Bus will make its employees aware of the importance of maintaining the confidentiality of Personal Information and precautions will be taken when disposing or destroying Personal Information in order to prevent unauthorized parties from gaining access to Personal Information. In addition, we make sure to restrict access to our offices and computer equipment, to train our employees and to require our agents and suppliers of goods and services having access to Personal Information to sign confidentiality agreements, and implement security measures deemed equivalent.

Please note, however, that no method of transmission over the Internet, or any method of electronic storage, is completely secure. We therefore encourage you to be careful when using the Internet. This includes not sharing your passwords. If you believe your Personal Information has been compromised, please contact us as set out in the “How to Contact Us” section.

WHERE IS YOUR PERSONAL INFORMATION STORED AND TRANSFERRED?

Your Personal Information may be stored by Nova Bus in places other than your province, territory, state or country of residence, including Canada (including the provinces of Quebec) the United States and the European Union. Nova Bus may also outsource Processing or share your Personal Information with third parties located elsewhere, including in locations other than your province, territory, state or country of residence. In this case, Nova Bus will ensure that your Personal Information is transferred to countries that have received an adequacy decision from the competent authority, or that your Personal Information is adequately protected by technical means, organizational, contractual or other appropriate legal means. If you wish to obtain more information on these security measures, please contact Nova Bus as indicated in the section “How to contact us?”.

WHAT ARE YOUR RIGHTS?

Depending on applicable laws, you may have the right to obtain access to your Personal Information, its rectification or erasure, the right to withdraw your consent (if applicable), the right to be informed of a decision based exclusively on automated processing (if applicable), the right not to be discriminated against, the right to restrict and oppose the use and Processing of your Personal Information by Nova Bus, or the right to the portability of data, namely to receive a copy of all the Personal Information that Nova Bus has about you in a structured, commonly used and machine-readable format.

To exercise any of these rights (to the extent they are available), please submit your request to us by writing to the Privacy Officer, as indicated in the “How to contact us” section. Depending on the right exercised, we will inform you of the procedure to follow, the processing time (response time) and the information required.

Personal Information Management Program

In order to protect your Personal Information, we have put in place policies, practices and procedures relating to the management of the Personal Information that we hold.

These internal policies and procedures govern the collection, use, disclosure, retention and destruction of Personal Information as well as the handling of complaints, information security and data governance. They also provide the framework for the implementation of privacy impact

assessments and for the prevention and potential response to privacy incidents. All such policies and practices have been approved by our Privacy Officer.

The collection of your Personal Information through our application complies with the requirements of this program.

RESPONSIBLE FOR THE PROTECTION OF PERSONAL INFORMATION

The Data Privacy Officer is responsible for the internal management and oversight of Nova Bus's privacy program.

The Data Privacy Officer is responsible for approving and implementing privacy policies and procedures, ensuring their proper functioning, and reporting to Nova Bus management on the effectiveness from the program.

It is also responsible for providing you with the necessary support in the event of a question, complaint or request relating to the protection of Personal Information.

HOW TO CONTACT US?

For any information request, please contact the office of Nova Bus's Data Privacy Officer, for access to documents and the protection of personal information, using the following email address: dataprivacy_novabus@volvo.com.

You can also send your request by mail to the following address:

C/O: Data Privacy Officer
1000 boul. Industriel, St-Eustache, QC, J7R 5A5

Nova Bus wishes for you to know that we are committed to responding quickly and accurately to all your questions and concerns regarding the confidentiality and security of your Personal Information and our policies and procedures in this regard.

If you have a complaint regarding the exercise of your rights under this Policy, your file will be handled by the office of Nova Bus's Data Privacy Officer, who will inform you of the procedures to follow. Each complaint will be investigated. If the complaint is justified, the specific situation will be corrected, and you will be informed.

CHANGES TO THIS PRIVACY POLICY

Nova Bus may frequently review this Policy to keep it up to date with applicable legislation and its operations. If material changes are made to the Policy, update notices (such as online notices or emails) may be used to notify you of such changes. Otherwise, posting of the revised Policy on the Site will be considered sufficient notice and, by continuing to use the Site or submitting Personal Information to us, you agree to the changes to our Policy.

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Summary of Governance Rules

In accordance with the Act Respecting the Protection of Personal Information in the Private Sector, Nova Bus has established and implemented policies and practices to govern its handling of personal information and to ensure the protection of such information. These include rules governing the retention and destruction of personal information, the roles and responsibilities of Nova Bus personnel throughout the life cycle of such information, and a process for handling complaints related to the protection of such information.

A. Retention and Destruction of Personal Information

Nova Bus is responsible for implementing processes to ensure that personal information is retained no longer than is permitted under this and any other applicable directives. Once the applicable retention period has expired, all such personal information must be destroyed or anonymized.

B. Roles and Responsibilities of Our Personnel throughout the Information Life Cycle

Personal information may only be processed if the person concerned has given their consent to the processing of their personal information for one or more specific purposes, unless an exception is provided for by law.

Regardless of whether the person concerned has given their consent to the processing, personal information may only be collected or processed for specified, explicit and legitimate purposes. The collected information must:

- (i) have a legitimate business purpose and do not infringe any law,
- (ii) be proportionate and necessary to achieve the stated objectives,
- (iii) do not unjustifiably adversely affect the persons concerned,
- (iv) be processed only in the way that the person concerned would reasonably expect.

Any processing of personal information shall be necessary to achieve the purposes for which it was collected, and the persons concerned shall not be deceived or misled as to the purposes or extent of the processing of their personal information. Personal information must be processed exclusively for the intended purposes communicated to the person concerned.

C. Process for Handling Complaints Related to the Protection of Personal Information

A person concerned has the right to request access to, erasure, rectification and limitation of their personal information, as well as to object to its processing and portability. The request process to exercise the concerned person's rights defines the roles and responsibilities, requirements and working methods to manage the concerned person's requests in accordance with legal requirements.