



## SAFE BAG CANADA INC.

### EMPLOYEE AND CANDIDATE PRIVACY POLICY

Safe Bag Canada Inc. collectively referred to as "**Safe Bag**" acting as data controller with respect to its Employee's and Candidate's (as defined below) Personal Information (as defined below), values all laws surrounding privacy and is committed to respecting each of its Employees' and Candidate's right to privacy in the workplace. In accordance with Applicable Privacy Laws (as defined below).

This Employee and Candidate Privacy Policy ("**Policy**") describes how Safe Bag Processes (as defined below) and secure our Employee's and Candidate's Personal Information and how this Personal Information can be consulted or corrected if necessary.

#### 1. DEFINITIONS

"**Applicable Privacy Laws**" means any legislation, regulation, recommendation applicable to privacy matters including notably, where applicable, the *Act Respecting the protection of personal information in the private sector* - the "**Quebec Private Sector Act**"; the *Personal Information Protection and Electronic Documents Act* - PIPEDA; the *EU General Data Protection Regulation* - the "**GDPR**", as well as any other applicable legislation, regulation, recommendation or official guidance replacing, adding to or amending, extending, reconstituting or consolidating the Applicable Privacy Laws.

"**Candidates**" means any individual who applies for employment at Safe Bag.

"**Employees**" means all employees i.e., director, employee, agent, consultant, trainee, and any other person who works and who is entitled to a wage on behalf of or for Safe Bag at all times, either on a full-time or part-time and permanent or temporary basis.

"**Personal Information**" means any factual or subjective information, recorded or not, about an identifiable individual, such as age, gender, birth date, province of residence, preferences, opinions, that can directly identify that individual (for example an individual's name), or that could identify indirectly that individual once the information is combined (for example the elements of a physical description). Personal Information that is adequately anonymized is not considered Personal Information.

**Safe Bag Canada INC**  
Vaughan Metropolitan Centre  
100 New Park Place, Suite 1400  
Vaughan, ON, L4K 0J3

T (416) 777-8449  
F (905) 265-6390

[www.safe-bag.com](http://www.safe-bag.com)

TraWell Co

Proudly listed on  
Ticker: TWL MI





**“Processing”** means any operation which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## **2. OBJECTIVES**

Safe Bag wishes to be transparent and provide details about its practices related to the Processing of its Employee’s and Candidate’s Personal Information and the goal of this Policy is to provide such details.

This Policy includes details about:

- the types of Personal Information collected by Safe Bag, as well as the purposes and the methods for the collection;
- how Safe Bag uses the Employee’s and Candidate’s Personal Information it has collected and the circumstances in which it can be disclosed;
- how long Safe Bag keeps the Employee’s and Candidate’s Personal Information, and how it is destroyed at the end of the retention period;
- the Employees’ and Candidates’ rights concerning their Personal Information, and how to exercise these rights;
- where the Employee’s and Candidate’s Personal Information is stored and how it is secured.

## **3. SCOPE**

This Policy applies to the Personal Information of every Employees and Candidates of Safe Bag;

## **4. EMPLOYEES’ AND CANDIDATES’ CONSENT**

*Employee’s and Candidate’s consent will be obtained prior to Safe Bag’s Processing of the Personal Information. For more information, please [click here](#).*

Safe Bag will Process Employees’ and Candidates’ Personal Information only with their consent or as permitted or required by Applicable Privacy Laws. How Safe Bag obtains consent (i.e. the

**Safe Bag Canada INC**  
Vaughan Metropolitan Centre  
100 New Park Place, Suite 1400  
Vaughan, ON, L4K 0J3

T (416) 777-8449  
F (905) 265-6390

[www.safe-bag.com](http://www.safe-bag.com)

**TraWell Co**

Proudly listed on  
Ticker: TWL MI





means used) and the form of it (i.e. either express or implied) will depend on the circumstances, as well as the sensitivity of the information collected. If the Employee or Candidate chooses to provide its Personal Information to Safe Bag, it will be assumed that the consent is given for the Processing of such Personal Information as outlined in this Policy.

In the event where Safe Bag would want to use Personal Information for another purpose, Safe Bag will seek consent again prior to such new use.

If the Employee or the Candidate provides Personal Information about another individual to Safe Bag (such as a member of its family), it is the Employee's or Candidate's responsibility to obtain the consent of that individual to enable Safe Bag to Process the Personal Information as described in this Policy.

