**DETAILED CONFIDENTIALITY**

**AND PROTECTION OF PRIVACY POLICY**

**Privacy Officer:**

To find out more about the protection of your personal information or to exercise your rights, please contact our Privacy Officer:

Name: Sylvie Bolduc – General Manager

Email address: info@sadclaurentides.org

Telephone: 450-915-2274

This Policy sets out the measures and practices that the SADC des Laurentides (hereinafter "the SADC") has put in place to provide a framework for its governance of personal information and to protect personal information. The SADC collects personal information from its clients, visitors to its website or persons applying for employment with the SADC (hereinafter referred to as "**you**", "**your**" or "**yours**").

In this Policy, "personal information" means any information collected by the SADC that, alone or in combination with other information, directly or indirectly identifies any individual to whom the personal information relates.

**The main purpose of this Policy is to inform you:**

* The **means used** by the SADC to collect personal information;
* The **nature of the personal information** collected by the SADC and the purposes for which it is used;
* How the SADC may **use** the personal information and to which third parties, if any, the SADC may disclose the personal information;
* The various **security measures** implemented by the SADC to protect the confidentiality of personal information; and
* Your **rights** with respect to personal information collected by the SADC, including the right to access your personal information or to request the correction of inaccurate personal information, if applicable.

This Policy and any amended version of it are subject to the legislation applicable in the province of Quebec in Canada.

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## Under what circumstances does the SADC collect personal information, by what means and for what purposes?

There two circumstances in which the **SADC** collects personal information are the following:

* When you **voluntarily provide** personal information to an authorized SADC representative; and
* When you use the **website**.

By submitting your information, you expressly consent to the collection, use, disclosure and retention of your personal information by the SADC in accordance with the terms and conditions set out in this Policy.

### What are the collection methods?

**Personal information may be voluntarily provided to an authorized SADC representative by various means:**

a. By **voluntarily answering** questions from SADC agents who may contact you by telephone, in person, by mail or by e-mail;

b. Providing personal information to **SADC agents** by telephone, in person, by mail or electronically, or in person at job interviews;

c. By **authorizing** the SADC to obtain your credit file from a credit agency;

d. By **voluntarily** submitting your résumé in response to a job offer from the SADC.

**When you visit our website, personal information is collected from you in a number of ways:**

a. Automatically through your **website connection** (your computer and the website server automatically exchange personal information when you connect);

b. Automatically through the installation of temporary **cookies** on your computer and the **use of pixels**;

c. Automatically through the use of our logging processes;

d. By the information you enter in the **forms** available on our website (registration for activities, events, training, requests for information, etc.).

### What personal information does the SADC collect?

In the above-mentioned circumstances, the SADC may collect the following personal information:

#### In the case of a funding application:

#### Last name, first name, preferred language and some of your contact details (telephone number, personal and professional e-mail addresses, etc.);

#### Other personal information such as date of birth and proof of identity

#### Personal and business financial information where necessary to complete a transaction or apply for financing.

#### Personal balance sheet, credit file, company bank account, business plans and other confidential company documents

#### In the case of a job application:

#### Your last name, first name, preferred language and some of your contact details (telephone number, e-mail address, etc.);

#### Information relating to your level of education or training (year of graduation, information relating to primary, secondary, college or university studies, etc.);

#### Criminal record;

#### The position you are applying for (whether it is a regular, part-time or student job);

#### Your previous jobs and work experience;

#### Any personal information provided on your curriculum vitae that we may need to collect in order to assess your application.

#### If you have a car and a driving licence.

#### In the case of registration for an event, training course, activity or newsletter subscription:

* Last name, first name, preferred language and some of your contact information (telephone number, personal and business e-mail addresses, etc.);
* Other personal information such as your interests or preferences, your allergies, your status in the company represented, services already used at SADC.
* Business information when it is required for registration, to analyze your application or to serve you better.
	+ Business plans and other confidential company documents.

#### When you visit our website:

#### The domain name of your Internet service provider;

* Your IP address;
* Your browser (Explorer, Firefox, etc.);
* Your operating system (Windows, Mac OS, etc.);
* The date and time of your visit to the website;
* The pages you visit; and
* The address of the referring site, if you access the website from another site.

In all cases, before collecting personal information about you, the authorized SADC representative will specify the personal information requested before collecting it.

**Other information collected:**

If you send us an e-mail, make a request or communicate directly with us by chat, you may provide us with other personal information, the content of which will vary depending on the nature of the exchanges, including registration forms for events, activities, training, etc. (e-mail address, name of your company, etc.).

Please note that the personal information entered in your exchanges and your communications history with the SADC will be collected.

Finally, any request for access, rectification or withdrawal of consent under the terms of section 7 of this Policy will require you to prove your identity by providing us with valid photo identification and your name. All other personal information contained in this ID may be masked.

