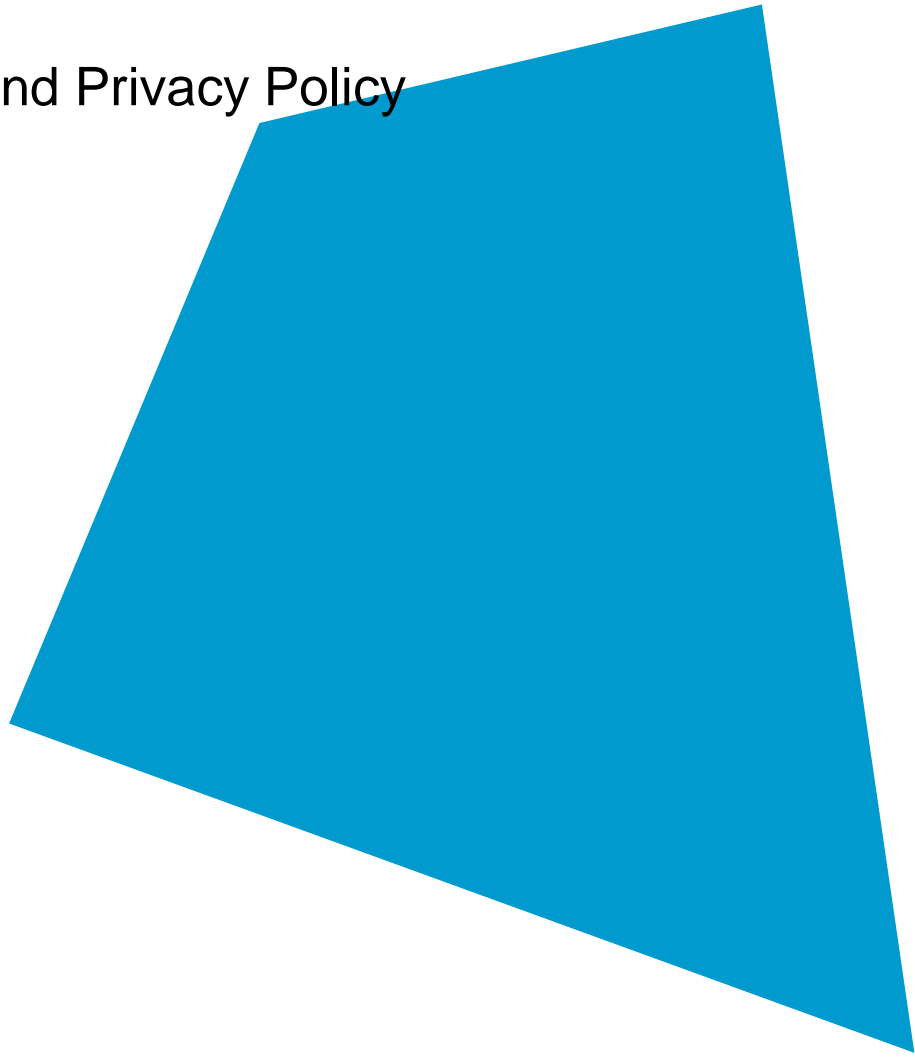


POL 20-03  
Data Protection and Privacy Policy  
Directorate-General



In force: 2023-12-08	Approval: Board of Directors

## Table of Contents

<b>1</b>	<b>Introduction.....</b>	<b>4</b>
<b>2</b>	<b>Applicable laws .....</b>	<b>4</b>
<b>3</b>	<b>Personal Information .....</b>	<b>4</b>
<b>4</b>	<b>Corporate Commitment.....</b>	<b>5</b>
<b>5</b>	<b>Purposes for which Personal Information is Collected.....</b>	<b>5</b>
<b>6</b>	<b>Consent .....</b>	<b>5</b>
6.1	Scope and Objectives.....	5
6.2	Personal Information concerning a Minor .....	6
<b>7</b>	<b>Collection, Use, and Communication of Personal Information and International Data Transfers.....</b>	<b>6</b>
7.1	Collection.....	6
7.2	Use .....	6
7.3	Communication .....	7
7.4	International Data Transfers .....	7
<b>8</b>	<b>Non-personal Information.....</b>	<b>7</b>
<b>9</b>	<b>Cookies .....</b>	<b>8</b>
9.1	Scope and Objectives.....	8
9.2	Cookies used by the Société on its Website.....	8
9.3	Cookies used by the Société's Service Providers .....	8
9.4	Cookie Management.....	8
<b>10</b>	<b>Retention of Personal information .....</b>	<b>8</b>
<b>11</b>	<b>Liability .....</b>	<b>9</b>
<b>12</b>	<b>Security Measures .....</b>	<b>9</b>
12.1	Scope and Objectives.....	9
12.2	Privacy Impact Assessment .....	9
12.3	Secure IT Environments .....	10
12.4	Access Management .....	10
12.5	Training and Awareness.....	10
12.6	Confidentiality Agreement .....	10
12.7	Destruction .....	10
12.8	Managing Incidents Involving Personal Information .....	11