## 5. COLLECTION AND USE

*Safe Bag will Process Employees' and Candidates' Personal Information in accordance with the Applicable Privacy Laws and the goal of such Processing is to manage the working relationships. To know more, please click here.*

Safe Bag Processes the Employees' and Candidates' Personal Information in accordance with the Applicable Privacy Laws. The main collection of Personal Information of Employee's Candidate's is through documentation provided at the time of hiring. The main goal of such Processing is to provide better management of the relationship between the Employees and the Candidates and Safe Bag, there are also safety and legal purposes. More specifically the objectives are as follows:

Objectives	Legal Basis under the RGD	Examples
To assist in the talent acquisition	Legitimate interests	Personal Information about applicants in the course of selection testing or pre-employment testing, which is reasonably required for the performance of the job.
To administer compensation, and if applicable benefits, pension and other retirement benefits, severance, and other monetary benefits of	Legal obligation	Personal Information about work schedule, wage rate or salary in order to determine basic compensation.

**Safe Bag Canada INC**  
Vaughan Metropolitan Centre  
100 New Park Place, Suite 1400  
Vaughan, ON, L4K 0J3

T (416) 777-8449  
F (905) 265-6390

[www.safe-bag.com](http://www.safe-bag.com)

TraWell Co

Proudly listed on  
Ticker: TWL MI





employment during the onboarding		
To manage, develop and maintain a workforce that supports Safe Bag' business goals	Consent	Personal Information about performance and training, in order to make decisions about employment.
To develop our social media and recruitment advertising	Consent	Pictures of employees at work related events can be published on social medias.
To monitor and foster Employee's or Candidates' safety and health	Legal obligation	Administering disability benefits, for determining the need for accommodations or the ability to return to work safely.
To meet legal and regulatory requirements	Legal obligation	Personal Information to comply with Safe Bag legal and regulatory requirements pursuant to Applicable Privacy Law.
To protect Safe Bag' assets and facilities	Legitimate interests	may record information about the entry and exit of Employees on company property.
To communicate with Employees and Candidates	Performance of an agreement	Facilitate communications with Employees and Candidates family members in case of medical emergencies or other situations which might require contacting family members.

**The types of Personal Information Processed by Safe Bag includes, but is not limited to:**

Name; Address; Telephone number; Date of Birth; Gender; Social Insurance Number (SIN); Resume and References; Qualifications and skills; Performance evaluations; Work record; Bank account information; Legal employment documentation; Educational documents; Criminal record; Marital status; Spouse and/or dependent names and birthdates (if applicable); Employee photo (for Employee records, Employee profile on email profile), etc.

**Safe Bag Canada INC**  
 Vaughan Metropolitan Centre  
 100 New Park Place, Suite 1400  
 Vaughan, ON, L4K 0J3

T (416) 777-8449  
 F (905) 265-6390

[www.safe-bag.com](http://www.safe-bag.com)



Proudly listed on  
 Ticker: TWL MI





## 6. ACCURACY OF PERSONAL INFORMATION OF EMPLOYEES OR CANDIDATES

Employee's or Candidate's Personal information Processed by Safe Bag is kept as accurate and complete as reasonably possible, however there is an assumption that the information provided directly by the Employee or Candidate is up to date. If part of the Personal Information changes during the course of employment, it is expected that the Employee will make Safe Bag aware of those changes, in order to update the employment file.

## 7. COMMUNICATION OF PERSONAL INFORMATION

*Safe Bag may provide Employees' or Candidates' Personal Information to its service providers to manage the work relations, to meet a legal obligation or to enforce its rights. For more information, please click [here](#).*

Employees' or Candidates' Personal Information will only be made available to third parties to fulfill the purposes for which it was collected or as set forth in this Policy. Safe Bag will not sell, rent or trade Personal Information to any third party. However, Safe Bag may disclose Employee's or Candidate's Personal Information to third party to allow the provision of specific services, for evaluation of possible business transaction or when authorized and/or required by law.

