



L'Ombre-Elle

**CONFIDENTIALITY AND PROTECTION OF PERSONAL
INFORMATION POLICY**

L'Ombre-Elle

Adopted on December 5, 2023

TABLE OF CONTENTS

- Document history3
- Subject3
- Scope of application.....3
- Application of the policy.....3
- Roles and responsibilities of team members.....4
- Our commitment4
- 1. Protect personal and confidential information that we collect and control ...4
- 2. Where personal information is collected, notify the individual at the time of collection5
- 3. Collect only information that is necessary and useful5
 - Information relating to our clientele.....5
 - Information relating to employees and candidates.....5
 - Information relating to interns, contractors and volunteers.....6
 - Information relating to donors6
- 4. Where required, obtain consent when collecting, using or sharing personal information.....6
- 5. Retain your personal information only as long as is necessary for the specific purpose.....7
- 6. Take appropriate steps to protect personal information7
- 7. When requested, inform individuals of the specific personal information that we retain7
- 8. Handle complaints in a timely and confidential manner8
- 9. The use of cookies9

DOCUMENT HISTORY

Creation date	November 2023
Version xx	Modification date

SUBJECT

The purpose of this policy is to encourage responsible practices when using and managing personal information as required under the *Privacy Act*.

More specifically, the Confidentiality and Protection of Personal Information Policy aims to set out the ways in which L'Ombre-Elle is committed to protecting the confidentiality of the personal information that it collects. It also aims to set out the processes that L'Ombre-Elle has put in place to handle complaints related to the protection of personal information and confidentiality incidents.

SCOPE OF APPLICATION

This policy applies to personal and confidential information that is collected, used, retained or shared by L'Ombre-Elle. The policy primarily applies to information held by L'Ombre-Elle that is related to its donors and the organization's activities, and information regarding its clientele, members of its Board of Directors, employees, individual members and volunteers.

This policy applies to individuals involved with the organization in any way, including women, children, directors, donors, employees, volunteers, partners and any individuals who visit a L'Ombre-Elle premises.

It also applies to our dealings with third parties and service providers that handle confidential information on behalf of L'Ombre-Elle.

APPLICATION OF THE POLICY

The person responsible for the protection of personal information (hereafter the Chief Privacy Officer) and the Board of Directors are responsible for the implementation and application of this Confidentiality and Protection of Personal Information Policy.

Once this policy takes effect, administrators, managers, employees, interns and volunteers must sign a Confidentiality Agreement.

If any of these individuals violate the policy, they will be subject to disciplinary measures considered appropriate by L'Ombre-Elle, which may include dismissal or exclusion.

This policy takes effect on December 6, 2023. It has been published on our website.

ROLES AND RESPONSIBILITIES OF TEAM MEMBERS

Each member of the L'Ombre-Elle team has signed a Confidentiality Agreement as part of their employment contract. They undertake to keep all personal information collected by them or by any other person confidential and to respect this policy.

The Chief Privacy Officer at L'Ombre-Elle is appointed in writing by the Board of Directors.

Their responsibilities include:

- Ensuring that steps are taken to protect personal information from when it is collected to when it is destroyed.
- Responding to requests to access, update and disclose personal information to third parties.
- Receiving confidentiality complaints and incident reports, documenting them and ensuring they are handled.
- Creating and updating a log of confidentiality incidents.

OUR COMMITMENT

L'Ombre-Elle undertakes to:

1. Protect all personal and confidential information that it collects and controls.
2. Where personal information is collected, notify the individual in question at the time of collection.
3. Collect only information that is necessary and useful.
4. Where required, obtain consent when collecting, using or sharing personal information.
5. Retain your personal information only as long as is necessary for the specific purpose.
6. Take appropriate steps to protect personal information.
7. When requested, inform individuals of the personal information we retained that relates to them.
8. Handle complaints in a timely and confidential manner.

1. PROTECT PERSONAL AND CONFIDENTIAL INFORMATION THAT WE COLLECT AND CONTROL

L'Ombre-Elle is responsible for the personal information that it holds and manages. L'Ombre-Elle will put in place appropriate measures to provide a comparable level of protection when personal information is processed by a third party. L'Ombre-Elle has introduced policies and procedures aimed at protecting personal information. L'Ombre-Elle has appointed a Chief Privacy Officer to oversee any privacy issues encountered within the organization. We also provided training for our employees regarding our policy and their role in the protection of personal information.

