

Confidentiality Policy
(Hereinafter called "**Policy**")

In Summary:

The SADC Papineau-Collines (hereinafter called "**The SADC**") collects personal information when you interact with an authorized **SADC** representative and through its website <https://www.sadcpapineau.ca/en/> (hereinafter called "**Website**").

Personal information is collected in a variety of ways:

- Automatically when you connect to the website;
- Automatically through the use of cookies or pixels on the website;
- By e-mail;
- By telephone;
- Electronically during job interviews;
- By communicating personal information using regular mail;
- In person; or
- By filling in an application form either on paper or on the website.

The Purpose of Personal Information

Personal information is collected for the following purposes:

- To communicate with job applicants or potential customers and to ensure that communication with them is personalised;
- To advertise to clients or potential clients or job applicants;
- To evaluate job applications;
- To fulfil requests of customers, candidates or visitors to the Website;
- To assess customer needs and interests;
- To ensure that a visitor **can connect to** the Website;
- To ensure that the Website **functions properly**;
- **To evaluate the effectiveness of 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 the personal information of Web Site visitors is subject;
- **To advertise** to potential customers, visitors or job applicants;
- To **comply** with a law, court order or legal process;
- To ensure **legal protection** of the SADC;
- To evaluate and improve **protection** and **security measures**;
- **To prevent or detect fraud**; and
- **To answer complaints, requests for access, rectification or withdrawal of consent.**

Communicating Personal Information

The SADC communicates personal information to:

- its employees should they need access to this information in the course of their duties;
- any other person or entity, where disclosure is required or permitted by applicable law with or without the consent of the individual concerned; and
- 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 to provide the said service and must destroy the personal information communicated no later than the end of the contractual agreement.

Consent

If you continue to use the **SADC** website, if you forward this information to an authorized **SADC** representative, or if you provide personal information to **SADC** by completing a form provided by **SADC**, you are consenting to the purposes and disclosures of personal information set out below and above.

You must consent to the purpose, use and disclosure of your personal information before using the SADC website. Please refer to the document below to identify the circumstances under which information will be collected.

This Policy sets out the measures and practices that 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 individuals who apply for employment with the **SADC** (hereinafter referred to as "**you**" or "**your**"). The **SADC** collects your information through (i) direct or indirect contact with an authorized **SADC** representative or (ii) the <https://www.sadcpapineau.ca/en/> website for the purposes described in Section 1 below.

In this Policy, "personal information" means any information collected by **SADC** which, 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 of:

- 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 personal information and to which third parties, if any, the **SADC** may disclose such personal information;
- the various security measures implemented by the **SADC** to protect the confidentiality of personal information; and
- the rights you have with respect to personal information collected by the **SADC**, in particular the right to access your personal information or request the correction of inaccurate personal information, where applicable.

By submitting one or more pieces of personal information to the **SADC** through (i) direct or indirect contact with an authorized representative of the **SADC** or (ii) your use of the website, you consent to the collection, use, disclosure and retention of such personal information by the **SADC** in accordance with the terms and conditions set out in this Policy.

This Policy and any amended version of this Policy are subject to the laws of the Province of Quebec, Canada.

1. When, how and for what purposes does the SADC collect personal information?

The **SADC** collects personal information in two circumstances: (i) when you voluntarily provide personal information to an authorized **SADC** representative and (ii) when you use the website.

i) Voluntarily provide personal information to an authorized SADC representative

How information is collected

The voluntary transmission of personal information to an authorized SADC representative may be done in various ways, including the following:

- a. By voluntarily answering questions from **SADC** agents who may contact you directly by telephone, in person, by mail or by e-mail;
- b. By providing personal information to **SADC** agents by telephone, in person, by mail or by e-mail;
- c. By providing information to **SADC** agents electronically, by telephone or in person during job interviews; or
- d. By voluntarily completing our job application form (hereinafter called the "**form**") if you wish to apply for a job with the **SADC**.

What personal information does the SADC collect through its authorized representatives?

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

- Your last name, first name, preferred language and some of your contact information (telephone number, e-mail address, etc.);
- As part of a job application, information relating to your level of education or training (year of graduation, information relating to primary, secondary, college or university studies, etc.);
- As part of a job application, criminal record;
- In the case of a job application, the position applied for (whether the position applied for is regular, part-time or a student job);
- In the case of a job application, your previous employment and work experience;
- Financial information when this is necessary for the completion of a transaction in which the person concerned by the personal information wishes to participate; or
- In the context of a job application, the personal information provided on your curriculum vitae that we would need to collect in order to assess an application.

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

What is the purpose of the personal information collected by SADC agents?

The **SADC** collects personal information through the use of its agents for a number of purposes:

- **Communicating** with job applicants or potential customers and ensuring that communication with them is personalized;
- **Advertising** to customers, visitors or potential job applicants;
- **Evaluating job applications**;
- **Responding** to your requests;
- **Assessing** your **needs** and **interests**;
- Ensuring **compliance** with a law, court order or legal procedure;
- Ensuring **SADC's legal protection** in the event of a dispute;
- Evaluating and improve protection and **security** measures;
- **Preventing or detecting fraud or illegal acts**; and
- Responding to **complaints and requests for access, rectification or withdrawal of consent**.

ii) Collection of personal information when you use the website.

How information is collected

When you visit our website, your personal information is collected in various ways:

- Automatically through **your connection to the Website** (your computer and the Website server automatically exchange personal information when you connect);
- Automatically through the installation of **temporary cookies and the use of pixels** on your computer;
- Automatically through the use of our logging processes;
- Through your e-mail communications (if you communicate personal information to us by e-mail); and
- As a result of the information you enter in the forms available on our Website.