<b>13</b>	<b>Rights of the Individuals Concerned</b> .....	<b>11</b>
13.1	Request for Access, Withdrawal or Correction of Personal Information .....	11
13.2	Personal Data Portability .....	11
13.3	Limiting and Opposing the Processing of Personal Information .....	11
13.4	Decision Based Exclusively on an Automated Process .....	11
<b>14</b>	<b>Requests, Complaints and Questions</b> .....	<b>12</b>
14.1	Scope and Objectives.....	12
14.2	Contact Details.....	12
<b>15</b>	<b>Approval and Revision of the Policy</b> .....	<b>13</b>
<b>16</b>	<b>Effective Date</b> .....	<b>13</b>



## 1 Introduction

The Société du Palais des congrès de Montréal (the “Société”) is concerned about the privacy and protection of personal information.

In the course of its business activities and the pursuit of its mission, the Société is likely to collect personal information.

The purpose of this Data Privacy and Protection Policy (the “Policy”) is to provide a framework for, among other things:

- The means by which the personal information is collected, used and disclosed;
- The rights of individuals with regard to their personal information;
- The person responsible for the processing of personal information;
- The guidelines for transmitting personal information;
- The use of Cookies on the Société’s website.

## 2 Applicable laws

The provisions of this Policy are essentially based on the Société’s obligations under the *Act respecting access to documents held by public bodies and the protection of personal information* (CQLR, c. A-2.1) (the “Act”) as well as on the *Regulation respecting the confidentiality policies of public bodies that collect personal information through technological means* (CQLR, c. A-2.1, r.7).

## 3 Personal Information

Any information concerning an individual that directly or indirectly allows the person to be identified is personal information. Personal information may include, but is not limited to, given name and surname, date of birth, residential address, telephone numbers, social insurance number, email address, gender identity, group membership, lifestyle or health information and any other information contained in a profile created to open an account on a web portal.

However, personal information does not include information concerning the exercise of a function within an enterprise, such as the person’s name, title and function, as well as the address, email address and telephone number of the person’s place of work or any other form of exclusion provided for in the Act.



## 4 Corporate Commitment

The Société has established and implemented this Policy, tools and internal procedures designed to adequately protect the personal information of anyone in its possession, regardless of its medium or format.

The Société is committed to raising its employees' awareness on the importance of protecting personal information by requiring training on this subject and by issuing directives on a timely basis emphasizing their role and obligations in this regard.

## 5 Purposes for which Personal Information is Collected

As part of its business activities and mission, the Société collects personal and confidential information to enable it to provide services in an adequate and personalized manner or to continue its day-to-day operations. In all cases, the communication of personal and confidential information will be subject to obligations to maintain confidentiality and to comply with applicable privacy regulations.

## 6 Consent

### 6.1 Scope and Objectives

Subject to the prior consent of a person concerned, which shall be obtained in a free, clear and informed manner and in a form that may vary according to the context or the service requested, the Société may **collect, use, communicate**, in particular to third parties, **and retain** its personal information. Consent will be sought for specific purposes, including but not limited to:

- By a representative for contractual or commercial purposes;
- By a representative of the Société's Human Resources Department to open an employee file following a hire;
- By a representative of the Société or by a service provider authorized by the Société to purchase a product or service offered by the Société.

At any time, an individual may withdraw consent, subject to certain exceptions set out in the regulations.

Notwithstanding the foregoing, in certain exceptional circumstances, the Société reserves the right to collect, use, communicate and retain personal information without first informing the person concerned or obtaining their consent. Such circumstances arise, among others, when, for legal, medical or security reasons, it is impossible or unlikely to obtain clear, free and informed consent, or when personal information is required to investigate a possible breach of contract, to prevent or detect fraud or to enforce the Act.



## 6.2 Personal Information concerning a Minor

Personal information concerning an individual under 14 years of age will not be collected from them without the consent of the individual's parent or guardian.

## **7 Collection, Use, and Communication of Personal Information and International Data Transfers**

### 7.1 Collection

The Société limits the collection of personal information only for the purposes set out in this Policy. Personal information is accessible to every person qualified to receive it within the Société when the information is needed to perform their duties. Therefore, all management personnel in the Société, including its managers, are likely to have access to personal information.

#### 7.1.1 Means by which Personal Information is Collected

The Société may use any means necessary to collect personal information, including paper and electronic forms, the website or any other technological platform, or telephone inquiries.

