

**Privacy policy**  
(hereinafter "**the Policy**")

**Overview:**

Réseau des SADC et CAE ("Réseau") collects personal information during your interactions with an authorized Réseau representative and through its website, <https://www.sadc-cae.ca> (the "**Website**").

This personal information is collected in various ways:

- Automatically when you connect to the Website;
- Automatically via cookies and tracking pixels on the Website;
- By email;
- By telephone;
- Electronically during hiring interviews;
- By sending personal information through the mail;
- In person; or
- By filling out hiring forms in paper format or on the Website.

**Purposes for personal information**

Personal information is collected in order to:

- Communicate with job candidates or potential clients and ensuring that those communications are personalized;
- Advertise to clients or potential clients or job candidates;
- Evaluate job applications;
- Fulfill the requests of clients, candidates or visitors to the Website;
- Evaluate clients' needs and interests;
- Ensure that a visitor can **connect to** the Website;
- Guarantee that the Website **functions properly**;
- **Evaluate the effectiveness** of Réseau efforts to **attract visitors, clients or candidates**;
- **Improve the Website's performance** and effective visitor retention;
- **Identify the legislative jurisdiction** under which the personal information of visitors to the Website falls;
- **Advertise** to potential job candidates, visitors or clients;
- **Comply** with an Act, court order or legal proceeding;
- Ensure Réseau's **legal protection**;
- Evaluate and improve **security** and **protection measures**;
- **Prevent or detect fraud**; and

- Respond to **complaints and requests for access, correction or withdrawal of consent.**

### **Disclosure of personal information**

Réseau discloses personal information to:

- Its employees if they require access to that information in the performance of their duties;
- Any other person or entity, when such disclosure is required or permitted by applicable law, with or without the consent of the person concerned; and
- Outside service providers with whom Réseau has signed a contractual agreement under which the outside service provider may not use the personal information for purposes other than to provide the said service and is required to destroy the personal information provided no later than at the end of the contractual agreement.

### **Consent**

If you continue to use Réseau's Website, if you provide such information to an authorized Réseau representative or if you provide personal information to Réseau by completing a form provided by Réseau, you consent to the purposes and disclosure of the personal information listed above and below.

You must consent to the purposes, use and disclosure of your personal information before using Réseau's Website. Please review the document below to learn more about the circumstances under which the information will be collected.

This Policy states the governance measures and practices that **Réseau des SADC et CAE** ("**Réseau**") has put in place regarding personal information and the protection of personal information. **Réseau** collects personal information from its clients, visitors to its Website or individuals applying for employment at **Réseau** ("**you**," "**your**" or "**yours**"). **Réseau** collects your information through (i) a direct or indirect communication with an authorized **Réseau** representative or (ii) its Website, <sadc-cae.ca>, and for the purposes described in section 1 above.

In this Policy, the term "personal information" means any information collected by **Réseau** that can be used, alone or in combination with other information, to directly or indirectly identify any person concerned by the personal information.

The primary goal of this Policy is to inform you of:

- The methods **Réseau** uses to collect personal information;
- The types of personal information that **Réseau** collects and the purposes for which that personal information is collected;
- The ways in which **Réseau** may use personal information and the third parties to which **Réseau** may disclose personal information, if applicable;
- The security measures in place for **Réseau** to protect the privacy of personal information; and
- Your rights regarding the personal information that **Réseau** collects, including for accessing your personal information or requesting the correction of inaccurate personal information, if applicable.

By transmitting any personal information to **Réseau** through (i) a direct or indirect communication with an authorized **Réseau** representative or (ii) using the Website, you are expressly consenting that **Réseau** may collect, use, disclose and keep this personal information in compliance with the terms and conditions of this Policy.

This Policy and any amended version of it are subject to applicable laws in the province of Quebec in Canada.

**1. Under what circumstances, by what means and for what purposes does Réseau collect personal information?**

**Réseau** collects personal information under two circumstances: (i) when personal information is voluntarily provided to an authorized **Réseau** representative and (ii) when you use the Website.

