

Privacy Policy			
Revision Number	2	Accountability	President
Policy Number	448	Operational Responsibility	Talent and Culture
Date of Approval	April 30, 2025	Last Reviewed	February 20, 2025
Approval Authority	LCI Education Board	Next Review	April 2030

1. Introduction

The purpose of this Privacy Policy (“Policy”) is to introduce you to our practices in respect of the collection, use, communication, sharing and management of personal information. This Policy also describes the measures we take to protect the security of this information as well as how you may access, modify or erase your personal information, withdraw your consent to the communication or use of the information collected, or assert any other right you may have regarding your personal information under applicable law.

2. Scope

This Policy applies to you as a data subject within the meaning of applicable law relating to the protection of personal information, in connection with your browsing of all LCI Education websites (collectively, our “Website”). This Policy also applies to you if you create a user account on our platform, if you apply for admission or employment, or if you communicate with us through the Website, social media or otherwise.

For the purposes of this Policy, “personal information” (also known as personal data) means any information about an individual from which that individual may be identified, directly or indirectly, and any other information covered by applicable privacy legislation as the case may be. This does not include information that has been processed in such a way that it no longer directly or indirectly identifies an individual (anonymized data).

3. Consent

Unless provided otherwise by applicable law, your consent to this Policy is required to fulfill the various purposes described herein. If you access or use the Website, create or use a user account, file a request for information, admission or employment, or contact us by any means, you are deemed to consent to this Policy.

If for any reason you do not wish your personal information to be processed in accordance with this Policy, please do not use the Website or provide us with your personal information. Please note that you may also withdraw your consent at any time and exercise the rights listed in Section 14 or any other right granted to you by applicable law, as the case may be.

If you are not of the age legally required to accept our Policy, your parent or legal guardian must accept this Policy on your behalf.

4. Who we are

LCI Education is not a single, integrated corporate entity, and each entity within the group is a separate legal entity. For the purposes hereof, the term “LCI Education” refers to a group of higher education institutions established globally (each a “Member Campus”), as well as Collège LaSalle International Inc. (hereinafter “CLI”), 8240175 Canada Inc., doing business under the names LCI Éducation - Admissions Globales or LCI Education

- Global Admissions (hereinafter “Global Admissions”), and 2508435 Canada Inc., doing business under the name Zoom emploi (hereinafter “Zoom Emploi”), all as further detailed in the table at the end of this Policy.

The entity responsible for processing your personal information is Global Admissions in conjunction with the given Member Campus in applicable cases, except in the context of a job application, in which case the responsible entity is CLI and the applicable Member Campus, and in the event that you are one of our graduates and you use our service to connect with potential employers, through our platform called Portfolio, in which case the responsible entity is Zoom Emploi.

The use of the expressions “we” or “our” in this Policy refers to the entity responsible, as appropriate. Member Campuses share certain resources, including Global Admissions services, to access relevant personal information in the context of their activities.

5. How we collect your personal information

We collect personal information in various ways, including:

- 5.1. Through our direct exchanges
- Creation of an LCI Education ID;
- Creation of an LCI Education user account;
- Production of a request for information;
- Production of an application for admission;
- Participation in an event organized by LCI Education;
- Registration for a contest or promotion;
- Participation in sponsorship and donations;
- Use of interactive or social media features on our Website;
- Use of social media;
- Job application;
- Sharing of information in connection with our Alumni association via our portfolio site;
- Subscription to our newsletters;
- Registration for our mailing lists, email communications and messaging services, to receive promotional offers, updates and/or news. For example, the announcement of open doors, new programs and news about events; and/or
- Other communication with us, specifically including submitting a comment or making a complaint (customer service).

5.2. When you browse the Website

When you browse the Website, we automatically collect certain information, including through cookie files (also called “cookies”). For more information, please refer to our Cookie Policy.

5.3. Through third parties

In some cases, we may collect information about you from other sources (with your consent when required by applicable law) – including the various government departments and Ministries that regulate our activities, our service providers and business partners, social media, and publicly or commercially available sources – and combine this information with information we collect about you by other means.