## What are the purposes of the personal information collected by SADC agents?

The SADC collects personal information through its agents and website for a number of purposes:

#### For financing purposes

#### To **reply** to your funding requests;

#### To **assess** **the eligibility criteria** for your funding application

#### For employment purposes

#### - To **assess** job applications;

#### - To communicate with job applicants or potential clients and **ensure that communication** with them is personalized;

#### For registration purposes (activities, events, training, etc).

#### - To communicate with you and **follow up** on your registration.

*For general purposes (activities - promotional - legal...)*

* To advertise to customers, visitors or potential job applicants;
* To reply to your requests;
* To assess your needs and interests;
* To ensure compliance with a law, court order or legal procedure;
* To ensure SADC's legal protection in the event of litigation;
* To evaluate and improve protection and security measures;
* To prevent or detect fraud or illegal acts; and
* To respond to complaints and requests for access, rectification or withdrawal of consent.
* To ensure that a visitor to the website can connect to the website;
* To ensure that the website can function properly;
* To evaluate the effectiveness of the SADC's efforts to acquire visitors, customers or candidates;
* To improve the performance of the website and its effectiveness in retaining visitors;
* To identify the legislative regime to which Visitors' personal information is subject;
* To communicate with job applicants or potential clients and ensure that communications with them are personalized;
* To ensure the legal protection of the SADC in the event of a dispute caused by your action or inaction or in the event of a dispute between you and the SADC;
* To evaluate and improve protection and security measures;
* To respond to complaints, requests for access, rectification or withdrawal of consent.

**Links to other sites**

The website sometimes provides links to other websites belonging to other organizations. When you visit these sites, you will not be subject to this privacy policy, but to that of the external site, if it has one.

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## To whom may SADC disclose your personal information?

Generally, SADC uses your personal information for internal purposes only. The SADC does not sell, rent or share your personal information with third parties for marketing purposes. However, the SADC may communicate, transmit or allow access to your personal information to the following persons or entities:

1. **SADC employees**, if they need access to this information in the course of their duties;
2. SADC **board or committee members** who need access to your data for analysis purposes;
3. **To any other person or entity,** where prescribed or permitted by applicable legislation;
4. **To any other person or entity to** whom you consent to the disclosure of the information, such as financial institutions and the Government of Canada; or
5. **To external service providers** with whom the SADC has entered into a contractual agreement under the terms of which the external service provider may not use the personal information for any purpose other than the provision of said service and must destroy the personal information communicated upon termination of the contractual agreement. (e.g. computer technician, web technician).

The SADC may communicate your personal information to persons or entities in the categories listed above whose head office may be located outside the province of Quebec (e.g. banking institutions, etc.).

**Limits on disclosure and use of personal information**

The personal information collected is destroyed as soon as the purposes for which it was collected have been fulfilled, unless, of course, a law or regulation requires the SADC to retain it or a law or regulation imposes a specific retention period.

The SADC does not sell personal information to third parties and does not provide third parties with access to personal information unless such access is necessary to fulfill one of the purposes identified above and access or disclosure without consent is permitted or required by law or regulation.

All confidentiality settings applicable to your use of the website offer, by default, the highest level of confidentiality, without any intervention on your part.

## How does SADC protect the confidentiality of your personal information?

The SADC takes appropriate physical, technological, contractual and administrative safeguards to protect your personal information and reduce the risk of unauthorized access, use, disclosure or destruction.

### Physical security measures

* Restricted access to premises
* Locking of filing cabinets
* Paper data stored under lock and key

### Technological security measures

* The website is secured using SSL (Secure Socket Layer) protocol;
* All **transfers** of personal information between the various components of the website are **encrypted**;
* SADC's IT service providers are contractually bound to comply with various security obligations, including periodic validation of security practices and processes, as well as **ongoing monitoring of the website's software** components and updates;
* Access to software and applications is **protected** by a password manager;
* Computer workstations are **protected** by dual-factor access and anti-virus software;
* Data is **hosted** on a cloud server with limited access;
* The computer network is protected by a **firewall** with security services.

### Administrative security measures

* An **internal access management policy** for its employees. According to this policy, only our employees who need access to personal information in order to perform their duties have access;
* An **internal information protection policy** for SADC employees to ensure the integrity, availability and confidentiality of personal information;
* A **privacy incident registry**, which helps the SADC make an inventory of incidents, whether minor or major, that affect your personal information in order to ensure that these incidents do not recur and to identify the necessary measures;
* A **personal information retention schedule**, to ensure that personal information is destroyed when it is no longer required for the above-mentioned purposes and the law no longer requires its retention;
* A **privacy incident response plan**, which enables SADC to respond effectively and quickly to breaches of your personal information;
* **Annual training for our staff**.

Despite these measures, the SADC cannot guarantee the security of the personal information entrusted to it. If you suspect that your personal information held by SADC has been compromised, please contact our Privacy Officer at this address, or SADC management at info@sadclaurentides.org.

## What measures has SADC put in place to deal with confidentiality incidents?

The SADC maintains a **privacy incident registry** in compliance with applicable legislation. In the event of a personal information breach that could cause you serious harm, the SADC will take the necessary steps to notify you, in accordance with applicable legislation. The SADC will also take measures to **limit the harm** that may result from the breach and to limit the likelihood of a recurrence.

