



## **Privacy and confidentiality policy** **Comité logement du Plateau Mont-Royal**

The Comité logement du Plateau Mont-Royal (CLPMR) is a non-profit legal entity that works with personal information as part of its associative and democratic activities and its legal information service.

The purpose of the following policy is to ensure the protection of the personal information of individuals who use CLPMR's services or participate in its activities. This policy governs the way in which the organization collects, uses, communicates, retains and destroys the personal information it receives. This policy also deals with the manner in which the CLPMR collects personal information by technological means.

### **1. Scope and definitions**

This policy applies to CLPMR permanent employees, as well as temporary, contractual, summer employees and interns of the organization.

The policy applies to all personal information collected in the course of providing CLPMR services. In this policy, personal information is defined as information concerning a natural person that allows, directly or indirectly, that person to be identified, such as name, telephone number, address, name of the owner of the dwelling or e-mail address.

### **2. Collection, use and disclosure of personal information**

In the course of its activities, the CLPMR needs to collect personal information, which is essential for its associative and democratic activities and for its follow-up of tenant service files. This information is compiled in the form of statistics in our activity report, for purposes of accountability to our various funding bodies.

As part of our legal information service, the information gathered helps us to draft formal notices, identify buildings where collective action could be planned, and target the problems most prevalent in the neighborhood. It can be shared with partners with the consent of the person concerned.

CLPMR collects only the information required to provide services or participate in the organization's activities.

In its collection, use and disclosure of personal information, CLPMR applies the following principles:

#### Consent

In general, CLPMR collects personal information directly from the person concerned, sometimes with the help of a relative or interpreter if necessary. This data collection takes place with the person requiring the organization's services. This information is obtained with the written or implicit consent of the person concerned, unless an exception is provided for by law.

The CLPMR must also obtain the consent of the person concerned before collecting his or her personal information from third parties, before communicating it to third parties or for any secondary use thereof.

A written authorization is required for us to contact any public or parapublic organization on your behalf, such as the Division des permis et inspections of the Plateau Mont-Royal borough, the Ville de Montréal, an Office municipal d'habitation, a CIUSSS, etc.

### Collection

All information requested from individuals requiring our services is requested because there is a valid reason for doing so. CLPMR does not collect information that is not required for service delivery, unless it is used for statistic purposes, in which case individuals are informed.

Information collected from third parties, in the case of government bodies, is always done with the signature of an authorization signifying consent. Verbal consent is used when the CLPMR needs to contact another organization or person. The CLPMR's communication with a third party for data collection purposes is always done as a necessity for the provision of service.

### Retention and use

CLPMR ensures that the information it holds is up-to-date and accurate at the time it is used to make a decision about the individual. The CLPMR uses personal information only for the purposes stipulated when the authorization was signed. Personal information is only used to provide the services requested by the individual. A new authorization must be signed when a new service request is made, or if it is for a new service period.

As soon as the organization wishes to use this information for another purpose, a new consent must be obtained from the person concerned.

When CLPMR wishes to use personal information for statistical purposes, analyses, open letters or any other public communication, the information will first be anonymized.

Access to personal information is limited to CLPMR permanent employees, interns and contract employees under the supervision of the work team, all of whom are subject to the code of ethics and this policy.

### Disclosure

Generally, and unless an exception is indicated in this policy or otherwise provided for by law, CLPMR will obtain the consent of the person concerned before disclosing his or her personal information to a third party, by written authorization or verbal consent.

### Additional information on the technologies used

To become a CLPMR member , a web form is integrated into our website. This information is compiled in the same way as the other information mentioned in this policy.

### **3. Retention and destruction of personal information**

CLPMR documents are kept in a locked office at all times, except when one or more employees are present. Computers and online work tools are locked by a password personal to each employee.

All files of permanent or contract employees and interns are kept indefinitely for future reference, but will be destroyed at the verbal or written request of the employee in question.

All files will be professionally destroyed.