6. What personal information we collect

We may collect and process different types of personal information about you that we have grouped as follows:

- Contact information, including name, email address, title, telephone number, mailing address, transactional information and contact preferences;
- Personal data, including date of birth, proof of citizenship, proof of residence, social insurance number, passport number, proof of First Nations citizenship (for some institutions only), mother tongue, spoken languages, gender, any personal situation that could lead to a particular need for support by any of our institutions, presence or absence within our institutions;
- The names and addresses of your parents or legal guardians (in certain circumstances);
- Your image or photographs when you are on campus;
- Documents relating to study visas;
- Programs of interest;
- Your previous academic career, including in certain circumstances the years you graduated and your previous student numbers;
- Data about your financial situation in some cases;
- Data related to your work experience, including the names of former employers;
- Authentication data, including your username and password;
- Social media data, including information associated with any social media account you hold and the associated profile, such as name, username, email address, profile photo, date of birth and gender;
- Transaction data, including details about payments between us and other details about products and services you have purchased from us;
- Customer service data, including information about technical issues, comments or suggestions you provide;
- Technical data, including IP address (Internet protocol), your connection data, number of clicks and other related information, such as websites you visited immediately before and after your visit to our Website, your time zone and geographic area settings, the Internet service provider you use and other technologies on devices you use to access our Website;
- Usage data, including the number of visits to our Websites, the date and average time spent on our Websites, as well as information about how you use our products and services;
- Marketing and communication data, including your preferences for receiving marketing from us and from our third parties and your communication preferences.

We do not collect any personal information that reveals political opinions, religious or philosophical beliefs, or any genetic data for the purpose of uniquely identifying a natural person, or any data regarding the sexual orientation of a natural person. In the event that you request and receive some of the services available to students (e.g., on-campus medical clinic, mental health support services, etc.), the service provider may ask you to provide, on a voluntary basis, various types of personal information, which may be sensitive. In this case, this information will be processed in accordance with the conditions of service and confidentiality that are specific to the service in question, subject to the ethical obligations of the service providers, where appropriate. Please contact the service provider of your choice for further information in this regard.

Consequences of a refusal to provide certain personal information: When we need to collect personal information under the law or a contract we have with you, if you do not provide that information upon request, we may not be able to perform the contract in question. In this case, we may have to cancel the delivery of a product or the performance of a service that you have requested from us insofar as your refusal makes it impossible to perform our obligations, but we will inform you if this is the case at the appropriate time.

7. How we use the personal information we have collected

- 7.1. Purposes for which personal information is collected

The personal information we collect may be recorded or used depending on whether you are of interest to us in academic or employment matters, as follows.

If your interest is academic, personal information will be used to:

- Allow us to answer your questions related to our various programs;
- Provide you with information about LCI Education, including additional programs you can benefit from;
- Process your application for admission to any of the programs of the institution of our group that may be of interest to you;
- Proceed with your registration;
- Manage your experience as a learner and your graduate experience, as applicable to you;
- Facilitate your relationship with potential employers;
- Offer you additional services;
- Track your learning record;
- Monitor placements or program assessments;
- Allow you to use the interactive or social media features on our Website;
- Comply with regulatory requirements; and
- Where appropriate, any other specific purpose that is disclosed to you at the time your information is collected or to which you subsequently consent.

If you are interested in employment, your personal information will be used to process your job application and for the purposes of the assessment and hiring process, where appropriate.

- 7.2. Who can access your personal information?

If your interest is academic, your personal information is collected and centralized by Global Admissions and may be transmitted to and used by each of the Member Campuses to the extent reasonably necessary for the purposes described in this Policy.

In the case of a job application, your personal information is collected and centralized by CLI and transmitted to the Member Campus or other LCI Education entity to which your application relates, as applicable.

If you are one of our alumni and your interest is in connecting with potential employers, your personal information is collected and centralized by Zoom Emploi, and forwarded to the relevant Member Campus or other LCI Education entity to the extent necessary to provide you with the services requested and to facilitate your job search (including for internships), where appropriate.

In any case, your personal information may also be communicated internally among LCI Education's member entities, their subsidiaries and affiliated companies, insofar as there is a need to access the information in order to enable us to adequately respond to your requests, communicate with you or achieve the purposes described in this Policy.

In addition, we may disclose your personal information to the following third parties for the following reasons:

- Our subcontractors, service providers and partners, i.e., third parties who provide services to us or provide them on our behalf and any other third party we use to support our activities, in order to enable us to operate our business, offer our services, achieve the purposes described herein, fulfill our legal obligations and advance or protect our legitimate business interests. We only provide these third parties with the information they need to perform their duties and we do not allow them to use or communicate

personal information for their own commercial or other purposes;

- Regulatory authorities with the aim of reporting data about our learners or employees to the various Ministries to comply with regulatory requirements;
- Courts and other persons or entities responsible for enforcing the law or authorized by applicable law to collect or compel the disclosure of information, including for investigative or judicial purposes. We and our third-party service providers may communicate your personal information to respond to a search warrant or other lawful request or order, or to respond to an investigative body in the event of a breach of contract or violation of the law, or as otherwise required or authorized by law. We may also communicate personal information as necessary to assert or exercise legal claims or to assert a defense against such claims, or for the purpose of preventing actual or potential losses or avoiding personal injury or property damage; and/or
- An entity not related to LCI Education in the event that we sell part or all of our business or if we sell or transfer assets or otherwise participate in a merger or transfer of business with that other entity. Where appropriate, we may transfer personal information about you to a third party in the context of the transaction, subject to the legal conditions applicable to the communication of personal information in such a context.