### 7.1 Third Parties

We may share Employee's and Candidate's Personal Information with any entity within our group, such as TRAWELL CO SpA. In addition, Safe Bag may hire service providers, person or organization, to perform services on its behalf. In such cases, Safe Bag will provide only the minimum amount of Personal Information necessary for the services to be provided. In any cases,

**Safe Bag Canada INC**  
Vaughan Metropolitan Centre  
100 New Park Place, Suite 1400  
Vaughan, ON, L4K 0J3

T (416) 777-8449  
F (905) 265-6390

[www.safe-bag.com](http://www.safe-bag.com)

TraWell Co

Proudly listed on  
Ticker: TWL MI





third parties can only use the Personal Information to carry out the services they have been engaged to provide and are not permitted to disclose any Personal Information.

Safe Bag inform them that they are prohibited from using Personal Information for any purpose other than to perform the services for which they have been retained. These service providers are not permitted to share the Personal Information of Employees and Candidates with others.

Safe Bag will strive to protect Employee's and Candidate's Personal Information disclosed to third parties by requiring that those third parties be bound by confidentiality and non-use obligations at least equivalent to those employed by Safe Bag itself.

Please find below a list of our third-party service providers that may process Employees' or Candidates' Personal Information:

- PEO : payroll provider
- TRAWELL CO SpA

Employees or Candidates who desire to obtain more information about the service providers, may contact Safe Bag by following the instructions provided in the "Contact us?" section.

## 7.2 Business transaction

Safe Bag may disclose Employee's or Candidate's Personal Information to a third party in connection with a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of its business, brands or other assets. During the course of the negotiations, Safe Bag will require the third party to be bound by confidentiality and non-use obligations at least equivalent to those employed by Safe Bag itself. In the event the transaction is completed, Employee's or Candidate's Personal Information will remain protected by Applicable Privacy Laws. In the event the transaction is not completed, Safe Bag will require the other party not to return or destroy such Personal Information.

### 7.2 As permitted or required by law

Safe Bag may disclose Employees' or Candidates' Personal Information when it is compelled to do so in response to a law, regulation, court order, subpoena, search warrant, government investigation or other legally valid request or enquiry. Safe Bag may also disclose Employees' or Candidates' Personal Information to its external accountants, auditors, agents and lawyers in connection with the enforcement or protection of its legal rights. Finally, Safe Bag may release

**Safe Bag Canada INC**  
Vaughan Metropolitan Centre  
100 New Park Place, Suite 1400  
Vaughan, ON, L4K 0J3

T (416) 777-8449  
F (905) 265-6390

[www.safe-bag.com](http://www.safe-bag.com)

**TraWell Co**

Proudly listed on  
Ticker: TWL MI





certain Employees or Candidates Personal Information when it has reasonable grounds to believe that such release is necessary to protect the rights and safety of others individual, in accordance with Applicable Privacy Law.

### 7.3 To perform an agreement and other legal grounds

To the extent applicable and necessary, Safe Bag may disclose Employee's or Candidates' Personal Information to enter into agreement, or for any other recognized purpose that we may have for disclosing information.

## 8. RETENTION OF PERSONAL INFORMATION

Employees' and Candidates' Personal Information will be retained only for as long as it is necessary to fulfill the purposes for which it was collected and always in accordance with Applicable Privacy Law. In specific situation where Safe Bag uses Employees' and Candidates' Personal Information to make a decision that directly affects the Employee or the Candidate, such information will be retained even after the purpose is completed. For more details about retention of Personal Information, Employees or Candidates may refer themselves to Safe Bag' Data Retention and Destruction Policy.

## 9. TRANSFER OF PERSONAL INFORMATION

*Employees' or Candidates' Personal Information is currently hosted in Italy. For more information, please click here.*

Employees' or Candidates' Personal Information is currently stored in Italy. If need be, it may be stored and Processed in any country where Safe Bag has facilities or in which Safe Bag uses third-party service providers.

If Employee's or Candidate's Personal Information is transferred outside Quebec or Canada, its Processing will be subject to the laws of the province or country in which it is located and may be disclosed to government bodies, courts, law enforcement or regulatory agencies of that other province or country in accordance with the local laws. Further, the recipient third party must provide adequate level of protection that can be compared to the level of protection the Personal Information would receive if it had not been transferred. Adequate protections include in particular a written agreement setting forth the roles and responsibilities of the parties with regards to Personal Information, in particular, the steps that the third party shall take :

**Safe Bag Canada INC**  
Vaughan Metropolitan Centre  
100 New Park Place, Suite 1400  
Vaughan, ON, L4K 0J3

T (416) 777-8449  
F (905) 265-6390

[www.safe-bag.com](http://www.safe-bag.com)

TraWell Co

Proudly listed on  
Ticker: TWL MI





- to protect the confidentiality of the Personal Information provided
- to ensure that the Personal Information is used only for the purpose covered in the agreement
- to ensure that it is not retained after the expiration or early termination of the agreement.

