

## EXECUTIVE SUMMARY

### **INTRODUCTION AND OBJECTIVES**

The protection of personal information is governed by the Act respecting the protection of personal information in the private sector, the Charter of Human Rights and Freedoms, and the Civil Code of Quebec.

Personal information refers to data concerning a physical person that can be used to identify them. For example: name, signature, address, medical record, phone numbers, email, image and voice, financial information, social security number.

### **COLLECTION AND USE OF PERSONAL INFORMATION**

The cooperative collects personal information only when it has a serious and legitimate interest in doing so and retains only what is necessary for its proper operation. If you refuse to consent to this policy or its annexes, the organization may be forced to prevent you from using its products and services.

Aside from service delivery, personal information may also be used for market research purposes, newsletters, targeted advertising, and staff recruitment. Personal information will never be sold to third parties unless the organization obtains consent for this purpose.

### **PERSONAL INFORMATION PROTECTION MEASURES**

Physical files containing confidential information are kept locked in a cabinet. Digital files containing personal information are protected by a password. They are stored digitally in a secure local network that prevents unauthorized access to the organization's files. A VPN connection with two-factor authentication is also required to access certain information. The organization is equipped with a firewall, antivirus software, EDR solution, and network traffic monitoring to prevent malicious attacks.

### **POLICY RESPONSIBLE PERSON**

Ms. Marie-Eve Rocheleau is the General Manager and responsible for the protection of personal information within the organization. She can be contacted at (450) 532-2667 (toll-free at 1-888-532-2667) or [prp@cooptel.coop](mailto:prp@cooptel.coop).

### **RETENTION AND DESTRUCTION OF PERSONAL INFORMATION**

When the purpose for collecting personal information has been fulfilled, the organization destroys it, with certain exceptions. You can request that all personal information concerning you be provided or destroyed. Documents or data containing personal information are shredded, reformatted, overwritten, demagnetized, or the information is erased.

### **RIGHT OF ACCESS AND TRANSFER OF PERSONAL INFORMATION**

When you or an authorized representative submits a written request or completes the appropriate form in our governance policy, the organization will confirm whether it holds

personal information concerning you. Within thirty (30) days of receiving the request, the organization may allow consultation or transfer of the file and any personal information recorded in it. Refusals are provided in writing within the same timeframe. If no response is given within this period, it is equivalent to a refusal. It is then possible to contest a refusal before the « Commission d'accès à l'information » (CAI).

### **RIGHT TO DATA PORTABILITY**

When you or an authorized representative submits a written request or completes the appropriate form in our governance policy, the organization will communicate the personal information file to another company or organization designated by the individual concerned. The organization may, within thirty (30) days of receiving the request, transmit the computerized personal information held about the individual in a structured and commonly used technological format such as CSV, XML, JSON, ODT, and ODS. The organization will verify the requester's identity and ensure that they have the right to make the request through rigorous and documented validation. Identity documents will be requested from the concerned individual. Refusals are provided in writing within the same timeframe. If no response is given within this period, it is equivalent to a refusal. It is then possible to contest a refusal before the CAI.

### **REQUEST FOR CORRECTION OF PERSONAL INFORMATION**

When you or an authorized representative submits a written request or completes the appropriate form in our governance policy, the organization may rectify or delete personal information concerning you within thirty (30) days of receiving the request. Refusals are provided in writing within the same timeframe. If no response is given within this period, it is equivalent to a refusal. It is then possible to contest a refusal before the CAI. If the request is accepted, the organization provides proof confirming its execution. The organization cannot be held liable for any failure if a request for correction was not made by you when it should have been.

### **DISCLOSURE OF PERSONAL INFORMATION TO A THIRD PARTY**

When collecting personal information, the organization will ask you to complete a form if necessary. Third parties not listed must obtain your express consent to access your personal information, except for certain exceptions. The organization ensures that the policy is respected by third parties.

### **FEES FOR TRANSCRIPTION, REPRODUCTION, OR TRANSMISSION OF PERSONAL INFORMATION**

The organization charges reasonable fees for the transcription, reproduction, or transmission of personal information.

### **PROCEDURE IN CASE OF A CONFIDENTIALITY INCIDENT**

In the event of an incident involving personal information, the organization ensures that the procedure provided in the Act respecting the protection of personal information in the private sector and its regulations is followed. The concerned individuals, the CAI, and certain third parties, where applicable, will be notified as soon as possible. If you detect an incident, you must contact the person responsible for personal information protection

at the contact details above. Complaints/reports are handled within a maximum of thirty (30) days after filing.

Despite all the measures in place, the organization cannot guarantee foolproof security for every conceivable scenario.

#### **NON-APPLICABILITY OF THE POLICY**

This policy no longer applies if you leave our website, no longer have a business relationship with us, or if a law or court forces the organization to disclose personal information.