Our employees, as well as our consultants, subcontractors, service providers and any other third party we use to support our activities, are contractually required to keep your personal information confidential.

8. Third-party websites

Our Website may contain links to third-party websites, i.e., websites that do not belong to and are not operated by an LCI Education member entity. Conversely, links to our Website may appear on third-party sites on which we advertise. We will not communicate your personal information to these third parties without your consent. We offer the user links to third-party websites for convenience. These links are not intended as an endorsement or recommendation of the linked sites. Third-party sites are subject to privacy statements, terms of use and other terms that are separate and independent from our own, and which we recommend you read carefully. We have no control over these sites and therefore we accept no liability for how the organizations that operate these sites may collect, use, communicate, obtain or otherwise process your personal information.

9. How we protect you personal information

We have established and enforce administrative, technical and physical security measures to protect your personal information under our possession or control against unauthorized access, use, modification and communication.

10. How long we keep your personal information

Our policies and procedures for the retention, destruction and anonymization of personal information are designed to retain personal information only for as long as necessary to achieve the purposes described in this Policy or to otherwise comply with the requirements of applicable law. Please note that instead of destroying your personal information, we may make it anonymous in accordance with generally accepted best practices and any applicable legal requirements, where we have a serious and legitimate reason to do so. We have adopted a data retention policy; if you have any questions in this regard, please contact us as specified below.

11. Transfer of personal information to other territories

Your personal information will be processed and stored in Canada.

In some cases, your personal information may also be collected, communicated, used, stored or otherwise processed outside of Canada, in the European Economic Area ("EEA") and elsewhere, in particular by the Member Campus where you are registered or with which you are requesting admission or information, by a subsidiary or affiliated company or by a third-party service provider, and this personal information may be communicated in accordance with the laws applicable in the territories concerned.

These laws may not provide the same level of protection as Canadian or EEA privacy laws. However, we will take all reasonable steps to ensure that any personal information transferred outside of Canada or the EEA is processed securely and in accordance with applicable law on cross-border transfers of personal information.

12. Changes to the Privacy Policy

This Policy is regularly revised and may be updated from time to time to reflect changes to our personal information practices. Changes will be notified by displaying the amended Policy on the Website and by any other appropriate means or required by applicable law. We will process your personal information in accordance with the latest version of the Policy. The last amendment was made on the date indicated at the beginning of the Policy.

13. To communicate with us

We have appointed a Privacy Officer who oversees matters related to this Policy. For any questions or comments regarding how we process your personal information, and any requests to exercise your rights, including to request access to, update or correct your personal information in our possession, you should contact this resource by email or mail:

Mery Paz Monroy

Email address: privacy@lcieducation.com

Mailing address: 1400, rue du Fort, suite 9000, Montreal (Quebec) Canada H3H 2T1

You have the right to file a complaint at any time with the regulatory authority that enforces the applicable legislation on the protection of personal information, in particular:

- For the purposes of Quebec legislation: *Commission d'accès à l'information*.
- For the purposes of British Columbia legislation: *Office of the Information and Privacy Commissioner for British Columbia*.
- For the purposes of data protection legislation of the EEA and Spain: *Agencia Española de Protección de Datos*.

We would like to have the opportunity to address your concerns before you contact the regulatory authorities and kindly ask that you contact us first.

14. Your rights with regard to your personal information

You have the following rights with regard to your personal information, subject to the exceptions and conditions provided for by applicable law:

- The right to access your personal information;
- The right to correct or update your personal information;
- The right to the erasure of your personal information;

- The right to object to the processing of personal information for legitimate reasons;
- The right to ask us to restrict the processing of your personal information;
- The right to transfer your personal information to yourself or to a third party;
- The right not to be the subject of certain decisions that are based exclusively on the automated processing of your personal information, or to be informed of it, and to challenge it and submit comments, where appropriate;
- The right to withdraw your consent at any time when we rely on your consent to process your personal information.

Please note that if you withdraw your consent, this will not affect the legality of the processing carried out prior and it may prevent us from providing certain products or services to you, responding to your requests for information, providing technical support or assisting you in any other way in the use of our products or services. We will inform you if this is the case when you withdraw your consent.

We will respond to all legitimate requests in accordance with applicable law. Furthermore, we may need to ask you for specific information in order to allow us to confirm your identity and thus allow you to access your personal information (or to exercise your other rights). This is a security measure to ensure that personal information is not disclosed to a person who is not entitled to receive it. We may also contact you to ask for additional information regarding your request in order to expedite our response.