In addition, the agreement must state the following:

- the third party shall promptly notify the Privacy Officer of any breach or attempted breach by any person of any of the confidentiality obligations contained in the agreement;
- the Privacy Officer reserves the right to conduct any audit relating to such confidentiality.

## 10. EXERCISE OF RIGHTS

*Employees and Candidates have some rights regarding their Personal Information. To learn more about Employees' and Candidates' rights, please [click here](#).*

On written request and subject to proof of identity, Employees and Candidates may access their Personal Information that Safe Bag has, either physically or on their servers, to ensure that any necessary corrections be made, if necessary, as authorised or required by Applicable Privacy Laws.

The Employees and Candidates may have the following rights with respect to their Personal Information under certain conditions and depending on their location:

- the right of access and rectification of Personal Information;
- the right to withdraw consent to Processing;
- the right to have Personal Information about them erased or deleted, subject to certain conditions;
- the right to object to the unlawful Processing of Personal Information, under certain conditions;
- the right to request a restriction of the Processing of their Personal Information, under certain conditions;

**Safe Bag Canada INC**  
Vaughan Metropolitan Centre  
100 New Park Place, Suite 1400  
Vaughan, ON, L4K 0J3

T (416) 777-8449  
F (905) 265-6390

[www.safe-bag.com](http://www.safe-bag.com)

TraWell Co

Proudly listed on  
Ticker: TWL MI







- the right to data portability of Personal Information in a structured, commonly used and machine-readable format, under certain conditions; and
- the right to object to decisions made by automated means that have legal effect on the Employee or the Candidate, under certain conditions.

To exercise any of these rights, the Employee or the Candidate may contact Safe Bag by following the instructions provided in the “Contact us?” section.

Safe Bag is entitled to refuse access to the Employees’ and Candidates’ Personal Information in certain situations as provided by Applicable Privacy Laws.

## **11. SECURITY**

Safe Bag will implement security measures to access both the physical and electronic files of the Employees and Candidates containing Personal Information.

For example, only authorized personnel, who are bound by confidentiality obligations, have access to both the physical and electronic files containing Employee and Candidate Personal Information. Employee and Candidate Personal Information stored electronically will be adequately protected by security measures and passwords and will be accessible only to those personnel who require access to perform their duties, including Employees in the Human Resources department and certain authorized managers.

## **12. REVIEW AND CONTINUAL IMPROVEMENT**

This Policy shall be reviewed on an annual basis in order to ensure its accuracy and to reflect changes in the legal obligations or in the manner in which Safe Bag deals with Employee’s or Candidate’s Personal Information.

**Safe Bag Canada INC**  
Vaughan Metropolitan Centre  
100 New Park Place, Suite 1400  
Vaughan, ON, L4K 0J3

T (416) 777-8449  
F (905) 265-6390

[www.safe-bag.com](http://www.safe-bag.com)

TraWell Co

Proudly listed on  
Ticker: TWL MI





### 13. CONTACT US

The Privacy Officer will independently assess allegations of violations of this Policy by reviewing practices and alleged facts and determine whether follow-up corrective action is required.

All comments, questions, concerns or complaints regarding your Personal Information or our privacy practices should be sent to our Privacy Officer as follows:

Address: Attention: Privacy Officer  
RUDOLPH  
GENTILE  
By e-mail: [privacy@trawellco.com](mailto:privacy@trawellco.com)

### 14. REVISION HISTORY

Version	Date	Author	Summary of changes
1.0	2024-02-15	Privacy Officer/DPO	Initial version

This Policy is current as of the date which appears in the above chart. Safe Bag may modify this Policy from time to time. When Safe Bag makes changes to this Policy, they become effective immediately when made available to the Employees and the Candidates. If the changes are significant, Safe Bag may request a new consent.

**Safe Bag Canada INC**  
Vaughan Metropolitan Centre  
100 New Park Place, Suite 1400  
Vaughan, ON, L4K 0J3

T (416) 777-8449  
F (905) 265-6390

[www.safe-bag.com](http://www.safe-bag.com)

TraWell Co

Proudly listed on  
Ticker: TWL MI

