

ACTION CENTRE - PRIVACY POLICY

Action Centre (AC) is committed to respecting your privacy. This Privacy Policy (the "Policy") is designed to inform you of Action Centre's commitment to privacy and the protection of personal information. It is intended to help you better understand AC's practices regarding the collection, use, disclosure, and retention of your personal information.

The Policy applies to personal information that AC collects and holds about you, i.e., information that makes it possible, directly, or indirectly, to identify you.

Also consult:

- Cookie Usage Policy (coming soon)
- Cookie management tool (coming soon)
- Terms of use | Privacy policy (coming soon)

1. COLLECTION AND USE OF PERSONAL INFORMATION

1.1 Means by which personal information is collected.

Personal information collected by the AC is provided to us directly by you, either verbally or by filling in blank fields on various Web pages or forms, including, but not limited to, when:

- you use our websites, applications or transactional platforms
- contact our office by telephone or e-mail
- visit the AC, take part in certain activities
- browse our Website using cookies
- complete surveys, studies, or participation forms
- sign up for e-mail communications and newsletters
- contact us with a comment, question or complaint, or when an event or incident occurs at one of our facilities
- you submit a job application

1.2 Consent

The collection of certain personal information is subject to specific consent. AC undertakes to use only the personal information that is necessary and for the purposes for which it was collected. If AC wishes to use your personal information for a purpose other than that described in the Policy, we must obtain your prior consent.

If you decide to refuse or withdraw your consent to the collection, use or sharing of your personal information, the CA will send you the relevant information explaining the consequences of such withdrawal. Please note, however, that if you refuse to allow the CA to collect certain essential personal information (such as your contact information), we may not be able to provide you with the services you have requested.

1.3 Managing your preferences

At any time, you may also contact AC to update your personal information, to modify or delete certain information by sending an e-mail to programme@centreaction.org

1.4 Categories of personal information: AC has grouped the personal information it may collect from you into categories, along with the purposes for which it is collected¹.

ACTION CENTRE - PRIVACY POLICY

Categories of personal information	Examples of personal information
1. Identification information	<ul style="list-style-type: none"> • Name and surname • Electronic and postal address • Phone number • Spoken language
2. Information about your communication preferences and usage	<ul style="list-style-type: none"> • Name and the civic address of the residence • Phone number • Emergency contact
3. Payment information	<ul style="list-style-type: none"> • Social insurance number (employment cases) • Billing information
4. Information when an event or incident occurs (injury, accident, etc.)	<ul style="list-style-type: none"> • Age • Gender • Spoken language(s) • Description of the physical and/or psychological condition • Medical history • Other relevant information about the event or incident
5. Information regarding a question, comment, or complaint	<ul style="list-style-type: none"> • Information you share with us about your question, comment, or complaint
6. Information when applying for a position on the Board of Directors	<ul style="list-style-type: none"> • Your CV, including the personal information you include in it

¹ Please note that if certain categories do not apply to you, the CA does not collect the personal information associated with them. In addition, several categories of personal information may apply.

1.5. Access to your personal information

Personal information collected by AC is accessible to our employees or representatives who require it in the performance of their duties. Employees or representatives must at all times ensure its confidentiality and must regularly undergo training and awareness activities in security and protection of personal information.

2. DISCLOSURE OF PERSONAL INFORMATION : AC may share your personal information with third parties, service providers, or partners as part of its activities and mission.

2.1. Disclosure to the responsible ministry

AC may disclose your personal information to the Ministère de la Santé, the Ministère de l'Emploi et de la Solidarité Sociale (for certain programs) and / or the CIUSSS.

2.2. Disclosure to our suppliers and partners

AC may communicate your personal information to its service providers or partners.

ACTION CENTRE - PRIVACY POLICY

Certain communications require your consent. However, certain personal information may be communicated to suppliers without your consent, when such communication is necessary for the performance of a mandate, or the performance of a service contract entrusted by AC. These suppliers use your personal information only to provide the selected services, related to the purposes described in this Policy.

