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Privacy policy

Corporation Concept Alpha de Rouyn-Noranda respects each individual's right to privacy and is committed to protecting the confidentiality of confidential information collected from any Participant or Employee. As a general rule, confidential information is available only to those persons who require access to it in the performance of their duties at Corporation Concept Alpha de Rouyn-Noranda.

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DEFINITIONS

"Employe

Any person who works for Corporation Concept Alpha de Rouyn-Noranda for remuneration, including coordination or management, as well as any unpaid person (volunteer, trainer).

"Event

Any event managed or organized by Corporation Concept Alpha de Rouyn-Noranda.

"Report form

The form made available to any Employee or Participant to inform the person responsible for personal information.

"Privacy incident "

Any unauthorized access, use or disclosure of personal information, as well as its loss or any other form of breach of its protection.

"Participant

Any individual who provides confidential information to Corporation Concept Alpha de Rouyn-Noranda in connection with the realization of an Event, the creation of a Publication, participation in an activity or with obtaining a Service.

"Publication "

Any publication produced by Corporation Concept Alpha de Rouyn-Noranda or to which Corporation Concept Alpha de Rouyn-Noranda contributes, in any form whatsoever (verbal, written, audio, video, computerized or other).

"Privacy incident register

All information recorded on reported incidents concerning the circumstances of the incident, the number of people involved, the assessment of the seriousness of the risk of harm, and the measures taken in response to the incident. Relevant dates are also included: incident occurrence, detection by the organization, notification (if applicable), etc.

"Serious risk of damage

The risk assessed following a confidentiality incident that could harm the individuals concerned. This risk is analyzed by the person responsible for personal information. For each confidentiality incident, the person responsible assesses the seriousness of the risk of harm to the persons concerned, by estimating "the sensitivity of the information concerned", "the apprehended consequences of its use" and "the probability that it will be used for harmful purposes".

"Confidential information "

Any information provided or communicated to Corporation Concept Alpha de Rouyn-Noranda in any medium whatsoever (verbal, written, audio, video, computerized or other) that concerns a Participant or Employee and that can be used to identify him or her, including: name, telephone number, address, e-mail address, the fact that he or she was or is a Participant

or a potential Participant's gender, sexual orientation and any information concerning his/her health. For further information :

- information that does not allow an individual to be identified in testimony is not confidential information;
- statistical data is not confidential information, since it cannot be used to identify an individual;
- photographs or recordings that do not identify an individual do not constitute confidential information about that individual.

"Service or activity

Any service that Corporation Concept Alpha de Rouyn-Noranda provides to an individual at his or her request, or any activity in which he or she participates.

PHOTOGRAPHS AND RECORDINGS

2.1

Anyone can choose whether or not to be photographed or recorded (audio/video).

2.2

Photographs or recordings that identify an individual as an Employee of Corporation Concept Alpha of Rouyn-Noranda do not constitute confidential information about that individual.

OBLIGATION OF CONFIDENTIALITY

3.1

Employees are required to sign this confidentiality agreement (Appendix A) before performing their duties or mandates with Corporation Concept Alpha of Rouyn-Noranda.

3.2

The obligation of confidentiality applies for the duration of an Employee's relationship with Corporation Concept Alpha de Rouyn-Noranda and survives the termination of that relationship.

COLLECTION AND USE OF CONFIDENTIAL INFORMATION

4.1

Corporation Concept Alpha de Rouyn-Noranda may, if necessary, establish one or more files containing confidential information concerning Employees. The purpose of such files is to :

- keep contact details up to date;
- document work or volunteer situations ;
- enable paid employees to carry out administrative tasks required or permitted by the law (income tax, group insurance, etc.).

4.2

Corporation Concept Alpha de Rouyn-Noranda may, if necessary, establish one or more files containing confidential information concerning participants. The purpose of creating such files is to allow Corporation Concept Alpha de Rouyn-Noranda to carry out an event, a publication, an activity or to provide a Service.

4.3

Corporation Concept Alpha de Rouyn-Noranda may only collect confidential information that is necessary for the purposes of the file and may only use confidential information for those purposes.

4.4

Confidential information may only be collected from the person concerned, unless that person consents to collection from another person or unless authorized by law.

CONFIDENTIAL INFORMATION MANAGEMENT

5.1

The person designated as the highest authority in the organization is responsible for ensuring the protection of personal information. Management or coordination may delegate this responsibility by certifying it in writing. On Corporation Concept Alpha de Rouyn-Noranda's main Web site, under the title of the management, coordination or person in charge, "person in charge of the protection of personal information" must be indicated, as well as the means of contacting him or her.

Management, coordination or the person in charge ensures that a confidentiality incident register is kept.

5.2

Subject to section 5.3, management or coordination is authorized to access any confidential information held by Corporation Concept Alpha de Rouyn-Noranda. Other Employees are authorized to access confidential information insofar as such access is necessary to perform a task in the exercise of their duties.

5.3

For legal purposes, a **privacy incident** is any unauthorized access, use or disclosure of personal information, as well as the loss of personal information or any other breach of its protection.

5.4

When an Employee or Participant becomes aware of a confidentiality incident, he or she must diligently inform General Management or the person responsible for protecting confidential information so that it can be entered in the Register. To do this, the employee or Participant must complete a reporting form and forward it to management or the person responsible.

