

CPE Vanier

Privacy policy
(QC: law 25)



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PREAMBLE

This "Privacy Policy" (hereinafter the "Policy") is adopted pursuant to the [*Act respecting the protection of personal information in the private sector, c. P-39.1*](#) (hereinafter the "*Private Sector Act*").

CPE Vanier is a non-profit legal entity that processes personal data as part of its activities. It is therefore subject to *private law*.

In the course of its activities, the CPE must collect, use and retain personal information in accordance with the *Act respecting educational childcare services*, the *Regulation respecting educational childcare services*, the *Regulation respecting reduced contributions and the directives and instructions of the Ministère de la Famille* (hereinafter the "MF").

This policy applies to the CPE, including its staff members, members of the Board of Directors, interns and volunteers, parent-users and children, as well as any person providing services on behalf of the CPE.

The Privacy Policy, hereinafter referred to as the "Policy", refers to our practices regarding the collection, use, retention and processing of your personal information when you use our sites, products and services. It also defines your rights regarding the possession of your information.

DEFINITIONS

"Personal information" is defined as any information relating to a natural person which makes it possible, directly or indirectly, to identify that person. It applies to all personal information collected, used and stored by CPE.

The "Site" refers to the website operated by CPE Vanier, its sub-domains and its content.

"Products" are software and applications that you can access, install and download from our site.

The term "services" refers to the day-to-day care we provide for your children.

If you do not agree with any part of this policy, please do not use or access our sites, products and services.

This policy covers personal information contained in all types of physical or digital documents, in the broadest sense of the term, whether written, graphic, sound, visual, computerized or other.

It also applies to the CPE website, where applicable. The appendices at the end are an integral part of the policy.

1. OBJECTIVES

This policy describes the standards for collecting, using, communicating and retaining personal information in order to ensure its protection. It also explains the roles and responsibilities of CPE staff members throughout the personal information life cycle

information, as well as a procedure for handling complaints concerning the protection of personal information.

2. PERSONAL INFORMATION

In the course of its business, CPE Vanier may collect and process various types of personal information, including, but not limited to:

- Information relating to identity, such as first or last name, age, date of birth, etc;
- Contact details, address, e-mail address and telephone number;
- Information required when registering a child at the CPE, such as the registration form, service agreement, social insurance number, bank account information for pre-authorized debits, etc;
- Information needed to compile the file of parents applying for the reduced contribution, such as the application for the reduced contribution, the parent's certificate, documents establishing Canadian citizenship and the child's birth certificate or birth record, government correspondence with the parent, etc;
- Information required during the child's attendance, including, but not limited to, attendance records, incident reports, medication administration documents, parents' instructions regarding their child's dietary restrictions, if any, etc ;
- Information needed to compile the child's school file, including progress reports, professional reports on children with special needs, etc;
- Information relating to CPE staff members, trainees or volunteers, including personal files, training certificates, documents relating to the verification of impediments, etc;
- Any other personal information required for its activities.

3. COLLECTION

CPE Vanier collects personal information about parents, children, volunteers, students and staff. In general, information is collected directly from the individual AND with the individual's prior knowledge and consent, unless an exception is provided by law.

Consent may be implicit in certain situations, for example when an individual decides to provide his or her personal information voluntarily in the context of CPE activities, such as registering a child or getting hired.

In all cases, CPE will only collect personal information if it has a valid reason to do so. Furthermore, the collection of personal information will be limited to that which is necessary to achieve the purpose for which it is collected.

Unless otherwise provided by law, the CPE will seek the consent of the person concerned before collecting personal information about him or her from a third party.

4. USE

CPE Vanier undertakes to use personal information in its possession only for the purposes for which it was collected and for which it is authorized by law to use it. CPE Vanier may, however, collect, use or disclose personal information without the consent of the person concerned, where permitted or required by law.

In certain circumstances, CPE may collect, use or disclose personal information without the knowledge or consent of the individual concerned. These circumstances may arise when, for legal, medical or security reasons, it is impossible or unlikely to obtain consent, when such use is clearly in the interest of the person concerned, when it is necessary to prevent or detect fraud, or for any other serious reason.

CPE Vanier limits access by staff, members of the Board of Directors and other sources (e.g. auditors, government offices, resource personnel, etc.) to personal information and knowledge that is necessary for the performance of their duties.

5. COMMUNICATION

In principle, the CPE cannot communicate personal information it holds on a person without that person's consent.

