



PRIVACY AND CONFIDENTIALITY POLICY

La Maison d'Ariane

Adopted by the Board of Directors on October 5, 2023

CONTENTS

- Document history3
- Purpose3
- Scope of application.....3
- Application of the policy3
- Roles and responsibilities of team members.....4
- Our undertaking.....4
- 1. Protect any personal and confidential information collected and under its control.....4
- 2. Notify the person concerned that personal information is being collected, at the time it is collected.....5
- 3. Collect only such information as is necessary and required.....5
 - Information on our clients.....5
 - Information on employees and candidates5
 - Information on interns, contractors and volunteers.....6
 - Donor information6
- 4. Obtain consent when collecting, using or sharing personal information when required6
- 5. Keep your personal information only as long as is necessary for the specific purpose6
- 6. Protect personal information using appropriate measures.....7
- 7. Inform individuals of the personal information we have about them, upon request.....7
- 8. Deal with complaints swiftly and confidentially8
- Use of cookies9

DOCUMENT HISTORY

Created	August 2023
Version 1.0	October 2023

PURPOSE

The purpose of this policy is to promote the responsible handling and management of personal information in accordance with the *Privacy Act*.

Specifically, the purpose of the Privacy Policy is to inform you of the ways in which *La Maison d'Ariane* is committed to keeping the personal information it collects confidential. The Policy also explains the process we have put in place to deal with privacy complaints and confidentiality incidents.

SCOPE OF APPLICATION

This Policy applies to personal and confidential information that is collected, used, kept or shared by *La Maison d'Ariane*. The information we hold pertains mainly to the organization's activities as well as our donors, clientele, Board members, staff members, individual members, and volunteers.

This Policy applies to any person involved with our organization, including women, children, directors, donors, staff members, volunteers, partners and any other person who may be on site at *La Maison d'Ariane's* different locations.

It also applies to our dealings with third parties and service providers that handle confidential information on behalf of *La Maison d'Ariane*.

APPLICATION OF THE POLICY

The Privacy Officer and Board of Directors are responsible for the application of this Privacy Policy.

Administrators, management, employees, interns and volunteers must sign a confidentiality agreement as soon as this Policy takes effect.

Anyone who violates the Policy will be subject to disciplinary measures considered appropriate by *La Maison d'Ariane*, which may include dismissal or exclusion.

This Policy takes effect on September 22, 2023, and has been posted on our website.

ROLES AND RESPONSIBILITIES OF TEAM MEMBERS

Each member of the *La Maison d'Ariane* team has signed an agreement as part of their employment contract, undertaking to keep confidential any personal information collected by them or by any other person. They have also undertaken to respect the Privacy Policy.

The *La Maison d'Ariane* Privacy Officer is the person appointed in writing by the Board of Directors.

Their responsibilities include:

- Ensuring that measures are taken to collect, protect and destroy personal information
- Responding to requests to access, correct and disclose to third parties' personal information
- Receiving confidentiality complaints and incidents, documenting them and ensuring they are processed
- Maintaining a log of confidentiality incidents.

OUR UNDERTAKING

La Maison d'Ariane undertakes to:

1. Protect any personal and confidential information collected and under its control;=
2. Notify the person concerned that personal information is being collected, at the time it is collected
3. Collect only such information as is necessary and required
4. Obtain consent when collecting, using or sharing personal information when required
5. Keep your personal information only as long as is necessary for the specific purpose
6. Protect personal information using appropriate measures
7. Inform individuals of the personal information we have about them, upon request
8. Deal with complaints swiftly and confidentially.

1. PROTECT ANY PERSONAL AND CONFIDENTIAL INFORMATION COLLECTED AND UNDER ITS CONTROL

La Maison d'Ariane is responsible for the personal information it holds and controls. *La Maison d'Ariane* will implement appropriate measures to provide a comparable level of protection when such information is processed by a third party. *La Maison d'Ariane* has established policies and procedures to protect personal information. *La Maison d'Ariane* has appointed a Privacy Officer to oversee privacy issues encountered at *La Maison d'Ariane*. We have also trained our employees on our privacy policy and their role in protecting personal information.

