

C.P.E. DORVAL

Privacy Policy

(re: loi 25)



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PREAMBLE

This “Privacy Policy” regarding the Protection of Personal Information (hereinafter the "Policy") is adopted pursuant to the [*Act respecting the protection of personal information in the private sector, c. P-39.1*](#) (hereinafter the "*Private Sector Act*").

CPE Dorval (hereinafter "CPE") is a non-profit legal entity that processes personal information during its activities. It is therefore subject to the *Private Sector Act*.

During its activities, the CPE must collect, use, and retain personal information in accordance with the *Act respecting educational childcare services*, the *Regulation respecting educational childcare services*, the *Regulation respecting reduced contributions* and the directives and instructions of the *Ministère de la Famille* (hereinafter the “MF”).

This Policy applies to the CPE, including its staff members, members of the Board of Directors, interns and volunteers, parent users and children, as well as to any person who otherwise provides services on behalf of the CPE.

The Privacy Policy references our practices regarding the collection, use, retention, and processing of your personal information when you use our sites, products and services. It also sets out your rights regarding our possession of your information.

DEFINITIONS

“Personal information” is defined as any information relating to a natural person that allows, directly or indirectly, that person to be identified. It applies to all personal information collected, used, and retained by the CPE.

"Site" refers to the website operated by CPE Dorval, their sub-domains, and content.

“Products” refer to the software and the applications that you can access, install, and download from our site.

“Services” refers to the daily childcare services we offer your children.

If you do not agree with any part of this Policy, please do not use or access our Sites, Products, and Services.

This Policy covers personal information contained in all types of physical or digital documents, in the broadest sense, whether in written, graphic, sound, visual, computerized, etc.

It also applies to the CPE website, where applicable.

The APPENDICES at the end form an integral part of the Policy.

1. OBJECTIVES

This Policy describes the standards for collecting, using, communicating, and retaining personal information to ensure its protection. It also explains the roles and responsibilities of CPE staff members throughout the life cycle of this information, and a process for handling complaints concerning the protection of personal information.

2. PERSONAL INFORMATION

During its activities, CPE Dorval may collect and process various types of personal information, including but not limited to:

- identity information, such as first or last name, age, date of birth;
- contact details, address, e-mail address, and telephone number;
- information required when registering a child at the CPE, including the registration form, service agreement, social insurance number, bank account information for pre-authorized debits, etc.
- information required to compile the file of parents applying for eligibility for the reduced contribution, such as the application for the reduced contribution, the parent's certificate, documents establishing Canadian citizenship, and the child's certificate or birth certificate, government correspondence with the parent, etc.
- information required during a child's attendance, including but not limited to attendance records, incident reports, documents related to the administration of medication, parents' instructions related to their child's dietary restrictions, if any, etc.;
- the information needed to compile a child's educational file, in particular the progress reports, professional reports relating to special needs children, etc.;
- information relating to CPE staff members, trainees or volunteers, including personnel files, training certificates, documents relating to verification of impediments, etc.;
- any other personal information required for its activities.

3. COLLECTION

CPE Dorval collects personal information concerning the parent users, children attending the CPE, volunteers, students, and its staff; in general, the information comes directly from the person concerned AND with his or her consent, or prior knowledge, unless an exception is provided for by law.

Consent may be implied in certain situations, for example, when an individual decides to provide his or her personal information voluntarily during CPE activities, such as when registering a child or when being hired.

In all cases, the CPE will only collect personal information if it has a valid reason to do so. In addition, the collection of personal information will be limited to that which is necessary to fulfill the purpose for which it is collected.

Unless an exception is provided for by law, the CPE will seek the consent of the person concerned before collecting personal information about him or her from a third party.

4. USE

CPE Dorval undertakes to use personal information in its possession only for the purposes for which it was collected and for which it is authorized by law to use it. The CPE may, however, collect, use, or disclose personal information without the consent of the individual to whom it relates, where permitted or required by law.

In certain circumstances, the CPE may collect, use, or disclose personal information without the knowledge or consent of the individual concerned. Such circumstances may arise when, for legal, medical or security reasons, it is impossible or unlikely to obtain consent, when such use is clearly for the benefit of the individual concerned, when it is necessary to prevent or detect fraud, or for any other serious reason.

CPE Dorval limits access by staff, Board members, and other sources (e.g., auditors, government offices, resource personnel, etc.) to personal information and knowledge of a personal nature that is necessary for the performance of their duties.

5. COMMUNICATION

In principle, the CPE cannot communicate the personal information it holds on a person without that person's consent.