### 7.2 Use

The Société may use the personal information collected for the following specific purposes:

- To provide a service and any other complementary services;
- To improve the service offering;
- To monitor the quality of customer service and prevent errors and fraud;
- To confirm the identity of an individual and to meet any information request from the person;
- To operate and improve its website based on user usage habits;
- To meet the requirements of current regulations.



### 7.3 Communication

The Société may disclose an individual's personal information to its employees, professional advisors, service providers or subcontractors to the extent necessary to provide the requested services, to carry out its activities and for the purposes and under the conditions set forth in this Policy.

When disclosing personal information to a third party, the Société complies with the restrictions and requirements set out in the Act and, in certain circumstances, is subject to a written agreement and a security assessment that demonstrates that the personal information is protected in an adequate manner similar to that in place within the Société.

In addition, the Société undertakes:

- Not to disclose the personal information of an individual to third parties other than in accordance with the conditions set out in this Policy;
- Not to sell the personal information of an individual to third parties.

### 7.4 International Data Transfers


Personal information collected by the Société may be stored, processed and transferred in all countries in which the Société or its service providers and subcontractors offer their services, in order to allow it to use the information in accordance with this Policy.

Personal information that an individual submits for publication on the Société's website or on its social networks may therefore be available worldwide, via the Internet. By publishing personal information in this manner, an individual expressly agrees to the transfer of personal information described in this section. The Société cannot prevent the use, good or bad, of this information by third parties.

## 8 Non-personal Information

The Société automatically collects certain non-personal information using third-party analysis programs such as Google Analytics to help the Société understand how its visitors use its web services, but none of this information identifies any individual. The following information may be collected, stored and used:

- Information about an individual's computer, including its IP address, geographic location, type and version of its web browser, and operating system;
- Information about visits to and use of the Société's website, including the source of the information, the duration of the visit, the pages viewed and the navigation paths of the website;

- 
- Information generated during the use of the Société's website, including when, how often and under what circumstances an individual uses it.

## 9 Cookies

### 9.1 Scope and Objectives

The Société's web services use cookies. Cookies are small data files stored on a person's computer or mobile device when they visit a website or application. Cookies are used to enhance user experience by recording certain data. Anyone using the Société's web services consents to this use.

### 9.2 Cookies used by the Société on its Website

- **Authentication:** The Société uses Cookies to identify an individual when they visit and navigate its website and web platforms. The Cookies collected are used to manage connections and sessions.
- **Personalization:** The Société uses Cookies to store information on user preferences and personalize the service to their needs. Cookies are used to document which language is preferred by users of the Société's website.

### 9.3 Cookies used by the Société's Service Providers

In some cases, one of the services offered by the Société may be provided by one of its service providers, which may use Cookies that will be stored on a user's computer or mobile device.


### 9.4 Cookie Management

Individuals may set their browser or device to refuse or delete Cookies after registration. A "Help" section on the user's browser or device provides detailed instructions. Please note that deleting or declining these Cookies could negatively impact user experience.

## 10 Retention of Personal information

When personal information collected in accordance with this Policy is no longer required, it is destroyed in accordance with the Document Management Policy (POL 44-10). In certain cases, the Société may anonymize the personal information it stores.





Personal and confidential information is retained, either directly or through the Société's service providers or subcontractors, only as long as necessary for the purposes of the services requested and to meet applicable legal and regulatory requirements. The Société requires its service providers and subcontractors to adhere to confidentiality agreements and to apply policies equivalent to this one. In all cases, access to personal and confidential information is restricted to persons for whom access is required to perform their duties.

## **11 Liability**

The Société is responsible for personal information in its possession or custody, including information entrusted to third parties for the purpose of providing services requested by such third parties. The Société requires third parties to retain personal information to the highest standards of confidentiality and security.

The Société adheres to the principles set out by the Act. In this regard, the Société has implemented this Policy and internal procedures aimed at adequately protecting personal information, which ensure privacy protection. The person responsible for access and protection of personal information oversees the application of this Policy and Société personnel are informed of privacy practices.

## **12 Security Measures**

### **12.1 Scope and Objectives**

The Société has implemented a number of security measures with respect to the personal information and confidential data it holds in order to protect such information against loss or theft and to prevent unauthorized access, transmission, use or modification of such personal information, in particular by implementing the measures described in this section.

### **12.2 Privacy Impact Assessment**

The Société carries out a privacy impact assessment for any project involving the acquisition, development or redesign of an information system or the electronic delivery of services involving the collection, use, disclosure, retention or destruction of personal information, or any project requiring personal information to be hosted on computer servers located outside the province of Quebec, Canada. This assessment documents the serious and legitimate interest in the use of personal information and mitigates any risk of serious harm associated with the use of these information systems or computer servers.



