# **CPIVAS**

# **Personal Information Protection and Privacy Policy**

CPIVAS is committed to respecting your privacy and protecting the personal information you share with us.

- You are not required to disclose personal information to use our website.
- We do not retain any personal information that you voluntarily provide to us for purposes other than those for which it was collected. (For example, you might provide us with personal information by making a donation or subscribing to a newsletter.)
- We do not sell, trade or distribute your personal information to third parties.
- This website contains links to external sites. Please note that we are not responsible for the privacy practices of other sites. We encourage you to read the Privacy Policy of any website you visit.

Our detailed privacy policy, below, explains how we respect your privacy and protect your personal information.

# **CPIVAS Privacy Policy**

At CPIVAS, respect for privacy and the sensitivity of information is an integral part of our commitment to our members, donors, and partners. The CPIVAS privacy policy aims to promote responsible and transparent practices in the management of personal information, in accordance with the provisions of the Act to modernize legislative provisions as regards the protection of personal information. This law also applies to community organizations.

# 1. Scope of the policy

This policy concerns the processing of personal information that you provide to us in the context of our activities and our service offering. More specifically, it describes how information is collected, used, stored securely, and then properly destroyed.

# 2. Purpose of collecting personal information

CPIVAS collects personal information for the following limited purposes:

- 1. For administrative or management needs;
- 2. To issue tax receipts for charitable donations;
- 3. To meet government reporting requirements;

4. To create and maintain contact and mailing lists.

# 3. Retention of personal information

We do not sell, trade or distribute your personal information to third parties. CPIVAS retains personal information in accordance with the requirements of the Act on the Protection of Personal Information in the Private Sector.

# 4. Hyperlinks

This website contains links to external sites. Please note that CPIVAS is not responsible for the practices of other sites relating to privacy. We encourage you to read the Privacy Policy of any website that collects personal information. This policy applies only to CPIVAS.

#### 5. IP Address

Like most websites, our server logs your IP address. We do not seek to establish a link between your IP address and your personal identity. Instead, we use aggregated IP address data to obtain broad demographic and geographic information about the use of our website.

# 6. Application of the CPIVAS Model Code on the Protection of Personal Information.

CPIVAS applies the following principles:

# A. Liability

The CPIVAS is responsible for the personal information that it collects and stores, and which is under its control. To fulfill this responsibility:

- 1. We have designated a person responsible for maintaining and controlling personal information: the confidentiality officer.
- 2. CPIVAS has adopted the following measures to ensure compliance with this Privacy Policy:
  - Development of procedures for requesting access to personal information and handling complaints.
  - Development of procedures for retaining and destroying personal information.
  - Development of procedures for managing security incidents and personal information breaches.

- Development of procedures for requesting de-indexing and deletion of personal information.
- Development of procedures for managing members of the work team.
- Development of a confidentiality incident reporting form.

# **B.** Determination of purposes

CPIVAS is committed to transparency towards you regarding its practices for collecting and using personal information. We collect and use personal information only for the purposes stated above.

As a guarantee of this transparency, we request the consent of our constituents and subscribers to our mailing lists before using their personal information for purposes other than those identified during initial collection.

#### C. Consent

CPIVAS is committed to keeping you informed of how your personal information is used. We ensure that we obtain consent from individuals who provide us with personal information. To do this, all of our employees are advised to provide explanations to anyone who asks how we use personal information, and to obtain consent from those who choose to entrust us with personal information. Your consent may be verbal or written.

In addition, we may occasionally ask you to confirm in writing that the personal information we have about you is up to date and accurate. We may also verify that you still consent to the use and retention of your personal information.

CPIVAS may disclose your personal information without notice only if required by law or in the good faith belief that it is necessary to:

- Comply with obligations imposed by a law or regulation.
- Respond to an emergency need; and or
- Respond to a request related to a criminal investigation.

#### D. Limitation of collection

CPIVAS limits its collection of personal information to only those elements necessary for the aforementioned purposes. We are committed to collecting personal information in a fair, open and lawful manner. This is why CPIVAS does not randomly collect personal information. We collect personal information for the purposes set out above only, and for no other purpose.

### E. Limitation of use, disclosure and retention

CPIVAS does not use personal information for purposes other than those identified during initial collection, unless authorized by the individual concerned. We retain personal information for as long as necessary or as permitted by law, and only for the purposes identified during initial collection.

# F. Accuracy

CPIVAS is committed to maintaining accurate, complete and up-to-date personal information. If the information you have provided to us has changed, please notify us so that we can update our records.

You can verify and correct your personal information by contacting our <u>Privacy</u> Officer.

# **G.** Security measures

CPIVAS has developed and implemented security measures adapted to the sensitivity of the personal information it stores. These measures include:

- Physical security measures such as restricted access to places where personal information is stored; And
- Internal security measures, including restricted access to computers, confidentiality agreements with employees and restricted access to locations where personal information is stored.

If we use the services of a third party to process personal information, we will enter into a legal agreement with them requiring them to protect this information in a manner acceptable to us. Such an agreement does not serve to transfer to the third party any interests related to the use of the information. Rather, it aims to ensure that personal information provided to the third party is protected to a level of security equivalent to that of this Privacy Policy.

If we collect your personal information or that of a third party, we will have obtained the necessary consent or we will do so in another manner permitted by law. Third parties include, for example, service providers, referrals and others we need to contact for our services; to establish, manage or terminate an employment relationship; or for administrative or management purposes.

We also ensure that our employees who handle personal information receive adequate training and know the essential measures to protect this information. Any personal information we hold is destroyed when it is no longer necessary for the purposes for which it was collected, unless you have authorized us to retain it or the law requires it.

# H. Transparency

CPIVAS makes available to all interested parties information on its policies and practices related to the collection and retention of personal information. We will be happy to answer any questions on this subject; Please address your letter or email to our <u>Privacy Officer</u>.

# I. Access to personal information

You have the right to access the personal information we hold about you. However, we reserve the right to verify the identity of the person making such a request, before disclosing any information to them. Please address your letter or email to our <u>Privacy Officer</u>.

On request, we can tell you whether we hold personal information about you and, if so, what it consists of.

If we are unable to disclose to you all the personal information we hold about you, the reasons will be explained to you.

# J. Dispute

As we have mentioned, CPIVAS has assigned an employee to maintain and control personal information: the <u>confidentiality officer</u> will receive and respond to any request for information regarding our privacy policies or the personal information we have about you.

To add or remove your name from the CPIVAS contact lists, please send a letter or email to the list manager <a href="mailto:reception@cpivas.com">reception@cpivas.com</a>.

We will investigate any complaint made to us and respond in writing within a reasonable time. If a complaint proves to be justified, we will take the necessary means to remedy the situation in a manner satisfactory to each person.

# K. How to add, remove or modify your personal information

At any time, if you wish to modify the personal information we have about you or remove your name from our mailing lists, please notify us in writing at the postal or electronic address below:

Monique Villeneuve, Privacy Officer administration@cpivas.com
Postal Box 27543, Franchise Pont-Viau Laval (Quebec) H7G 4Y1

# **Contents of our website**

CPIVAS maintains and exercises complete editorial control over the content of its website. Links to other websites are provided for the information of Internet users only. When an Internet user clicks on a link to an external website, they leave the CPIVAS website and, therefore, the applicable privacy and security policies are those of the owners of the external site.

CPIVAS does not exercise control and does not offer any guarantee as to the degree of timeliness, accuracy, relevance or completeness of the information provided on the linked external websites.