However, the CPE may disclose personal information to a third party without the consent of the person concerned when the disclosure is due to a regulatory, legal, or safety / emergency requirement, or when the *Privacy Act* or any other law so permits.

6. CONSERVATION

During its daily activities, the CPE must keep numerous documents containing personal information. Certain documents must be kept for a period prescribed by the *Act respecting educational childcare services*, the *Regulation respecting educational childcare services*, the *Regulation respecting reduced contributions*, as well as by directives and instructions from the *Ministère de la Famille*.

The document entitled “*Conservation Calendar Timeline*,” is to be used as a reference tool indicating the duration of time that some documents are to be maintained as property of the CPE. **Please note this document is subject to change.** It is the responsibility of the Executive Director of the CPE to ensure its relevance and correctness.

Quality of personal information

CPE Dorval ensures the quality of the personal information it holds. In this sense, the personal information kept is up to date, accurate, and complete to serve the purposes for which it was collected or used.

Personal information does not need to be kept up to date unless it is necessary for the purposes for which it was collected. However, if the information is to be used to reach a decision, it must be up to date at the time the decision is made.

Physical and digital documents

Depending on the nature of the personal information, the data may be stored in multiple locations and in different formats. For example, data may be stored at CPE offices, in various computer systems of the CPE or its service providers, or in storage facilities of CPE or its service providers. Service providers may include, but are not limited to the auditor, self-employed bookkeepers, payroll companies, pension and insurance companies, first-aid companies, etc.

Safety measures

The security and protection of personal information is important to CPE Dorval. The CPE implements security measures to ensure that personal information remains strictly confidential and is protected against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

These security measures may include organizational measures such as restricting access to what is necessary; backing up and archiving data using an external system, etc.); keeping written documents under lock and key; and technological measures such as the use of passwords and encryption (for example, frequent password changes and the use of firewalls).

Document scanning

If the CPE chooses to destroy the original documents following their digitization, it must comply with the following conditions:

1. The information contained in the digitized documents has not been altered and has been maintained in its entirety;
2. The digitization process, and the medium used to store the digitized documents, must ensure the stability and longevity of the documents.

The CPE will choose a medium or technology on which to store its documents that enables it to comply with these conditions. The CPE records the scan in the Scan Register provided in **APPENDIX 1**.

7. DESTRUCTION

Original documents containing personal or confidential information are securely destroyed.

The CPE uses final document destruction techniques adapted to the level of confidentiality of the document to be destroyed (e.g., shredding). It refers to **APPENDIX 2** for OUR DESTRUCTION PROTOCOL. When destroying documents containing personal information, the CPE completes the Destruction Register provided in **APPENDIX 3**.

8. PRIVACY IMPACT ASSESSMENT

CPE Dorval must carry out a Privacy Impact Assessment (PIA) for all information system acquisition, development, and redesign projects, or electronic service delivery projects, involving personal information.

The privacy impact assessment carried out must be proportionate to the sensitivity of the information concerned, the purpose for which it is used, its quantity, distribution, and medium.

The CPE can use the guide developed by the Commission d'accès à l'information "[Guide d'accompagnement - Réaliser une évaluation des facteurs relatifs à la vie privée](#)" to carry out the privacy impact assessment, if necessary.

9. REQUEST FOR ACCESS OR CORRECTION

Any person may request access to or correct their own personal information held by the CPE.

The person concerned must submit a written request to this effect to the CPE Privacy Officer.

Subject to certain legal restrictions, individuals may request access to and correction of their personal information held by the CPE if it is inaccurate, incomplete, or ambiguous.

The CPE Privacy Officer must respond in writing to such requests within 30 days of receipt.

10. PRIVACY INCIDENTS

Confidentiality incidents

A confidentiality incident is any unauthorized access, use, or disclosure of personal information, as well as its loss or any other form of breach of confidentiality.

If the Privacy Officer of the CPE has reason to believe that a confidentiality incident involving personal information in its possession has occurred, it will take reasonable measures to reduce the risk of harm being caused and to prevent similar incidents from occurring in the future.

In the event of a confidentiality incident, the Privacy Officer must assess the damage. This assessment considers, among other things: the sensitivity of the personal information concerned; the possible malicious uses of the information and the apprehended consequences of the use of the information; and the likelihood of the information being used for harmful purposes.

When the incident presents a risk of serious harm to the persons whose information is involved, the Privacy Officer of the CPE notifies in writing:

- The **Commission d'accès à l'information** via the prescribed [notice form](#) ;
- The person(s) concerned. The notice must provide adequate information on the scope and consequences of the incident. This notice must contain :
 - A description of the personal information involved in the incident. If this information is not available, the organization must provide the reason why this description cannot be provided.
 - A brief description of the circumstances surrounding the incident;
 - The date or period when the incident took place, or an approximation of this period if not known;
 - A brief description of the measures taken or envisaged to reduce the risk of damage being caused as a result of the incident;

- Measures proposed to the person concerned to reduce the risk of harm being caused or to mitigate it;
- The contact details of a person or department that the person concerned can contact to obtain further information about the incident.

