# **Confidentiality Policy**



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## 1. City's undertaking

This confidentiality policy aims to inform citizens of the City of Dorval's (hereinafter the "City") practices put in place to protect the confidentiality and security of the personal information it holds.

This privacy policy concerns you. It describes how we collect, use, release, keep, and destroy your Personal Information. It also specifies how you can request access to this information or have it corrected, when necessary.

The City of Dorval is committed to protecting the confidentiality and security of your Personal Information in accordance with this policy as well as the provisions of the *Act respecting access to documents held by public bodies and the protection of personal information* as amended by the *Act to modernize legislative provisions relating to the protection of personal information*, also called Law 25.

#### 2. What is a "Personal Information"?

By "Personal Information" we mean information concerning a natural person which, on its own or with other information, directly or indirectly allows the person to be identified, located, or contacted.

#### 3. How and why do we collect your Personal Information?

As part of its activities, programs, and services offered to citizens, the City collects your Personal Information by various means:

- Verbally (by telephone or at our service counters);
- In writing (via email, letter, or paper forms);
- Online when you browse our website, download one of our mobile applications, or complete one of our various forms accessible online, for example:
  - Online requests:
  - Online ticket service;
  - Registration form to our sports or leisure activities:
  - Service subscription form;
  - Animal registration form;
  - Claim form or other service request;
  - Permit or certificate application form;
  - Application form for a financial assistance or a support program:
  - Contest registration form;
  - Reimbursement request form;
  - Online survey;
  - Payment of a tax bill, an invoice, or a fine.

We collect your Personal Information to serve you, answer your questions, process your requests, exercise our administrative and legal obligations, and manage our website and other applications.

Suppliers who assist us in processing payments or communicate with you will also have access to some of your information to better serve you. Like most websites and other online services, we may automatically collect certain technical or device-related information about your usage of our services.

This information may include your device's unique identifier, information about your device, your browser and your operating system, and the date and time you visited our website.

Our website may use cookies or similar or equivalent technologies such as beacons or pixels to offer you a richer browsing experience, improve its performance, and generate audience statistics.

These are files that are installed on your computer's hard drive or browser to collect information such as your preferred language, your browsing history, the type and the version of the browser you are using.

You can change the settings of your browser to refuse all cookies or to notify you when a cookie is being sent. Each browser provides instructions to this effect in its settings.

## 4. Which Personal Information do we collect and why?

We only collect Personal Information that we need to provide our municipal services. Therefore, we may collect the following information:

## Information concerning your identity:

- Last name, first name;
- Residence or postal address;
- Telephone number;
- Email address;
- Date of birth if there is a minimum or maximum age required;
- Social insurance number if a tax receipt must be issued.

**Why**: This information is required to process your request for information, your complaints or other inquiries, your registration requests for an activity or a program, or your subscription requests to one of our services.

#### 1. Information concerning your health:

- Health issues:
- Allergies;
- Family medical history;
- Health insurance number and expiration date:
- Medication list.

**Why**: This information is required to ensure your health and safety in the event of an emergency, incident, or special need when you register for a sporting or leisure activity or a support program for which specific eligibility criteria are applicable.

## 2. Information concerning your children:

- First and last names of the child;
- Health insurance number and expiration date;
- Child's date of birth and age;
- Parents' contact information;
- Contact information of two people to contact in case of an emergency;
- Medical history and medications;

- Tetanus vaccine status (up to date or not);
- Indication if the child has an illness and is receiving special treatment;
- Allergies;
- Child's special needs.

**Why**: This information is required to ensure the health and safety of your children in the event of an emergency, incident or special need during sports or leisure activities to which they registered, or to be eligible to a support program for which eligibility criteria apply.

#### 3. Financial information:

- Family income;
- Sources of income;
- Information regarding rent supplement;
- Information regarding social assistance received.

**Why**: This information allows us to determine your needs and your eligibility for some of our financial assistance or support programs offered in particular by our Community Aid Division.

## 4. Information concerning your property:

- Address:
- Plans;
- Certificate of location;
- Photos (exterior and interior);
- Costs of projected work;
- Contractor's contact information.

**Why**: This information is required to study your permit or certificate applications or other enquiries regarding your property, and to ensure the required follow-up.

#### 5. Information concerning employees or job candidates:

- Last name, first name;
- Postal address or address of residence;
- Email address;
- Resume:
- Social insurance number;
- Copy of diplomas and/or transcript of records:
- Pieces of ID;
- Employment references;
- Background check;
- Disciplinary notices;
- Banking information.

**Why**: This information is required to review job applications, communicate with candidates, ensure the payment of employees, and issue any documents necessary to the employee for tax purposes or insurance coverage and other employee benefits.

#### 6. Information concerning browsing activity on our website:

Log files or cookies;

- · Online comments;
- User behavior analysis system.

Why: This information allows us to generate statistics, measure how visitors use our website, which pages are popular and what our traffic sources are. This helps us improve how our website works. The information is aggregated and anonymous and cannot be used to identify you. If you do not allow these cookies, we will not be able to use your visits to our website to compile statistics and contribute to improvements.