2. WHERE PERSONAL INFORMATION IS COLLECTED, NOTIFY THE INDIVIDUAL AT THE TIME OF COLLECTION

When L'Ombre-Elle collects personal information, the organization will inform you either verbally, in writing or by email as to why your information was collected, what we intend to do with your information and who we may share it with.

Except where required or permitted by law, L'Ombre-Elle will not disclose, without your consent, information for purposes other than those for which it was collected. Personal information is only shared with individuals who require it to carry out their work.

3. COLLECT ONLY INFORMATION THAT IS NECESSARY AND USEFUL

L'Ombre-Elle limits the amount of personal information that it collects and will only request information that is reasonably required for its activities and services. We only collect personal information that is considered necessary for the file in question. All information is treated as confidential.

Information relating to our clientele

L'Ombre-Elle collects, uses, retains and discloses information relating to its clientele for the following purposes:

- Building and maintaining support relationships.
- Understanding needs and preferences.
- Offering support services and accommodation that suit each client's reality.
- Ensuring the safety of all individuals.

Information relating to employees and candidates

L'Ombre-Elle collects personal information relating to its employees in order to pay their wages, comply with current legislation, provide employee benefits, use performance management tools and improve or manage employee programs, policies and relations, for emergency preparedness purposes, and in general, to establish, manage or terminate employment relationships.

L'Ombre-Elle also collects personal information relating to individuals seeking employment with L'Ombre-Elle in order to select candidates and ensure that the most qualified individuals are hired for the positions in question.

Where necessary, personal information collected by L'Ombre-Elle may be transferred to our insurance and employee benefits providers, pension plan administrators and any other

company involved in providing contractual activities on our behalf. This personal information will also be used solely for the purposes for which it was collected.

Information relating to interns, contractors and volunteers

L'Ombre-Elle collects personal information relating to interns, contractors and volunteers which is required for managing the internship, contract or volunteer relationship.

Information relating to donors

L'Ombre-Elle places great importance on its donors who trust the organization and choose to support it. As a result, it always strives to limit the collection and use of personal information relating to its donors and to keep such information confidential. No information is disclosed without the donor's consent.

4. WHERE REQUIRED, OBTAIN CONSENT WHEN COLLECTING, USING OR SHARING PERSONAL INFORMATION

An individual's consent to the collection, use, and retention of personal information is generally implied at the time it is collected. Signing a contract, requesting assistance or accommodation or making a donation are all considered implied consent to collect and use the information required to create a file.

However, where the information collected is sensitive in nature, specific consent will be sought and the reasons for collecting the information will be clarified. Information may only be collected for these reasons. Where information is collected for another reason, the individual's consent will be obtained once more. Consent is valid only for the time required to carry out the activities for which the personal information was collected. L'Ombre-Elle will consider the sensitivity of personal information when choosing the format and method for obtaining consent.

Personal information relating to a minor under 14 will be collected from the minor with the consent of their legal guardian, except where such collection is clearly for the benefit of the minor in question.

L'Ombre-Elle will request your consent before disclosing your personal information to a third party, except where exceptions are provided by law. Where an employee accepts an offer of employment or employee benefits, their acceptance generally constitutes consent that authorizes L'Ombre-Elle to collect, use and disclose personal information for all identified purposes.

Individuals who give such consent may withdraw it at any time by submitting a written request if the consent was granted in writing. Otherwise, a verbal request is sufficient.

5. RETAIN YOUR PERSONAL INFORMATION ONLY AS LONG AS IS NECESSARY FOR THE SPECIFIC PURPOSE

L'Ombre-Elle will retain personal information only as long as necessary for the identified purposes, or as required or permitted by law.

6. TAKE APPROPRIATE STEPS TO PROTECT PERSONAL INFORMATION

Personal information may be stored on various media including paper and digital files, and secure access controls have been put in place. In all cases, personal information will only be accessed by individuals within L'Ombre-Elle who have the appropriate authorization to do so. The information must be required for them to perform their duties.