Register of confidentiality incidents

The CPE keeps a register of confidentiality incidents, as described in **APPENDIX 4**.

The register records all confidentiality incidents involving personal information:

- those that do not present a risk of serious harm and;
- those presenting a risk of serious harm.

The information contained in the confidentiality incident register is kept up to date and retained for a minimum period of five (5) years after the date or period during which the CPE became aware of the incident.

11. PRIVACY COMPLAINT HANDLING PROCESS

Any person concerned by the application of this Policy may lodge a complaint concerning the application of this Policy or, more generally, concerning the protection of his or her personal information by the CPE.

The procedure for handling privacy complaints is set out in **APPENDIX 5**.

12. CONTACT DETAILS OF THE PRIVACY OFFICER

The CPE Dorval Privacy Officer, **Patricia Bruno**, holding the formal employment position of **Executive Director** can be contacted by telephone at **(514) 631-6884** or by e-mail at **directrice@cpedorval.org**. The CPE Privacy Officer may be contacted for any questions relating to the application of this Privacy Policy.

13. EFFECTIVE DATE OF THE POLICY

The Policy takes effect on September 22, 2023.

The Policy has been approved by the Privacy Officer, Patricia Bruno.

If the CPE modifies this Policy, the modified policy will be made available.

APPENDIX 1 - SCANNING REGISTER

CPE Scan Register				
Scan date	Description of document(s)	Recording locations	Paper destruction (yes/no)	Scanning made by

APPENDIX 2 - FINAL DOCUMENT DESTRUCTION PROTOCOL

Permanent document destruction techniques¹

Media used	Examples of destruction methods
Paper (original and all copies)	- Shredder, preferably cross-cutting If documents are highly confidential: shredder + incineration
Digital media to be reused or recycled e.g., flash memory cards (SD, XD, etc.) USB sticks, computer hard drives	- Formatting, rewriting, digital shredding (software that performs a secure deletion and writes random information to the location of the deleted file).
Non-reusable digital media e.g., certain CDs, DVDs, flash memory cards, USB sticks, and hard drives that will no longer be used	- Physical destruction (shredding, crushing, surface grinding, disintegration, drilling, incineration, etc.). Most shredders are capable of destroying CDs and DVDs. - Demagnetizer for hard disks.
Machines with hard disks e.g., photocopier, fax machine, scanner, printer, etc.	- Overwriting of information on hard disk, or hard disk removed and destroyed when machines are replaced.

¹ Commission d'accès à l'information, Destruction procedure, online : <https://www.cai.gouv.qc.ca/entreprises/procedure-de-destruction/>

APPENDIX 3 - DESTRUCTION REGISTER

[illegible]

APPENDIX 4 - CONFIDENTIALITY INCIDENT REGISTER

Register of confidentiality incidents								
Date or period of incident	Persons concerned (compromised information)	Description of incident	Incident awareness	Number of people affected by the incident	Description of the factors leading to the decision	Date notice sent to Commission d'accès à l'information	Date of transmission of notices to the persons concerned	Description of measures taken to reduce the risk of harm being caused

APPENDIX 5 – COMPLAINT PROTOCOL RELATED TO THE PROTECTION OF PERSONAL INFORMATION

Receipt of complaint

Any person who wishes to make a complaint regarding the application of this policy or, more generally, regarding the protection of his or her personal information by CPE Dorval, must do so in writing to the CPE Privacy Officer.

The individual must provide his or her name, contact information, including a telephone number, as well as the subject and reasons for the complaint, in sufficient detail to allow the complaint to be evaluated by the CPE. If the complaint is not specific enough, the Privacy Officer may request any additional information he or she deems necessary to assess the complaint.

Complaint handling

CPE Dorval undertakes to treat all complaints received confidentially.

Complaints are processed within a reasonable time. The Privacy Officer shall evaluate the complaint and provide a written response to the complainant, stating the reasons for the complaint.

The purpose of this assessment will be to determine whether the CPE's handling of personal information complies with the present policy and practices in place within the organization and with applicable legislation or regulations.

Complaint file

The CPE must establish a separate file for each complaint addressed to it under the present complaint handling procedure. Each file contains the complaint, the analysis and documentation supporting its evaluation, as well as the written response sent to the complainant.