**i) Personal information voluntarily provided to an authorized Réseau representative**

*Means of collection*

Personal information may be voluntarily provided to an authorized **Réseau** representative by various means, including:

- a. Voluntarily answering questions from **Réseau** representatives that may communicate directly with you by phone, in person, by mail or by email;
- b. Providing personal information to **Réseau** representatives by phone, in person, by mail or by email;
- c. Providing information to **Réseau** representatives electronically, by phone or in person during hiring interviews; or
- d. Voluntarily completing our form (the "**Form**") if you would like to contact the **Réseau**.

*What personal information does Réseau collect through its authorized representatives?*

In the circumstances described above, **Réseau** may collect the following personal information:

- First and last name, language of preference and certain contact information (phone number, email address, etc.);
- For job applications, information about your level of education or training (year of graduation, information about primary, secondary, college or university study, etc.);
- For job applications, your judicial record;
- For job applications, the position sought (whether the position sought is full time, part time or student work);
- For job applications, your employment history and work experience;
- Financial information when required to complete a transaction desired by the person concerned by the personal information; or
- For job applications, personal information provided by your resume that it is necessary for us to collect to evaluate you as a candidate.

In all cases, before collecting personal information about you, the authorized **Réseau** representative will inform you of the personal information being requested before collecting it.

*For what purposes is personal information collected by Réseau representatives?*

**Réseau** collects personal information through its representatives in order to:

- **Communicate** with job candidates or potential clients and ensuring that those communications are personalized;
- **Advertise** to clients, visitors or potential job candidates;
- **Evaluate job applications;**
- **Respond** to your requests;
- **Evaluate** your **needs and interests;**
- **Comply** with an Act, court order or legal proceeding;
- Ensure **Réseau's legal protection** in the event of legal action;
- Evaluate and improve **security** and protection measures;
- **Prevent or detect fraud or illegal acts;** and
- Respond to **complaints and requests for access, correction or withdrawal of consent.**

ii) Personal information collected when you use the Website.

Means of collection

When you visit our Website, personal information about you is collected by various means:

- Automatically **when you connect to the Website** (your computer and the Website server automatically exchange personal information when connecting);
- Automatically by installing **session cookies** on your computer and by **using pixels**;
- Automatically by our logging processes;
- Via your email communications (if you provide us with personal information by email); and
- Through information that you enter into our forms available on our Website.

What personal information does **Réseau** collect?

**Réseau** may collect the following personal information:

**a. Information collected automatically:**

When you visit our Website, some personal information is collected automatically:

- The domain name of your internet provider;
- Your IP address;
- Your browser (Explorer, Firefox, etc.);
- The operating system (Windows, Mac OS, etc.) that you are using;
- The date and time of your visit to the Website;
- The pages you looked at; and
- The address of the referring website, if you access our Website from another site.

**b. Information connected to a contact information:**

If you fill out the contact form available, you will provide us with the information entered into the form:

- Your first and last name, language of preference and certain contact information (phone number, email address, etc.);

**c. Other information collected:**

If you send us an email, submit a request or communicate with us directly by chat, you may provide us with other personal information, the content of which will vary depending on the nature of the conversation.

Please note that personal information put into writing in your conversations and communication history with **Réseau** will be collected.

Lastly, for any request for access, correction or withdrawal of consent under the terms of section 7 of this Policy, you will be required to prove your identity by showing us a valid form of photo ID with your name on it. Any other personal information on your ID may be hidden.

For what purposes does **Réseau** collect personal information?

**Réseau** collects your personal information in order to:

- Ensure that a visitor to the Website can **connect to the Website**;
- Guarantee that the Website **functions properly**;
- **Evaluate the effectiveness** of **Réseau** efforts to **attract visitors**, clients or candidates;
- **Improve the Website's performance** and effective visitor retention;
- **Identify the legislative jurisdiction** under which the personal information of Visitors falls;
- **Communicate** with job candidates or potential clients and ensuring that those communications are personalized;
- **Advertise** to clients, visitors or potential job candidates;
- Evaluate clients' needs and interests;
- **Evaluate the quality of job candidates**;
- **Comply** with an Act, court order or legal proceeding;
- Ensure **Réseau's legal protection** in the event of legal action caused by your action or inaction or in the event of legal action by you against **Réseau**;
- Evaluate and improve **security** and protection measures;
- **Prevent or detect fraud**; and
- Respond to **complaints and requests for access, correction or withdrawal of consent**.