### 12.3 Secure IT Environments

The Société's infrastructure and equipment are housed in a secure environment in a data centre located in the province of Quebec, Canada. In cases where it is impossible to host a solution or service in Quebec, the Société ensures that security measures equivalent to or greater than those required by this Policy are put in place. Security audits are conducted as required by specialized information security firms.

Access to the Société's web services is via a transmission channel secured by an SSL certificate (HTTPS).

### 12.4 Access Management

Only Société employees whose duties require it have access to personal or confidential information. Access to data is logged and monitored.

### 12.5 Training and Awareness

Société employees are trained and made aware of the importance of protecting personal information.

### 12.6 Confidentiality Agreement

All Société employees are required to comply at all times with the obligations set out in the Code of Ethics for Employees of the *Société du Palais des congrès de Montréal* (French only), which includes requirements relating to the protection of an individual's personal information.

### 12.7 Destruction

The Société ensures the physical and technological security of the personal information it holds in order to prevent accidental or inappropriate destruction, loss or disclosure.

The Société retains personal information for as long as necessary for the purposes for which it was collected. It will destroy or anonymize this information in accordance with the Act and its retention schedule. When the Société destroys or anonymizes personal information, it takes the necessary measures to ensure its confidentiality and that no unauthorized person has access to it during the destruction or anonymization process.



## 12.8 Managing Incidents Involving Personal Information

If the Société has reason to believe that a confidentiality incident involving personal information has occurred and that there is a risk of serious harm caused by the incident, the Société will promptly inform the Commission d'accès à l'information and any person whose personal information is affected by the incident. It may also notify any person or body likely to reduce this risk by communicating only the personal information required for this purpose, without the consent of the person concerned. In all cases, a register will record the incident for reference purposes.

## 13 Rights of the Individuals Concerned

### 13.1 Request for Access, Withdrawal or Correction of Personal Information

Any individual may view, have corrected, verify the accuracy and completeness of the personal information that the Société holds about them or file a request for the destruction of their personal information.

The Société will then process any request within a maximum of 30 days from the date of receipt of an applicant's written request and in a structured and commonly used technological format. A fee may be charged to process a request.

Subject to certain exceptions set out in the Act, the Société may refuse to provide the personal information requested. Exceptions to this right of access to personal information include the fact that information cannot be disclosed for legal or security reasons.

### 13.2 Personal Data Portability

An individual has the right to request the portability of their personal information held by the Société to another site.

### 13.3 Limiting and Opposing the Processing of Personal Information

An individual has the right to request that the Société limit or oppose the processing of their personal information, and the Société may not refuse such a request except for serious and legitimate reasons.

### 13.4 Decision Based Exclusively on an Automated Process

An individual has the right not to be subject to a decision based exclusively on an automated process if the decision produces legal effects concerning them.



## 14 Requests, Complaints and Questions

### 14.1 Scope and Objectives

The Société undertakes to answer any individual's questions and concerns regarding the protection of their personal information. If the response is not satisfactory, the individual is invited to contact the person responsible for access to and protection of personal information at the Société.

### 14.2 Contact Details

Any request or complaint concerning the protection of personal information must be forwarded in accordance with the procedure described on the Société's website and addressed to the person responsible for access and protection of personal information at the address below:

Person Responsible for Access and Protection of Personal Information

**Sara Bergevin**

Corporate Secretary and Manager of Legal Affairs

159 Saint-Antoine Street West, 9th  
floor Montreal, QC H2Z 1H2

Email: [renseignementspersonnels@congresmtl.com](mailto:renseignementspersonnels@congresmtl.com)

If the person responsible for access and protection of personal information decides not to respond to a request, and an individual wishes to contest this decision, or believes that the person responsible for access and protection of personal information has violated one of their rights, they may contact the [Commission d'accès à l'information du Québec](#).



## **15 Approval and Revision of the Policy**

This Policy comes into force following its adoption by the internal Access to Information Committee and the Société's Board of Directors.

Amendments may be proposed by various Société stakeholders and must be submitted in writing to the person responsible for access and protection of personal information.

The Société reserves the right to amend this Policy at any time. Any amendment will be published on the Société's various web platforms. The use of the Société's services following the posting of the amendments to the Policy constitutes acceptance of those amendments.

This Policy should be reviewed at least every two (2) years to ensure that it remains relevant to the Société's mission, to the activities of its users, and to any substantial changes in legislation or regulatory requirements.

## **16 Effective Date**

This Policy takes effect upon its adoption by the Société's Board of Directors. It cancels and replaces all previous guidelines on this matter.