L'Ombre-Elle will protect personal information by taking appropriate security measures against the risk of loss, theft and unauthorized access, disclosure, copying, use, modification or destruction, regardless of the format used to retain the information. The organization will consider the information's level of sensitivity when determining the level of protection required. L'Ombre-Elle will carefully destroy personal information in order to prevent unauthorized access. In the event of a security breach, the organization will endeavour to limit any potential harm.

All employees who have access to personal information must keep such information confidential and private.

L'Ombre-Elle will protect personal information transferred to third parties where the contractual agreements stipulate that the third party must respect the confidentiality of the personal information and meet all legal requirements.

L'Ombre-Elle has entered into agreements with one or more IT service providers to retain/store personal information and ensure that such information is protected and remains confidential. This undertaking was included in L'Ombre-Elle's contract with its IT service providers. The service providers must also specify in their contract which means they have taken to protect personal information and ensure it will only be used for the purposes of the contract.

L'Ombre-Elle has also included a clause in the contracts with its IT service providers that it be notified in the event of a privacy incident involving personal information that it has collected.

7. WHEN REQUESTED, INFORM INDIVIDUALS OF THE SPECIFIC PERSONAL INFORMATION THAT WE RETAIN

When requested, L'Ombre-Elle will allow individuals to review the personal information relating to them that L'Ombre-Elle has retained. Individuals who wish to access retained

personal information relating to them must submit a written request to L'Ombre-Elle. The request must specify the information requested, the name and contact details (mailing address, email address, phone number) of the individual submitting the request, and include proof of identity. Requests to correct or delete personal information may also be submitted.

When requested, accessibility measures will be taken to ensure that persons with disabilities can exercise their right to access or correct their personal information.

L'Ombre-Elle will undertake to respond within 30 days of the day on which the request is received.

All requests by a third party for the communication of personal information must also be submitted in writing. In the vast majority of cases, L'Ombre-Elle will obtain written consent from the individual in question before disclosing personal information to a third party. L'Ombre-Elle may also disclose personal information without the consent of the individual in question where required to do so by law. In such cases, it will ensure that it discloses only the personal information required by law and by the circumstances of the disclosure request.

In certain circumstances, L'Ombre-Elle may be unable to provide access to all retained personal information relating to an employee, woman or child. For example, L'Ombre-Elle will not grant access to reveal personal information relating to a third party, unless the requested information can be separated from the file or if the third party consents to the disclosure of their personal information. Other reasons for denying access include, but are not limited to, situations where the disclosure could reasonably endanger the life, health or safety of another individual, personal information protected by solicitor-client privilege, or communications that could reveal personal information collected during an investigation or disclosure that violates an agreement or a law. Where L'Ombre-Elle denies access to an individual's personal information, it will confirm the reasons behind the refusal.

You can also submit a request to L'Ombre-Elle to update personal information where the information is outdated, inaccurate or incomplete. L'Ombre-Elle will promptly amend all personal information that is inaccurate or incomplete. Any unresolved discrepancies relating to the accuracy of personal information will be noted in the individual's file.

8. HANDLE COMPLAINTS IN A TIMELY AND CONFIDENTIAL MANNER

All complaints relating to this policy or to the protection of personal information must be submitted in writing and include the individual's name, contact information and the reason or reasons for the complaint. All complaints will be forwarded to L'Ombre-Elle's designated Chief Privacy Officer.

L'Ombre-Elle undertakes to handle all complaints in a confidential manner and to respond no later than 30 days after the complaint receipt date, provided it has obtained all the information required to adequately handle the request.

The Chief Privacy Officer must also investigate in the event of a privacy incident and promptly notify the individuals affected by the incident and the *Commission d'accès à l'information* (access to information commission) where required, i.e., if the incident presents a risk of serious harm. Furthermore, the Chief Privacy Officer is responsible for identifying reasonable measures to reduce the risk of harm to the individuals affected by the incident and to prevent further incidents of the same nature.

9. THE USE OF COOKIES

This site does not install permanent cookies on the hard drives of visitors' computers, but it does place a temporary cookie required to improve the performance of certain website features.