Links to other sites

The Website may at times provide links to other websites belonging to other organizations. When visiting those sites, this privacy policy does not apply to you. Instead, the external site's policy, if it has one, applies.

**2. Who is Réseau likely to disclose your personal information to?**

Generally speaking, **Réseau** uses your personal information solely for internal purposes.

However, **Réseau** may communicate, send or provide access to your personal information to:

- a. **Réseau** employees, if they require access to that information in the performance of their duties;
- b. Any other person or entity, when required or permitted by applicable law;
- c. Any other person or entity, if you consent to having your information provided to that person or entity; or

- d. Outside service providers with whom **Réseau** has signed a contractual agreement under which the outside service provider may not use the personal information for purposes other than to provide the said service and is required to destroy the personal information provided at the end of the contractual agreement.

**Réseau** may provide your personal information to persons or entities located **outside the province of Quebec** if those persons or entities are in the categories listed above.

### **3. Limits on the disclosure and use of personal information**

The personal information we collect **is destroyed as soon as the purposes for which it was collected are complete, unless**, of course, laws or regulations require **Réseau** to keep it or impose a specific retention time.

**Réseau does not sell personal information** to third parties and **does not allow third parties to access personal information** unless such access is necessary to accomplish one of the aforementioned purposes and a law or regulation authorizes or requires access to or disclosure of personal information without the consent of the persons concerned.

All privacy settings that apply to your use of the Website provide, by default, the highest level of privacy without any action on your part.

### **4. How does Réseau protect the privacy of your personal information?**

**Réseau** employs sufficient physical, technological, contractual and administrative measures to protect your personal information and lower the risk of unauthorized access, use, disclosure or destruction of that information.

Without limiting the generality of the foregoing, the Website uses certain security mechanisms to protect your personal information:

- Personal information collected on the Website is **encrypted at rest**;
- All **transfers** of personal information between different parts of the Website are **encrypted**; and
- **Réseau's** computer service providers are **contractually obligated to respect security requirements** including a validation period for security processes and practices as well as continuous monitoring and updating of the Website's software components.

In addition to these measures, **Réseau** also takes other measures, including:

- An **internal access management policy** for its employees. Under this policy, access to personal information is limited to our employees who require such access to carry out their duties;
- An **internal information security policy** for **Réseau** employees to ensure the integrity, availability and confidentiality of personal information;
- A **privacy incidents log** that helps **Réseau** monitor any minor or major incidents that may compromise your personal information in order to ensure that such incidents are not repeated and to identify the necessary steps to take;

- A **personal information retention schedule** so that personal information is destroyed when it is no longer required for the purposes listed above and when the law no longer requires it to be retained;
- A **privacy incident response plan** so that **Réseau** can respond swiftly and effectively if your personal information is compromised;
- A **log of access** to your personal information; and
- **Yearly training for our personnel.**

Despite all of these measures, **Réseau** cannot fully guarantee the security of personal information in its possession. If you suspect that the personal information **Réseau** has about you has been compromised, please contact our Personal Information Protection Officer at the following address: [pharvey@sadc-cae](mailto:pharvey@sadc-cae).

## 5. What measures has Réseau put in place regarding privacy incidents?

**Réseau** maintains an up-to-date **privacy incident log**, in compliance with applicable legislation. If there is a breach involving your personal information and there is risk of significant harm to you, **Réseau** will take the necessary steps to **notify** you, in compliance with applicable legislation. **Réseau** will also take steps to **limit the potential harm** resulting from the breach and **minimize the risk of a repetition of the breach**.

## 6. What is the retention period for personal information?

Under our procedures for the secure retention and destruction of personal information, we do not retain your personal information beyond the period required for the purposes listed in section 1 of this Policy, or the period required by our statutory obligations, whichever is longer.

## 7. Personal information requests

### i) Request for access

You or a person empowered to do so by the *Act respecting the protection of personal information in the private sector* may submit a **request for access** to your personal information by following the procedure provided below to directly contact our Personal Information Protection Officer. The **Réseau's** Personal Information Protection Officer will grant you access unless:

- **Réseau** is prevented by law from granting such access;
- **Réseau** has a serious and legitimate reason to refuse such access; or
- Granting such access risks serious harm to a third party.