The register must keep information on a confidentiality incident for a period of five years.

Must be collated in the report form:

- A description of the personal information affected by the incident or, if this information is unknown, the reasons why it is impossible to provide such a description;
- A brief description of the circumstances of the incident;
- The date or period when the incident took place (or an approximation if this information is not known) ;
- The date or period when the organization became aware of the incident ;
- The number of people affected by the incident (or an approximation if this information is not available).

5.5

The management, coordinator or person in charge judges whether the incident presents a "serious risk of harm". The information and the measures to be taken to reduce the risk of serious harm to the persons concerned are entered in the Register.

If the incident presents a serious risk of harm, the general management or the person in charge notifies the Commission d'accès à l'information and the persons concerned of any incident presenting a serious risk of harm, using the appropriate form.

5.6 Individualized or small-group support.

Only the person(s) responsible for individualized or small-group training and general management are authorized to access confidential information held by Corporation Concept Alpha de Rouyn-Noranda in connection with this activity.

KEEPING INFORMATION CONFIDENTIAL

6.1

Employees who have access to files pursuant to Article 5 undertake to :

- Ensure that confidential information is kept safe from physical damage or unauthorized access;
- Ensure that all electronic documents containing confidential information, including those copied onto portable storage devices, are encrypted and password-protected. These passwords must be changed twice a year, as well as each time the people with access to the files concerned are replaced;
- Keep confidential information in paper format in lockable filing cabinets, and ensure that the cabinets are locked at the end of each working day. File cabinet keys should be kept in secure locations.

6.2

Where an employee may, in certain respects, also qualify as a participant, confidential information concerning each title will be kept separate.

6.3

Files created under this policy are the property of Corporation Concept Alpha of Rouyn-noranda.

DESTRUCTION OF CONFIDENTIAL INFORMATION

7.1

Subject to section 7.2, confidential information is retained only as long as the purpose for which it was collected has not been fulfilled, unless the individual concerned has consented otherwise. Information is destroyed after 7 years for prosecution or tax purposes. Confidential information is then destroyed in such a way that the data cannot be reconstructed.

7.2

Employee files are kept for a period of 7 years after termination of employment by Corporation Concept Alpha de Rouyn-Noranda.

7.3

For greater certainty, confidential information concerning an individual who has offered a testimonial, such as name and contact information, is destroyed once the testimonial has been published or broadcast, unless the individual has given prior consent for confidential information concerning him or her to be retained to enable Corporation Concept Alpha de Rouyn-Noranda to contact him or her again in the future. For greater certainty, each use of a person's testimonial must be approved by that person.

DISCLOSURE OF CONFIDENTIAL INFORMATION TO A THIRD PARTY

8.1

Other than in situations where required by law and subject to the other provisions of this article 8, confidential information may only be disclosed to a third party after obtaining the written, manifest, free and informed consent of the person concerned. Such consent may only be given for a specific purpose and for the time necessary to achieve that purpose.

8.2

Confidential information may be disclosed without the consent of the person concerned if his or her life, health or safety is seriously threatened. In such a case, disclosure must be made in the manner least harmful to the person concerned.

8.3

As permitted by law, Corporation Concept Alpha de Rouyn-Noranda may disclose confidential information necessary to defend itself or its Employees against any claim or suit brought against Corporation Concept Alpha de Rouyn-Noranda or its Employees, by or on behalf of a Participant, Employee, or any of their heirs, executors, assigns or transferees, including any claim by a Participant's or Employee's insurer.

COMMUNICATION OF CONFIDENTIAL INFORMATION TO

9.1

Subject to article 9.2, Participants and Employees have the right to know the confidential information that Corporation Concept Alpha de Rouyn-Noranda has received, collected and retained concerning them, to have access to such information and to request that corrections be made thereto.

9.2

Corporation Concept Alpha de Rouyn-Noranda shall restrict access to confidential information where required by law or where disclosure would likely reveal confidential information about a third party.

9.3

A Participant's or Employee's request under Article 9.1 must be processed within a maximum of 30 days.

BREACH OF CONFIDENTIALITY

10.1

An employee is in breach of confidentiality when he or she .

- Communicates confidential information to individuals not authorized to have access to it;
- Discusses confidential information inside or outside Corporation Concept Alpha of Rouyn-Noranda when individuals not authorized to have access to it are likely to hear it;
- Leaving confidential information on paper or computer media in plain view in a place where individuals not authorized to have access to it are likely to see it;
- Fails to follow the provisions of this policy.

10.2

In the event of a breach of confidentiality, appropriate disciplinary action, up to and including termination of the employment contract or any other relationship with Corporation Concept Alpha de Rouyn-Noranda, will be taken against the offending party and corrective measures will be taken as necessary to prevent a recurrence.

RECOURS

11.1

If it appears that a person's confidential information has been used in a manner contrary to a provision of this policy, that person may file a complaint with the general management of Corporation Concept Alpha de Rouyn-Noranda, or with the executive committee or the board of directors of Corporation Concept Alpha de Rouyn-Noranda if the complaint concerns the general manager.

11.2

As provided by the law, a person who has been denied access to or correction of confidential information concerning him or her may file a complaint with the Commission d'accès à l'information for review of the disagreement within 30 days of Corporation Concept Alpha de Rouyn-Noranda's refusal to grant the request or the expiry of the deadline for responding.