### How long is your personal information kept?

In accordance with our procedures for the secure retention and destruction of personal information, we will only retain your personal information **for as long as is necessary** for the fulfilment of the stated purposes of this Policy or for as long as is required to comply with our statutory obligations, whichever is the later.

### Destruction of personal information

The SADC has implemented a **document management procedure** to clearly identify the life cycle of data essential to the organization's operations and to ensure that it is destroyed at the end of its useful life. The procedure aims to:

* **Make an inventory** of documents containing personal information;
* Define **confidentiality levels**;
* Identify the types of media and **how they are stored** and destroyed;
* Determine a retention and destruction **schedule**.

## Requests for personal information

* You can consult the personal information we hold about you.
* You can ask us to correct it if it contains an error.
* You must inform us of any changes to your data.

### Request for access

You or a person authorized by the *Act respecting the protection of personal information in the private sector* may make a request for access to your personal information by contacting our Privacy Officer directly in accordance with the procedure set out below. The SADC's Privacy Officer will grant such access unless:

* The law prevents the SADC from granting access;
* The SADC has a serious and legitimate interest in refusing access; or
* Granting access would seriously harm a third party.

In principle, exercising the right of access is free of charge. However, a reasonable fee may be charged to the requestor to offset the costs of transcribing, reproducing or transmitting the personal information. In such cases, the requestor will be notified of the amount of the fee in question before the request is processed.

You may also request a **copy** of the personal information by submitting a written request to the Privacy Officer in accordance with the procedure set out below.

In the event that the SADC agrees to any request for a digital copy of personal information, the SADC will ensure that such copy is provided to the applicant (or any person or organization authorized by law to collect such personal information) in a structured, commonly used technological format. Unless providing such a copy in such a technological format raises serious practical difficulties or the SADC or one of its service providers has inferred or created the personal information.

### Request to correct personal information

We ask you to inform us of any changes that may affect the authenticity or accuracy of your personal information.

You or a person authorized by *Act respecting the protection of personal information in the private sector* may also submit a request for rectification of your personal information.

Such a request will allow you to correct the personal information in our possession if:

* the personal information is inaccurate;
* the personal information is out of date;
* the personal information is ambiguous;
* the personal information is incomplete;
* the personal information has been collected unjustifiably.

Alternatively, you may send a written request for rectification asking our Privacy Officer to destroy personal information that is out of date or has been collected or retained in an unjustified manner. Any request for destruction or correction must be made in writing or via the online form to our Privacy Officer in accordance with the procedure set out below.

### Request for cessation of broadcasting, de-indexing or re-indexing

**The SADC** may also, at the request of the person concerned by the information or any person authorized by law to do so, cease disseminating personal information, de-index or re-index, as the case may be, any hyperlink attached to the name of a person concerned by personal information, subject to the criteria established by the applicable legislation in force at the time. Requests may be made using the online form on our website.

### Request for withdrawal of consent

Subject to your contractual obligations with SADC and applicable legislation, the *Act respecting the protection of personal information in the private sector* (if it applies to you) allows you to withdraw your consent to certain uses or disclosures of personal information. Please note that exercising this right may affect SADC's services to you. As such, if you make such a request, the SADC will identify the consequences of withdrawing consent on services. The request can be made using the online form on our website.

### Request procedures

All requests for access or rectification must be addressed in writing to the management of SADC des Laurentides, our Privacy Officer, or via the relevant online form. A requestor may also contact SADC management directly by sending an e-mail to this address [info@sadclaurentides.org].

The request must be sufficiently detailed to enable our Privacy Officer to assess and identify the personal information covered by the request. Above all, the requestor must ensure that the Privacy Officer can contact him or her so that the Privacy Officer can assist him or her in clarifying the request, in facilitating the identification of the personal information covered by the request and, above all, in communicating the acceptance or refusal of the request, as the case may be.

The Privacy Officer has a duty to process such requests within 30 days. If the request is not processed within the time limit, it is deemed to have been refused.

### Complaint procedure

You may make a complaint about our methods, practices and policies for the protection or governance of personal information by contacting our Privacy Officer directly at this e-mail address: [info@sadclaurentides.org].

The Privacy Officer will respond to the complaint within 30 days of receipt. If the complaint is accepted, a summary of the changes made to our personal information protection or governance methods, practices and policies will be provided to you.

## Modifications to the privacy policy

The SADC may unilaterally change this Privacy Policy. Before implementing any changes, however, the SADC will post a notice on the website identifying the upcoming changes. We therefore invite you to revisit this policy from time to time to check for any modifications. To facilitate this process, we have indicated the date on which this Policy was last updated.

If you have provided us with your e-mail address, you will also receive this or a similar notice by e-mail. Your use of the website, disclosure of your personal information to an authorized SADC agent, or entry of your personal information on an SADC form after receipt of this version will be deemed to constitute acceptance of the changes.

## More information

If you have any questions about any of your rights, if you wish to ask **the SADC** any questions or if you have any comments, please contact the Privacy Officer.

C/O: Sylvie Bolduc, General Manager

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