In principle, exercising your right of access is free of charge. However, reasonable fees may be charged to the requester in order to cover costs of transcribing, reproducing or sending personal information. If so, the requester will be advised of the amount of those fees before the request is processed.

You can also request a **copy** of your personal information by following the procedure provided below to submit a written request to the Personal Information Protection Officer.

In the event that **Réseau** agrees to any request for a copy of computerized personal information, **Réseau** will provide that copy to the requester (or to any person or organization legally authorized



to receive such personal information) in a structured, commonly used technological format, unless providing this copy in such a technological format creates significant practical difficulties or unless **Réseau** or one of its service providers has inferred or created the personal information.

ii) Request for correction

We request that you inform us of any change that may affect the authenticity or accuracy of your personal information.

You or a person empowered to do so by the *Act respecting the protection of personal information in the private sector* may also submit a request for correction of your personal information. With such a request, you can correct personal information in our possession if:

- The personal information is inaccurate;
- The personal information is outdated;
- The personal information is ambiguous;
- The personal information is incomplete; or
- The personal information was unjustifiably collected.

Alternatively, you may send a written request for correction asking that our Officer destroy personal information that is outdated or has been unjustifiably retained. Any destruction or correction request must be addressed in writing to our Personal Information Protection Officer according to the procedure provided below.

iii) Request to cease disseminating, de-index or re-index

**Réseau** may also, upon request from the person concerned by the information or from any person legally empowered to do so, cease disseminating any personal information or de-index or re-index, as the case may be, any hyperlink attached to the name of the person the personal information concerns, subject to the criteria provided by the applicable legislation in force at that time.

iv) Request to withdraw consent

Subject to your contractual agreements with **Réseau** and to applicable legislation, the *Act respecting the protection of personal information in the private sector* (if it applies to you) empowers you to withdraw your consent to certain uses or disclosures of your personal information. Please be aware that exercising this right may affect the services that **Réseau** provides you. If you make such a request, **Réseau** will determine what the consequences of withdrawing consent will be on your services.

## 8. Request procedures

All requests for access or correction must be sent in writing to Pascal Harvey, our Personal Information Protection Officer. Requesters may contact him directly by sending an email to [pharvey@sadc-cae.ca](mailto:pharvey@sadc-cae.ca)

The request must provide sufficient detail to enable our Officer to assess and find the personal information that the request covers. The requester must ensure that the Officer can reach them so that the Officer can ask them to assist in clarifying their request, to make it easier to identify

the personal information referenced in the request and, most importantly, so that the requester can be notified of whether the request was accepted or refused, as appropriate.

The Personal Information Protection Officer must process such requests within 30 days. If the request is not processed within 30 days, it is considered to have been refused.

## **9. Complaints procedure**

You may submit a complaint about our methods, practices and policies for the protection or governance of personal information, by directly contacting our Personal Information Protection Officer at the following email address: [pharvey@sadc-cae.ca](mailto:pharvey@sadc-cae.ca).

The Personal Information Protection Officer will respond to a complaint within 30 days of receiving it. If the complaint is upheld, you will be provided with a short summary of changes to our methods, practices and policies for the protection or governance of personal information.

## **10. Changes to the privacy policy**

**Réseau** may unilaterally change this personal information protection policy. Before any changes come into effect, however, **Réseau** will issue a notice on its Website listing the upcoming changes. We encourage you to review this Policy occasionally and check whether it has been changed. To help you in doing so, we have included the date of the most recent update of this Policy.

If you have provided us with your email address, you will also receive that notice or a similar notice by email. Your use of the Website, your provision of your personal information to an authorized **Réseau** representative or your entering your personal information into a **Réseau** form following the reception of that version will be considered to be acceptance of the changes.

## **11. Other**

If you have any questions about any of your rights, want to ask questions of **Réseau** or have any other comments, please contact the Personal Information Protection Officer.

C/O: Pascal Harvey, responsable de la protection des renseignements personnels  
Réseau des SADC et CAE  
3229, chemin des Quatre-Bourgeois, bureau 505  
Québec (QC) G1W 0C1

Email address: [pharvey@sadc-cae.ca](mailto:pharvey@sadc-cae.ca)

This policy last updated: 24 september, 2024