For example, AC may share your personal information with the following providers:

- Service providers for payment processing;
- Providers for communications, e-mail and cookie management;
- Service providers for our marketing needs;
- Providers of activities in the establishment;
- Providers of satisfaction surveys and other studies;
- Providers of IT services and products;
- Cloud computing, web hosting, and data processing;
- Legal service;
- Talent acquisition software providers;
- Service providers for customer relationship management (handling complaints, comments, or questions).

When AC communicates your personal information to these providers, it ensures that the contracts include the necessary protective clauses to ensure the confidentiality of your personal information.

2.3. Disclosure to authorities and other organizations

In certain situations, AC may be required to disclose your personal information without your consent, specifically in the following cases:

- To regulatory authorities, government departments or agencies who request it under powers granted by law or when the information is required for the application of a law;
- To police forces if the information is required for an investigation they are conducting, or if the information is the subject of a search warrant or a production order;
- To the extent provided or required by law, in accordance with the Law of respecting access to documents held by public bodies and the protection of personal information.

3. RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

3.1. Retention of personal information

Personal information held by AC is stored on secure servers usually located in Canada. However, AC may retain the services of providers located outside the country.

AC keeps your personal information secure for as long as it uses it to carry out its activities, accomplish its mission and offer you its services. These time periods are provided in particular to allow AC to comply with certain legislative or regulatory requirement or to produce this information as evidence, in the event AC is party to a claim or lawsuit.

ACTION CENTRE - PRIVACY POLICY

3.2. Destruction of personal information

Once personal information has reached the end of its intended lifespan, AC ensures that it is destroyed or anonymized. Destruction or anonymization is carried out in a secure manner, in accordance with the best applicable practices.

4. MEASURES OF PROTECTION OF PERSONAL INFORMATION

AC is responsible for protecting the personal information it holds. It implements security measures to ensure the protection of your personal information collected, used, communicated, stored, and destroyed. In particular, AC has implemented the following protective measures:

Physical protection measures	<ul style="list-style-type: none"> • Surveillance cameras • On-site staff • Cabinet locks • Alarm system • Access barrier
Computer protection measures	<ul style="list-style-type: none"> • Securing all IT components (desktops, servers, networks, etc.) according to the best market practices • Passwords on all desktops for access to all information, locally and remotely • Multi-factor authentication • Access management • Monitoring and control to prevent and detect suspicious activity
Employee-related protection measures	<ul style="list-style-type: none"> • Code of ethics and professional conduct • Process for managing confidentiality and security incidents

5. REQUEST FOR ACCESS AND RECTIFICATION OF YOUR PERSONAL INFORMATION

You may at any time contact the persons responsible for access to documents and protection of personal information, for any request for access to information concerning documents held by AC or concerning your personal information.

You can consult the personal information that AC has collected about you, and ask us to update or correct it. To do so, you may send your request in writing to the persons responsible for the application of the Act respecting access to documents held by public bodies and the protection of personal information at the AC:

Mojgan Yazdani, Executive Director

Action Centre

124 - 2169 Blvd. Marcel-Laurin, Saint-Laurent, Québec, H4R 1K4

6. HANDLING OF COMPLAINTS AND QUESTIONS

In an effort to constantly improve the quality of its services, AC gives great importance to complaints and comments from its members. To formulate a complaint relating to the protection of personal information, we invite you to write to the following e-mail address: info@centreaction.org.



ACTION CENTRE - PRIVACY POLICY

For more information on our complaint handling process, please see our Privacy Governance Rules (coming soon).

If you have any questions about this Policy or our personal information handling practices, you can contact us by e-mail or mail at the following coordinates:

Action Centre

124-2169 Blvd. Marcel-Laurin, Saint-Laurent, Québec H4R 1K4

info@centreaction.org

7. MODIFICATION OF THE POLICY

Action Centre reserves the right to modify the Policy at any time to reflect significant changes in its internal and external environment. AC will notify you in advance of any significant changes.

Changes are effective as of the update date indicated below.

We invite you to consult the Policy regularly to ensure that you are aware of the most recent version.

Last Policy update: May 15, 2024