2. NOTIFY THE PERSON CONCERNED THAT PERSONAL INFORMATION IS BEING COLLECTED, AT THE TIME IT IS COLLECTED

When collecting personal information, *La Maison d'Ariane* will inform you verbally, in writing or by email of the reasons for its collection, what we intend to do with your information and the persons with whom we may share it.

Except where required or permitted by law, *La Maison d'Ariane* will not disclose, without your consent, information for purposes other than those for which it was collected. Personal information is only shared with those who need it to perform their duties.

3. COLLECT ONLY SUCH INFORMATION AS IS NECESSARY AND REQUIRED

La Maison d'Ariane limits the collection of personal information and will only ask for information that is reasonably required for its operations, activities and services. The personal information we collect is solely information considered necessary for the purpose of the case. All information is treated confidentially.

Information on our clients

La Maison d'Ariane collects, uses, keeps and discloses information about its clients for the following purposes:

- Establish and maintain support relationships
- Understand needs and preferences
- Offer support services and accommodation appropriate to each client's situation
- Protect individual safety

Information on employees and candidates

La Maison d'Ariane collects personal information about employees to pay their salaries, comply with applicable legislation, provide benefits, use performance management tools and improve or manage employee programs, policies and relations, for emergency preparedness purposes, and generally to establish, manage or terminate the employment relationship.

La Maison d'Ariane also collects personal information about individuals seeking employment with *La Maison d'Ariane* to select candidates and ensure that qualified people are hired for the appropriate positions.

When necessary, personal information collected by *La Maison d'Ariane* may be transferred to our insurance and benefits providers, pension plan administrators and any other company involved in contractual activities on our behalf. Personal information will also be used only for the purposes for which it was collected.

Information on interns, contractors and volunteers

La Maison d'Ariane collects personal information on interns, contractors and volunteers. This information is needed to manage the internship, business contract or volunteer relationship.

Donor information

La Maison d'Ariane attaches great importance to the trust of its donors. Therefore, it does its best to limit the collection and use of donors' personal information and to protect their privacy. No information is disclosed without the consent of the donor.

4. OBTAIN CONSENT WHEN COLLECTING, USING OR SHARING PERSONAL INFORMATION WHEN REQUIRED

Consent to the collection, use, and retention of personal information is generally implied at the time of collection. Signing a contract, requesting assistance or accommodation, or a donation are all considered tacit consent to collect and use the information needed to create a file.

However, where the information collected is sensitive in nature, specific consent will be sought, clarifying the reasons for collection. Information can only be collected for these reasons. If collected for another reason, the person's consent will be obtained again. Consent is only valid for the time necessary to carry out the activities for which the personal information was collected. *La Maison d'Ariane* will consider the sensitivity of personal information when choosing the format and method for obtaining consent.

Personal information about a minor under the age of 14 will be collected from the minor with the consent of the legal guardian, except where such collection is clearly for the benefit of that minor.

La Maison d'Ariane will ask for your consent before disclosing your personal information to a third party, except in cases provided by law. When an employee accepts an offer of employment or benefits, such acceptance generally constitutes consent authorizing *La Maison d'Ariane* to collect, use and disclose personal information for all identified purposes.

Persons who give consent may withdraw it at any time by submitting a written request, if the consent was given in writing; otherwise, a verbal request will be sufficient.

5. KEEP YOUR PERSONAL INFORMATION ONLY AS LONG AS IS NECESSARY FOR THE SPECIFIC PURPOSE

La Maison d'Ariane will retain personal information only as long as necessary for the identified purposes, or as required or permitted by law.

6. PROTECT PERSONAL INFORMATION USING APPROPRIATE MEASURES

Personal information can be stored in various media, in paper or digital files, and access is secure. In all cases, the information will only be accessed by persons within *La Maison d'Ariane* with the appropriate authorization. The information must be necessary for them to perform their duties.

