

Quebec's Law 25 Compliance Statement



Our commitment to protecting personal information.

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Corporate Traveller complies with Quebec's Act to modernize legislative provisions respecting the protection of personal information ("Law 25") as a key standard for its operations when serving Quebec-based clients and handling Quebec residents' personal information. Similar to existing legal requirements, compliance with Law 25 requires a partnership between Corporate Traveller and our corporate customers in their use of our services.

As a business handling personal information, Corporate Traveller applies its Data Processing Addendum ("DPA") when providing travel services to Quebec-based clients, enabling clients to transfer personal information to Corporate Traveller with confidence. Corporate Traveller's DPA describes the roles and responsibilities of Corporate Traveller and our clients, the scope of personal information processing, cooperation and assistance requirements, information security, transfer mechanisms and the technical and organizational measures used in the delivery of our services.

Our Approach to Quebec Privacy Compliance

The comprehensive scope of Law 25 means it impacts how we handle personal information of Quebec residents regardless of where our operations are located. As a global brand serving Quebec clients, Corporate Traveller has implemented an integrated programme to ensure a robust and consistent approach to privacy protection compliance across our network. In addition, we have appointed privacy protection officers to establish an ongoing focus on personal information security.

Corporate Traveller's Data Protection Officer can be contacted at: Privacy@am.flightcentre.com

Privacy Impact Assessments

Procedures are in place to identify processing activities that might represent significant risks to the privacy of individuals so that privacy impact assessments ("PIAs") are carried out when required under Law 25. When risks are identified, mitigating actions are identified, implemented and recorded.

Transparency and Consent

All applications and IT systems display the appropriate privacy notices for users in accordance with Law 25's transparency requirements. Where consent is required for marketing purposes or other processing activities, the consent is accurately recorded and managed in our system, meeting Law 25's standards for valid consent. See additional section below on 'Marketing and General Communication'.

Data Storage and International Transfers

Personal information collected by Corporate Traveller is stored outside of Canada, in secure data centers. We ensure storage facilities adhere to rigorous international standards for data protection and privacy, safeguarding the information with advanced security measures.

In accordance with Law 25's requirements for international transfers of personal information, Corporate Traveller has implemented appropriate safeguards and contractual measures to ensure that personal information transferred outside of Quebec maintains equivalent protection.

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These measures include:

- Comprehensive data processing agreements with our storage providers that incorporate Quebec privacy protection standards
- Regular audits and assessments of our international storage facilities
- Encryption and security protocols that meet or exceed Law 25 requirements
- Clear data retention and destruction policies aligned with Quebec privacy legislation

Information Management and Retention

Policies and personal information retention schedules are maintained to ensure that personal information is kept no longer than necessary for the purposes for which it was collected, in accordance with Law 25's retention limitations, and to prevent its use beyond its original intended purpose.

Privacy by Design and Default

Corporate Traveller's IT function has developed and applied guidance and training in privacy by design and default principles as required under Law 25. This enables us to ensure that new systems or applications have privacy protection measures built in from the outset.

Privacy Incident Management

Corporate Traveller has robust incident response capabilities to deal effectively with privacy breaches in accordance with Law 25's notification requirements. Our response procedures are regularly reviewed and tested to ensure they operate effectively and align with Law 25's breach notification timelines and requirements to both the Commission d'accès à l'information du Québec and affected individuals.

Business Continuity

Corporate Traveller maintains robust business continuity measures to ensure the ongoing protection of personal information during disruptions, in compliance with Law 25's security requirements.

Third-Party Management

We regularly review our contractual provisions with suppliers and third parties to ensure they adequately cover the standards required under Law 25, including appropriate safeguards for transfers of personal information and compliance with Corporate Traveller's instructions and contractual terms regarding the handling, return, destruction or deletion of personal information.

Marketing and General Communication

Corporate Traveller believes it is important to provide our clients with information about us and our range of services, as well as insights into travel management, thought leadership and industry updates. Through our client relationship management system, we issue regular communications on a subscription basis.

Contact with 'Corporate Subscribers' is conducted in accordance with Law 25's consent requirements where applicable, and based on legitimate business interests where permitted. With every communication, individuals are offered an opportunity to unsubscribe from receiving further email communication, in compliance with Law 25's opt-out requirements.

Culture and Training

Corporate Traveller has a comprehensive change management, communications and training program that continuously establishes improved cultural norms, values, beliefs and behaviors relating to privacy protection at Corporate Traveller, including a mindset of privacy by design and default as required under Law 25.

All Corporate Traveller staff are required to undertake mandatory annual Privacy Protection and Information Security courses.