

CMP will obtain the informed consent of its customers, suppliers, employees and any other individuals from whom it may collect personal information, to its collection, use or disclosure of their personal information, unless collection, use or disclosure without consent is permitted or required by law.

“Informed consent” means that CMP will:

- Inform these individuals of the purposes for its collection, use and disclosure of their personal information, and
- Obtain their consent to collection, use and disclosure for these purposes, prior to, or at the time of, the collection of their information.

CMP will only collect, use and disclose the information necessary for its identified purposes.

If CMP wishes to collect, use or disclose an individual’s personal information for a new purpose, CMP will inform the individual of this new purpose and obtain his/her consent to this, except where such collection, use or disclosure without consent is permitted or required by law.

4.1 Customers, Suppliers and Other Individuals

CMP may collect, use and disclose personal information in respect of customers, suppliers, and other individuals who are not employees, from and to the persons and for the purposes set out below:

- (a) For the purpose of providing storage services and satisfying contractual obligations in respect of those services;

- (b) To banks, trust companies, credit unions and credit card companies for the purposes of authenticating account information and processing pre-authorized payments;
- (c) From and to collection agencies for the purposes of skip tracing and administering debt collection;
- (d) For the purpose of protecting and monitoring CMP's assets and properties, which includes, but is not limited to, using video surveillance at the entrances and exits to CMP's properties;
- (e) Such other collections and uses of personal information from such persons and for such purposes for which CMP may obtain consent from time to time; and
- (f) As otherwise required or permitted by law.

For customers in Quebec: CMP will keep the personal information of these individuals at the CMP storage facility where these individuals have stored their items.

For suppliers in Quebec: CMP will keep their personal information of these individuals at its office in Montreal, at the following address: 24 Chopin Avenue, D.D.O. Quebec, H9G 1J6.

For other individuals in Quebec: CMP will inform these individuals of the place where it will keep their personal information.

CMP may also transfer personal information of the above-named individuals to third party service providers to the extent required and for the purpose of providing administrative or technological support services to CMP. An example of such a service provider includes (but is not limited to) website support companies.

4.2 Withdrawal of Consent

An individual may withdraw his/her consent at any time, on reasonable notice, subject to legal or contractual restrictions. CMP will inform the individual of the implications of such withdrawal. For example, where an individual withdraws consent to the uses of his or her personal information as set out in the foregoing section "Customers, Suppliers and Other Individuals", such withdrawal may result in CMP being unable to provide its services to such individual.

5.0 SECURITY

CMP will use reasonable and appropriate measures to ensure the confidentiality and protection of personal information against loss, theft, unauthorized access, collection, use, disclosure, copying, modification, disposal, destruction or similar risks.

The methods of protection used include:

- Physical measures such as locked filing cabinets,
- Technological measures, such as the use of passwords and encryption.

CMP expects all of its employees to follow established guidelines in order to ensure the security of personal information in circumstances where they have access to such information. These guidelines include those set out in the Privacy Procedures and in CMP's Policies regarding systems security and communications technology use.

Personal information of customers, suppliers, and other individuals will only be accessed by CMP's on-site managers and CMP's managerial team, on a need-to-know basis.

CMP is responsible for personal information in its possession or custody, including information that has been transferred to a third party for processing.

Therefore, if CMP transfers personal information to third party contractors, it will require those contractors to covenant with it that they will provide the same security protection over the information as CMP.

6.0 ACCURACY

CMP will use reasonable efforts to ensure that personal information is as accurate, complete and up-to-date as is necessary for the identified purposes. This is to minimize the possibility that inaccurate information could be used to make a decision about an individual.

To ensure the foregoing, CMP requires each individual who provides CMP with personal information to ensure that that information is accurate, complete and up-to-date.

If the personal information of an individual changes we expect that the individual or employee will make CMP aware of those changes so that CMP can update the personal information in question.

7.0 ACCESS

Upon written request by an individual, complete with sufficient detail of the information being requested, CMP will, within the time limits as set out in the applicable legislation, do the following:

- Inform the individual of the existence, use and disclosure of his or her personal information, (including a list of the organizations to which CMP has, or may have, disclosed the individual's personal information), and

- Provide the individual with access to that personal information,
- Except where CMP is permitted or prohibited by law from doing so.

In certain circumstances, CMP is required by law to remove certain types of personal information from a document that contains personal information about the individual applicant, and then provide the individual access to this document. In those circumstances, CMP will comply with this obligation.

In certain circumstances, CMP is required by law to deny access to personal information. CMP will comply with this obligation where applicable.

8.0 CORRECTION REQUESTS

An individual may request CMP, in writing, to correct personal information about the individual that is under CMP's control, if the individual believes that this information contains an error or an omission.

If the information is subject to interpretation or is an opinion CMP is not required to change the record but will annotate the record to indicate the individual's request.

CMP will make a reasonable effort to assist access and correction applicants and to respond to them as accurately and as completely as possible.

9.0 RETENTION

CMP will keep all personal information that has been used to make a decision about an individual long enough to allow the individual access to the information after the decision has been made or, in any case, for at least one year after such decision has been made.

Where the personal information is the subject of a request from an individual, CMP will retain the information for as long as is necessary to allow the individual to exhaust any recourse under the applicable privacy laws.

CMP will destroy or anonymize personal information when it no longer needs to retain the information for the purpose for which it was collected, and retention is no longer necessary for legal or business purposes.

When destroying or anonymizing this information, CMP will use appropriate security measures to ensure that the confidentiality of this information is maintained.

10.0 TRAINING

CMP will train the necessary personnel with respect to their obligations regarding the privacy policy.

11.0 COMPLAINTS

An individual may direct a complaint concerning the collection, use or disclosure of his or her personal information, or about the application of the Policy, to the attention of the Privacy Officer.

The complaint must be writing. Within a reasonable time of receipt of the complaint, the Privacy Officer will conduct an investigation into the complaint. The format of this investigation will vary, depending on the circumstances, and may or may not involve an interview of the complainant and/or CMP employees.

Within a reasonable time of conclusion of the investigation, the Privacy Officer will inform the complainant, either verbally or in writing, of the outcome of the complaint. If a complaint is found to be justified, CMP will take appropriate measures necessary to rectify the complaint.

Other comments and questions regarding this Policy or its administration should be forwarded to the attention of the Privacy Officer.