However, the CPE may disclose personal information to a third party without the consent of the person concerned when the disclosure is due to a regulatory, legal or security/emergency requirement or when authorized by the *Privacy Act* or any other law.

6. CONSERVATION

As part of its day-to-day operations, the daycare center must keep many documents containing personal information. Certain documents must be kept for a period prescribed by the *Act respecting educational childcare services*, the *Regulation respecting educational childcare services*, the *Regulation respecting the reduction of contributions*, as well as by the directives and instructions of the Ministère de la Famille.

The document entitled "*Retention Schedule*" is to be used as a reference tool indicating the length of time certain documents are to be retained as property of CPE. **Please note that this document is subject to change.** It is the responsibility of the CPE General Director to ensure its relevance and accuracy.

Quality of personal information

CPE Vanier ensures the quality of the personal information it holds. To this end, personal information is kept up to date, accurate and complete in order to serve the purposes for which it was collected or used.

Personal information does not need to be updated unless it is necessary for the purposes for which it was collected. However, if the information is to be used to make a decision, it must be up to date at the time the decision is made.

Physical and digital documents

Depending on the nature of the personal information, data may be stored in various locations and formats. For example, data may be stored in CPE's offices, in various computer systems of CPE or its service providers, or in storage facilities or archives of CPE or its service providers. Service providers may include, but are not limited to, auditors, independent accountants, payroll companies, pension and insurance companies, first aid companies, etc.

Safety measures

Security and protection of personal information are important to CPE Vanier. CPE implements security measures to ensure that personal information remains strictly confidential and is protected against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

These security measures may include organizational measures such as limiting access to the bare essentials, backing up and archiving data using an external system, etc.), keeping written documents under lock and key, and technological measures such as the use of passwords and encryption (e.g. frequent password changes and the use of firewalls).

Document scanning

If the CPE chooses to destroy the original documents after they have been scanned, the following conditions must be met:

1. The information contained in the digitized documents has not been modified and has been preserved in its entirety;
2. The scanning process and the medium used to store scanned documents must guarantee document stability and longevity.

The CPE chooses cloud technology for its documents that enables it to comply with these conditions. The CPE records the digitization in the digitization register shown in **APPENDIX 1**.

7. DESTRUCTION

Original documents containing personal or confidential information are securely destroyed.

CPE uses final document destruction techniques adapted to the level of confidentiality of the document to be destroyed, such as shredding. Please refer to **APPENDIX 2** for OUR DESTRUCTION PROTOCOL. When destroying documents containing personal information, the CPE fills in the Destruction Register provided in **APPENDIX 3**.

8. PRIVACY IMPACT ASSESSMENT

CPE Vanier must carry out a privacy impact assessment (PIA) for all projects involving the acquisition, development and redesign of information systems or the provision of electronic services involving personal information.

The assessment of the impact on privacy must be proportionate to the sensitivity of the information concerned, the purpose of its use, its quantity, its distribution and its medium.

The CPE can use the guide developed by the Commission d'accès à l'information "*Guide d'accompagnement - Réaliser une évaluation des facteurs relatifs à la vie privée*" to carry out the privacy impact assessment, if necessary.

9. REQUEST FOR ACCESS OR CORRECTION

Anyone may request access to or correction of his or her own personal information held by CPE.

The person concerned must submit a written request to this effect to the CPE's Privacy Officer (either the General Director or another person chosen by the General Director).

Subject to certain legal restrictions, individuals may request access to and rectification of their personal data held by CPE if it is inaccurate, incomplete or ambiguous.

The CPE's Privacy Officer must respond in writing to such requests within 30 days of receipt.

10. PRIVACY INCIDENTS

Confidentiality incidents

A confidentiality incident is an unauthorized access, use or disclosure of personal information, as well as its loss or any other form of breach of confidentiality.

If the CPE Privacy Officer has reason to believe that a privacy incident involving personal information in its possession has occurred, it will take reasonable steps to reduce the risk of harm and to prevent similar incidents from occurring in the future.

In the event of a privacy incident, the privacy officer must assess the damage. This assessment takes into account, among other things, the sensitivity of the personal information concerned, the possible malicious uses of the information and the apprehended consequences of using the information, as well as the likelihood of the information being used for harmful purposes.