### **4. Responsibilities of the Comité logement du Plateau Mont-Royal**

In general, the organization is responsible for protecting the personal information it holds.

The person responsible for the protection of personal information at CLPMR is Victor Tardif.

This person is responsible for ensuring compliance with applicable legislation and policy and for modifying practices as required. He or she keeps the incident register up to date. In the event of the absence or inability to act of the person in charge, the work team and the Board will designate a person to assume the duties of the person in charge of the protection of personal information.

Although the responsibility rests with Victor Tardif, all permanent staff, interns and contract employees who have access to personal information or are otherwise involved in its management must ensure its protection and comply with this policy.

### **5. Data protection**

CLPMR is committed to implement reasonable security measures to ensure the protection of personal information contained in its files.

### **6. Rights of access, adjustment and withdrawal of consent**

To withdraw consent, request access or request a rectification, the person concerned must contact the person responsible for the protection of personal information by e-mail at the contact details found in the following section.

### **7. Complaints-handling process**

#### **Reception**

To file a complaint concerning the implementation of this policy, individuals must contact the person responsible for the protection of personal information.

For all requests, questions, complaints or comments relating to this policy, please contact the person responsible for the protection of personal information at CLPMR, by e-mail, at the following coordinates:

Victor Tardif, [victor@clpmr.com](mailto:victor@clpmr.com)

The following information is required in the complaint:

- Name
- Contact information (phone number and/or e-mail)
- Subject
- Reason for complaint

### Processing

Complaints are handled confidentially within 30 days.

You may also file a complaint with the Commission d'accès à l'information du Québec or any other privacy oversight body responsible for enforcing the law relating to the subject of the complaint.

## **8. Approval**

This policy is approved by the CLPMR Board and the CLPMR Privacy Officer, whose business coordinates are as follows:

Comité logement du Plateau Mont-Royal

4450 rue St-Hubert, local 328

Montréal, Qc, H2J 2W9

514-527-3495

[clplateau@clpmr.com](mailto:clplateau@clpmr.com)

For all requests, questions or comments regarding this policy, please contact Victor Tardif, designated as the person responsible for the protection of personal information at CLPMR.

## **9. Publication and amendments**

As prescribed by the [Act to modernize legislative provisions as regards the protection of personal information](#), also known as Bill 25, this policy is published on the CLPMR website. This policy is also circulated by any means likely to reach the persons concerned.

## **10. Privacy and/or security incident**

A confidentiality incident occurs when personal information is accessed, used or disclosed in a manner not authorized by law, or when personal information is lost or compromised in any way.

A security incident occurs when offices or computer systems are penetrated by unauthorized persons.

CLPMR undertakes to follow the following obligations in the event of an incident:

- Keep a register of confidentiality incidents;
- Take reasonable steps to reduce the risk of harm being caused;
- Notify the person concerned and the Commission d'accès à l'information if the incident presents a risk of serious harm.

## **11. Privacy Impact Assessment**

CLPMR is committed to conducting a Privacy Impact Assessment according to the guide provided by the Commission d'accès à l'information du Québec in the following situations:

- A project or initiative involving personal information;
- A project likely to have an impact on the privacy of individuals.

## Confidentiality and/or security incident report

<b>Confidentiality and/or security incident report</b>	#
<b>Date of the incident</b>	
<b>Date the organization became aware of incident</b>	
<b>Circumstances of the incident :</b> - Personal information affected by the incident - Person(s) involved in the incident	
<b>Is there a risk of serious harm?</b>  For example: loss of employment, bank fraud, identity theft, etc.  <b>If the incident represents serious harm, please report it to the Commission d'accès à l'information du Québec.</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No  <a href="https://www.cai.gouv.qc.ca/a-propos/nous-joindre/">https://www.cai.gouv.qc.ca/a-propos/nous-joindre/</a> 514 873-4196
<b>Action required</b>	
<b>Date on which the measure was implemented</b>	
<b>Comments</b>	

Signature of person in charge :

\_\_\_\_\_

Date : \_\_\_\_\_