

Law 25

# Protection of personal information



CLD DES JARDINS-DE-NAPIERVILLE

Centre local de développement

Organisation

**Local Development  
Center of Jardins-de -  
Napierville**

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## 1. Introduction

The Local Development Center of Jardins-de-Napierville care greatly about the protection of personal information of our customers, employees, and all those who interact with our company.

The purpose of this Privacy Policy is to explain how we collect, use, disclose, store, and protect personal information through our official website or by technological means in accordance with the provisions of Law 25.

Please read the Policy carefully before using our website. By submitting your personal information using this site, you consent to the collection, use and disclosure of your personal information in accordance with the Policy.

For the purposes of the Policy, personal information means any information that can identify an individual, including address, telephone number, gender, date of birth, e-mail address, etc. Where reference is made to the Act, this means the Act respecting access to documents held by public bodies and the protection of personal information. (RLRQ c. A-2.1).

As an organization, we are committed to respecting the privacy of our customers and maintaining the confidentiality of their personal information.





## 2. Scope of application

This general policy applies to all divisions and entities, under CLD's jurisdiction, based in the province of Quebec, handling personal information hosted in Quebec or stored in Quebec.

"Personal information" (PI) is any information that relates to a natural person and makes it possible, directly or indirectly, to identify that person. This definition applies to information collected and stored by the CLD or by a partner, regardless of the medium on which it is stored or the form in which it is accessed.

## 3. Collect of personal information

The CLD may collect personal information in various forms, but will only do so in accordance with this Policy and the requirements of the Act respecting the protection of personal information in the public sector.

We only collect the personal information necessary for the conduct of our legitimate activities.

In fact, the personal information we collect is gathered through online forms, emails exchanged with the organization through the interactivity established between you and our website.

The nature of the personal information we collect, as well as its sensitivity, may vary depending on the context in which the interactions between you and the CLD occur. That is why we provide you with the following information regarding the nature of the personal information we collect:

### **Identification Informations :**

- Name and first name, email and postal addresses, phone number.
- Banking information, check specimen.
- Credit card number, driver's licence, credit score.
- Social insurance number.
- Profession and region.

**Informations about interactions with the CLD :**

- Written communication via email or other online forms.

**Informations about the use of our website :**

- Information collected through cookies, i.e., login cookies; IP address, browsing history on the website.
- Any other information necessary for the provision of services.

## 4. Use of personal information

All staff (permanent, temporary and trainee) and service providers are responsible for information security and must therefore understand and comply with this policy and related guidelines. Failure to comply with security guidelines may result in disciplinary action for staff and penalties, remedies or termination of contracts for service providers. Employees and service providers must understand:

- What information they use, how it should be handled, stored and transferred to ensure its protection.
- What procedures, standards and protocols are in place for exchanging information with others (both inside and outside CLD).
- That they are responsible for reporting and how to report a computer incident, an attempted attack (e.g. phishing) or a suspected breach of information security within the organization according to the confidentiality incident management procedure.

The informations we collect may be used for the following purposes:

- Providing our services and answering our customer requests.
- Communicating with our customers regarding services and updates.
- Improving our services.
- Conducting statistical analysis.
- Meeting our legal obligations.



By providing us with your personal information, you consent to its processing in accordance with our current policy, and you authorize the CLD and, if applicable, its financial partners to process your data in accordance with the Personal Information Protection Act and for the purposes outlined in this policy. In other words, if the processing of your file or submission requires the collaboration of other individuals, such as our partners, it is possible that we may need to share your personal data with them. However, we will inform you of this situation and ensure that they understand and respect your rights.

It is also important to know that your personal data is not sold to third parties. Nevertheless, if the law requires it, we may be obligated to share your data with the courts or the government.

The information collected is used for the following purposes: processing your submission request, providing information on funding opportunities or promotional offers, updates on our activities, and personalized advice. Furthermore, except as required by the Personal Information Protection Act in the public sector, the CLD will not disclose your personal information to third parties without your consent, except for its financial partners.

## **5. Disclosure of personal information**

The personal information we collect may be shared with the following parties.

These parties include but are not limited to

- Members of management.
- Project managers.
- Employees from the administration and accounting department.
- Customer service employees.
- Third parties providing auxiliary services.
- Payment gateway providers.
- Third-party software developers, integrators, and managers (Réactif, ITGS).

## 6. Retention of personal information

The CLD retains, uses and destroys the information collected in accordance with the terms of the administrative policy concerning rules of governance for access to information and protection of personal information.

## 7. Security of personal information

ITGS inc. is responsible for the deployment and management of CLD's IT security controls and acts as the main point of contact for staff IT security issues.

We use the following technologies and security procedures to protect personal information:

- Software firewall.
- Antivirus software and regular scans on all network computers.
- Data encryption on our website.
- Software access control to computer data.
- Physical access control to offices.
- Employee training on phishing awareness.

### **Hyperlink to a third-party website:**

It is important to note that the CLD has provided users of its website with hyperlinks to other sites.

Since these sites are not governed by the current privacy policy but rather by the privacy policies of the respective external sites, if applicable, the CLD cannot be held responsible for their content.



## 8. Access and correction of personal information

Our customers have the right to obtain their personal information in order to correct, modify or delete it if necessary. To exercise these rights, customers can contact us using the contact information for the responsible party provided at the end of this policy.

In accordance with the law, any person who wishes to have access to his or her PR, who wishes to modify it or who is dissatisfied with the handling of his or her PR may contact the person responsible for PR at CLD by the following means:

- E-mail: [s.dumais@cldjdn.ca](mailto:s.dumais@cldjdn.ca)
- Mailing address: 361, St-Jacques, C.P. 1068  
Napierville (QC) J0J 1L0
- Telephone: 450-245-7289

## 9. Policy amendments

We reserve the right to modify this policy at any given time. Any changes will be posted on our website and will become effective upon publication. Users are advised to regularly check our policy for updates and to stay informed.



## 10. Contact information

For any questions, concerns, or requests related to the protection of personal information or this policy, please contact us at our headquarters:

### CLD Les Jardins-de-Napierville

361, rue St-Jacques, C.P. 1068  
Napierville Québec J0J 1L0

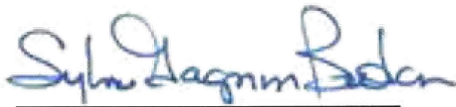
### Responsible person

Ms. Sonia Dumais  
General Manager  
450-245-7289  
s.dumais@cldjdn.ca



## 11. Final Disposition

This policy comes into effect upon adoption by the Board.



Sylvie Gagnon-Breton

President

Policy adoption : December 14, 2023

Résolution : 2023-12-143



Sonia Dumais

General Manager