Where the incident presents a risk of serious harm to the individuals whose information is involved, the CPE Privacy Officer will notify in writing :

- The **Commission d'accès à l'information** via the prescribed **notification form** ;
- the person(s) concerned. The notice must provide adequate information on the scope and consequences of the incident. The notice must contain :
 - A description of the personal information affected by the incident. If this information is not available, the organization should indicate why this description cannot be provided.
 - Brief description of the circumstances surrounding the incident ;
 - The date or period when the incident took place, or an approximation of this period if not known;
 - A brief description of the measures taken or planned to reduce the risk of damage resulting from the incident;
 - Measures proposed to the person concerned to reduce or mitigate the risk of harm;
 - Contact details of a person or department that the person concerned can contact for further information about the incident.

Register of confidentiality incidents

The CPE keeps a register of confidentiality incidents, as described in **APPENDIX 4**.

The register records all privacy incidents involving personal information:

- those that do not present a risk of serious harm and ;
- people at risk of serious harm.

The information contained in the register of confidentiality incidents is kept up to date and retained for a minimum period of five (5) years after the date or period during which the CPE became aware of the incident.

11. PRIVACY COMPLAINTS PROCEDURE

Any person concerned by the application of this policy may lodge a complaint concerning the application of this policy or, more generally, concerning the protection of his/her personal data by the CPE.

The procedure for handling privacy complaints is described in **Appendix 5**.

12. CONTACT DETAILS OF THE PRIVACY OFFICER

CPE Vanier's Privacy Officer, who holds the official position of **General Director**, can be reached by telephone at **514-744-2506 extension 222** or by e-mail at **xenosa@vaniercollege.qc.ca**.

The CPE Privacy Officer may be contacted for any questions relating to the application of this Privacy Policy.

13. POLICY EFFECTIVE DATE

The policy takes effect at **CPE Vanier** on **September 22, 2023**. The policy has been approved by the Privacy Officer, **Athina Xenos, General Director of CPE Vanier**.

If this policy is modified, the Privacy Officer will make it available as modified.

APPENDIX 2 - FINAL DOCUMENT DESTRUCTION PROTOCOL

Permanent document destruction techniques¹

Media used	Examples of destruction methods
Paper (original and all copies)	- Shredder, preferably cross-cut shredder If documents are highly confidential: shredder + incineration
Digital media for reuse or recycling e.g. flash memory cards (SD, XD, etc.), USB sticks, computer hard drives	- Formatting, rewriting, digital shredding (software that securely deletes and writes information to the location of the deleted file).
Non-reusable digital media (e.g. certain CDs, DVDs, cards, etc.) flash memory, USB sticks and hard disks that will no longer be used	- Physical destruction (shredding, crushing, surface grinding, disintegration, drilling, incineration, etc.) Most shredders are capable of destroying CDs and DVDs. - Hard disk demagnetizer.
Hard disk drives photocopier, fax machine, scanner, printer, etc.	- Overwriting of information on the hard disk, or hard disk removed and destroyed when machines are replaced.

¹ Commission d'accès à l'information, Procédure de destruction, online: <https://www.cai.gouv.qc.ca/entreprises/procedure-de-destruction/>

APPENDIX 4 - CONFIDENTIALITY INCIDENT REGISTER

Register of confidentiality incidents								
Date or period of incident	Persons concerned (compromised information)	Description of incident	Incident awareness	# Number of people affected by the incident	Description of the factors leading to the decision	Date notice sent to Commission d'accès à l'information	Date of transmission of notices to the persons concerned	Description of measures taken to reduce the risk of damage

APPENDIX 5 - COMPLAINT PROTOCOL CONCERNING THE PROTECTION OF PERSONAL INFORMATION

Receipt of complaint

Any person wishing to lodge a complaint concerning the application of this policy or, more generally, concerning the protection of his or her personal data by CPE Vanier, must do so in writing to the CPE's Privacy Officer.

The individual must provide his or her name, contact information, including a telephone number, as well as the subject and grounds of the complaint, in sufficient detail to enable the CPE to assess the complaint. If the complaint is not sufficiently precise, the Privacy Officer may request any additional information he or she deems necessary to assess the complaint.

Handling complaints

CPE Vanier is committed to treating all complaints confidentially.

Complaints are dealt with within a reasonable time. The Privacy Officer assesses the complaint and provides a written response to the complainant, stating the reasons for the complaint.

The aim of this assessment is to determine whether the CPE's handling of personal information complies with the policy and practices in force within the organization, as well as with applicable legislation or regulations.

Complaint file

The CPE must establish a separate file for each complaint addressed to it within the framework of the present complaint handling procedure. Each file contains the complaint, the analysis and documentation supporting its evaluation, as well as the written response addressed to the complainant.