La Maison d'Ariane will protect personal information by taking appropriate security measures against the risk of loss, theft, or the unauthorized access, disclosure, copying, use, modification or destruction, regardless of retention format. We consider the level of sensitivity of the information when determining the level of protection required. *La Maison d'Ariane* will carefully destroy personal information to prevent unauthorized access. In the event of a security breach, we will endeavour to limit any potential harm.

All employees accessing personal information will be required to keep such information confidential and private.

La Maison d'Ariane will protect personal information that is transferred to third parties under contractual agreements that stipulate that the third party must respect the confidentiality of personal information and comply with all legal requirements.

La Maison d'Ariane does business with technology service providers to store personal information and has obtained from them an undertaking to ensure that information is protected and kept confidential. This undertaking was included in the contract signed with its providers. Providers must also specify in their contract the means they have taken to protect personal information and ensure that it will only be used in the performance of the contract.

La Maison d'Ariane has also included a provision in contracts with its technology service providers that it be notified of any privacy incident involving personal information it has collected.

7. INFORM INDIVIDUALS OF THE PERSONAL INFORMATION WE HAVE ABOUT THEM, UPON REQUEST

Upon request, *La Maison d'Ariane* will allow the individuals concerned to review the personal information *La Maison d'Ariane* has about them. Any request for personal information by a person concerned must be sent in writing to *La Maison d'Ariane*. The request must specify the information requested, the name and contact information (mailing address, email and telephone) of the person making the request, and proof of identity. Requests may also be made to correct or delete information.

Upon request, accessibility measures will be taken to ensure that persons with disabilities can exercise their right to access or correct their personal information.

La Maison d'Ariane will respond diligently within 30 days of the date of receipt of the request.

Any request for disclosure of personal information from a third party must also be made in writing. In most cases, *La Maison d'Ariane* will obtain the written consent of the person concerned before disclosing personal information to a third party. *La Maison d'Ariane* may also disclose personal information without the consent of the individual when required to do so by law. In such cases, it will ensure that it discloses only the personal information required by law and by the circumstances of the request for disclosure.

In some cases, *La Maison d'Ariane* may be unable to provide access to all personal information stored about an employee, a woman or a child. For example, *La Maison d'Ariane* will not provide access where it may reveal personal information about a third party, unless the requested information can be separated from the file or if the third party consents to the disclosure of their information. Other grounds for denying access may include, but are not limited to, situations where disclosure may reasonably endanger the life, health or safety of another person, information protected by attorney-client privilege, or communications that could reveal information collected during an investigation or in violation of an agreement or of a law. When access to an individual's information is denied, *La Maison d'Ariane* will provide the reasons for such denial.

You can also request that *La Maison d'Ariane* make changes to personal information if this information is outdated, inaccurate or incomplete. *La Maison d'Ariane* will promptly amend personal information that is inaccurate or incomplete. Any unresolved discrepancies in the accuracy of personal information will be noted in the individual's file.

8. DEAL WITH COMPLAINTS SWIFTLY AND CONFIDENTIALLY

Complaints relating to this policy or to privacy more generally must be made in writing and include the individual's name, contact information and the reason or reasons for the complaint.

Complaints are to be directed to *La Maison d'Ariane's* designated Privacy Officer.

La Maison d'Ariane undertakes to handle the complaint confidentially and to respond to it no later than 30 days from the date of receipt of the complaint, provided that it has obtained all the information necessary to adequately process the request.

The Privacy Officer must also investigate when a privacy incident occurs and notify the person(s) concerned and the *Commission d'accès à l'information* (Access to Information Commission) without delay, if applicable, i.e., if the incident presents a risk of serious harm. Moreover, it has the responsibility to identify reasonable measures to reduce the risk of harm to the individuals concerned and to prevent further incidents of the same nature.

USE OF COOKIES

This site does not place permanent cookies on the hard drives of visitors' computers, but only a temporary cookie required to improve the performance of certain features of the website.