#### 5. How do we use and to whom do we release your Personal Information?

The City makes Personal Information accessible only to employees or categories of employees of the City who must have access to this information in the performance of their duties. It keeps a register of these employees or categories of employees and this Personal Information is only used by these same employees.

In addition to the uses described in section 4 of this policy, we may use and disclose your Personal Information when such use or disclosure is authorized, necessary or appropriate, such as in the following cases:

- Comply with our legal obligations;
- Prevent cyber threats and fraud;
- Comply with applications, warrants, and court orders;
- Protect your rights and interests as well as ours:
- Collaborate in legal proceedings or investigations.

We will not sell or rent your Personal Information to third parties. We will not share your information with third parties without your consent, unless permitted or required by law, or unless we need to disclose your information for the purposes listed above.

Under certain circumstances, we use service suppliers or partners to help us serve you. When we provide them with your Personal Information, we take reasonable steps to ensure:

- The rules set out in this confidentiality policy are applied;
- That your Personal Information is preserved and secure:
- That your Personal Information is used solely for the purposes for which it was provided;
- That your Personal Information is destroyed when no longer required.

We do not authorize service providers to disclose your Personal Information to unauthorized parties or use your Personal Information for direct marketing purposes. If you would like more information on our service providers, please contact us using the contact information in section 12 "Contact Us".

#### 6. Where is your Personal Information stored?

We store and process your Personal Information in Quebec. In certain circumstances, they may be stored outside of Quebec, where we deal with third-party service providers, primarily in Canada and the United States, but also elsewhere in the world.

It is possible that your Personal Information is stored in countries other than your country of residence, which may have different rules for protecting Personal Information. In these cases, this information is subject to the laws of the country in which this information is stored and may be disclosed to the governments, courts, or law enforcement or regulatory agencies of the country in question.

However, our practices regarding your Personal Information remain at all times governed by this policy and by the applicable Quebec laws regarding the protection of Personal Information.

## 7. How long do we keep your Personal Information?

We will keep your Personal Information for as long as necessary for the purposes for which it is intended, to fulfill the purposes for which such Personal Information was collected and as permitted or required by law.

Subject to applicable preservation rules, we delete obsolete or unnecessary Personal Information, for example, if you tell us that you permanently stop using our services. You can request the rectification or deletion of information at any time by contacting us using the contact information in section 12 "Contact Us".

## 8. How do we protect your Personal Information?

#### Measures

We implement physical, administrative, and technical protective measures to ensure the confidentiality and security of the Personal Information we hold, in particular to prevent unauthorized access.

We have a plan in the event of an incident involving Personal Information. It provides that we notify the authorities and the persons concerned when such an incident presents a risk of serious harm and that we put in place measures to limit the negative consequences.

## Limitation of access

Only authorized personnel whose functions require them to be able to consult your Personal Information in the performance of their duties have access to it. In addition, employee accounts and access to servers and applications are subject to up-to-date security regulations, including, among others, double authentication.

#### Warning

No security measure is absolute or fully guaranteed. If you have reasons to believe that your interaction with us is no longer secure (for example, if you believe that the security of the information you have provided to us has been compromised), please contact us immediately using the contact details provided in the section 12 "**Contact us**".

#### 9. When does this policy not apply?

This policy does not apply to websites operated by third parties over whom we have no control. If you follow a link to a third-party website (to register for an event for example), the privacy policy of that third-party website will apply. We are not responsible for their privacy policies, procedures, or practices. We encourage you to review these policies before submitting Personal Information to these websites.

#### 10. What are your rights regarding your Personal Information?

#### Access, correction, and deletion

You may request access to the Personal Information that we hold about you and, if necessary, request corrections, as permitted or required by law. You can also request the deletion of outdated or unjustified information or provide written comments.

However, to ensure that the Personal Information we hold about you is accurate and up to date, please inform us promptly of any changes.

At your request, and unless this raises serious practical difficulties, we may communicate to you computerized Personal Information in a structured and commonly used technological format.

## Withdrawal of your consent

You can also withdraw your consent to the use and release of the Personal Information collected. However, certain services require the use of your Personal Information. By withdrawing your consent, we may no longer be able to provide these services to you. Some information collected may not be retrievable by law (For example: taxation, billing, offences, etc.).

To exercise your rights, write to us at the address indicated in section 12 "Contact us". Please note that we may ask you for identification to ensure it is you.

To find out more about the rights conferred on you by Quebec laws that protect your privacy, consult the following link: <a href="https://www.cai.gouv.gc.ca/lois-et-reglements">https://www.cai.gouv.gc.ca/lois-et-reglements</a>

## 11. Coming into force and update of the Policy

This policy is in effect on the date of its adoption by the municipal council.

We reserve the right to modify this policy from time to time. When we make changes to this policy, they will be effective immediately when notice of the changes is made available to you on our website.

If we make significant changes to this policy, to comply with new legal requirements for example, we will notify you one month in advance via our website and newsletter so that you can make an informed choice regarding your use of our services.

#### 12. Contact us

You can direct any requests, questions, complaints, or comments regarding this policy to our Person in charge of the protection of personal information:

Person in charge of the protection of personal information Me Louiza Sadoun <a href="mailto:lsadoun@ville.dorval.qc.ca">lsadoun@ville.dorval.qc.ca</a>
514 633-4141