What personal information does the **SADC** collect?

The SADC may collect the following information:

a. Information collected automatically:

When you visit our website, personal information is collected automatically:

- 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.

b. Information pertaining to a job application:

If you fill in our job application form available at: <https://emplois.ca.indeed.com/cmp/Sadc-De-Papineau--collines/jobs> you will need to provide us with the following information:

- Your surname, first name, preferred language and specific contact information (telephone number, e-mail address, etc.);
- Information about your level of education or training (primary, secondary, college or university education, etc.);
- The job or position you are applying for;
- Your criminal record;
- Your previous employment, work experience and qualifications;

- In the case of a job application, the personal information provided on your curriculum vitae that is required to assess your application; and
- If you have a car and a drivers licence.

c. 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 exchange.

Please note that the personal information entered in your exchanges and your communication 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 valid photo identification and your name. All other personal information contained in such identification may be concealed.

To what end does the **SADC** collect personal information?

The SADC collects your personal information for the following purposes:

- To ensure that a visitor to the Website can log on to the Website;
- To ensure that the Website can function properly;
- To evaluate the effectiveness of SADC's efforts to generate 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 customers and ensure that communication with them is personalised;
- To advertise to potential customers, visitors or job applicants;
- To assess customer needs and interests;
- To assess the quality of job applications;
- To ensure compliance with a law, court order or legal procedure;
- 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 prevent or detect fraud; and
- To respond to complaints, requests for access, rectification or withdrawal of consent.

Links to other websites

The Website sometimes provides links to other websites belonging to other organisations. When you visit these sites, you will not be subject to this privacy policy, but to that of the external site, should it have one.

2. To whom may the SADC communicate your personal information?

Generally speaking, the **SADC** uses your personal information solely for internal purposes.

However, the **SADC** may communicate, transmit or allow access to your personal information to the following persons or entities:

- a. **SADC** employees, if they need access to this information in the course of their duties;
- b. To any other person or entity, when prescribed or permitted by applicable legislation;
- c. To any other person or entity to whom you consent to the disclosure of the information; or
- d. To external service providers with whom the **SADC** has entered into a contractual agreement under which the external service provider may not use the personal information for any purpose other than to provide the said service and must destroy the personal communicated information upon termination of the contractual agreement.

The **SADC** may disclose your personal information to persons or entities described above **located outside the province of Québec**.

3. Limitations on the 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.

4. How does the SADC protect the confidentiality of your personal information?

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

Without limiting the generality of the above, the website is equipped with certain security mechanisms designed to protect your personal information:

- Personal information collected on the Website is **encrypted at rest**;
- All **transfers** of personal information between the various components of the Website are **encrypted**; and
- The **SADC's** IT service providers are **contractually bound to comply with various security obligations**, including periodic validation of security practices and processes and continuous monitoring and updating of the Website's software components.

In addition to these measures, **SADC** also provides for, (but is not limited to) the following:

- 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 may access it;

- An **internal policy for the protection of information** to which **SADC** employees are subject in order to ensure the integrity, availability and confidentiality of personal information;
- A **register of confidentiality incidents**, which helps the **SADC** generate 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 calendar**, 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;
- A **logging of access** to your personal information; and
- **Annual staff training**.

Despite these measures, **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 mebergeron@sadc papineau.ca.

5. What measures has the SADC implemented in order to deal with confidentiality incidents?

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

6. How long do we retain your personal information?

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 to fulfil the purposes listed in section 1 of this Policy or for as long as is required to comply with our statutory obligations, whichever is the later of the two.

7. Requests Relating to Personal Information

i) Access Requests

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. **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 applicant to offset the costs of transcribing, reproducing or transmitting the personal

information. In such cases, the applicant will be notified of the amount of the fee in question before the request is processed.

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

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

ii) Request for Rectification

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 the Privacy Act 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; or
- The personal information collected was unwarranted.

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 to our Privacy Officer in accordance with the procedure set out below.

iii) Request for cessation of dissemination, 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, 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.

iv) Request for the Withdrawal of Consent

Subject to your contractual obligations with **SADC** and applicable legislation, the *Privacy Act* 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, **SADC** will identify the consequences of the withdrawal of consent of the services.

8. Request Procedure

All requests for access or rectification must be addressed in writing to Mélissa Bergeron, our Privacy Officer. A requestor may contact her directly by sending an e-mail to this address mebergeron@sadcpapineau.ca.

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 is able to 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 is obligated to process such requests within 30 days. If the request is not processed within the time limit, it is deemed to have been refused.

9. Complaint Procedure

You may file a complaint about our personal information protection or governance methods, practices and policies by contacting our Privacy Officer directly at this e-mail address: mebergeron@sadcpapineau.ca.

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

10. Changes to the Privacy Policy

SADC may unilaterally change this Privacy Policy. Prior to implementing any changes, however, **SADC** will provide notice on the Web Site identifying the upcoming changes. We therefore invite you to revisit this policy from time to time to check for any changes. 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 notice or a similar one by e-mail. Your use of the Website, disclosure of your personal information to an authorized officer of **SADC**, or inclusion of your personal information on a **SADC** form after receipt of this version will be deemed to constitute acceptance of the changes.

11. Other

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

A/S: Mélissa Bergeron, responsible for the protection of personal information
La SADC Papineau-Collines
565 avenue de Buckingham, Gatineau (QC) J8L 2H2
E-mail: mebergeron@sadcpapineau.ca

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