



POLICY ON CONFIDENTIALITY AND PROTECTION OF PERSONAL INFORMATION

Accalmie Women's Shelter

Adopted on September 26th, 2023

HISTORY OF DOCUMENT CHANGES

Date of creation	September 2023
Version xx	Modification date

OBJECTIVE

The objective of the policy is to encourage responsible practices in the processing and management of personal data, in accordance with the *Personal Information Protection Act*.

More specifically, the confidential data protection policy aims to inform how Accalmie Women’s Shelter commits and undertakes the means necessary to preserve the confidentiality of all the personal information in which it collects. It also aims to inform on the process it has put in place to handle complaints relating to the protection of personal information and confidentiality incidents.

SCOPE OF APPLICATION

This policy applies to data deemed confidential and to personal information collected, used, stored, or communicated by Accalmie. It processes data concerning its donors, information linked to the activities of the organization, information concerning its clientele, members of its board of directors, members of its staff, individual members, and volunteers.

This policy applies to relationships between all persons: women, children, administrators, donors, staff members, volunteers, partners, and all people present in the various premises of Accalmie.

It also applies to third party relations such as service providers, who process confidential information on behalf of Accalmie.

MODALITY OF APPLICATION

The person responsible for the protection of personal information as well as the board of directors are responsible for the implementation and application of the confidentiality policy.

Administrators, management, employees, interns, and volunteers must complete a commitment form as soon as the policy comes into effect, to ensure compliance.

Violation of this policy will result in disciplinary measures deemed appropriate by Accalmie, including possible dismissal or exclusion.

The policy comes into effect on September 26, 2023 as published on its website.

ROLES AND RESPONSIBILITIES OF MEMBERS OF THE WORK TEAM

Each member of staff at Accalmie Women's Shelter must formally engage and commit in their Employment contract to respect the confidentiality of personal information collected by themselves or by any other person, as well as this policy.

The person responsible for the protection of personal information within the shelter is the person appointed in writing by the board of directors.

This person has the following responsibilities:

- Guarantee that the necessary means are taken to ensure the protection of personal information, from collection to destruction;
- Respond to requests for access, rectification, and communication to third parties;
- Receive files of complaints and confidentiality incidents, document them and ensure their processing.
- Maintain a record of confidentiality incidents.

COMMITMENT

Accalmie Women's Shelter commits to:

1. Protect personal information and confidential data obtained, within its responsibility
2. Inform the subject during the collection of personal information at the time it is collected
3. Collect only necessary and useful data
4. Obtain consent when collecting, using, or disclosing personal information when required
5. Keep personal information for no longer than necessary or for the fulfillment of the specified purposes
6. Protect personal information using appropriate measures
7. Inform individuals of the personal information held about them, upon request
8. Ensure rapid and confidential processing of complaints

1. Protect personal information and confidential data obtained, within its responsibility

Accalmie Women's Shelter is responsible for the personal information it possesses and controls. It will put in place appropriate measures to offer a comparable level of protection when said information is processed by a third party. Accalmie has also established policies and procedures aimed to protect personal information. There is a designated a person responsible for the protection of personal information to supervise the confidentiality issues encountered. Employees were trained concerning the confidentiality policy, and on their role in protecting personal information.

2. Inform the subject during the collection of personal information at the time it is collected

Whenever Accalmie collects personal information, the person concerned is informed verbally, in writing or by email of the reasons for such collection, and the intention regarding their own information and concerning others with whom the information might be shared.

Except when required or permitted by law, the shelter will not communicate, without your consent, information for purposes other than those for which it was collected. Personal information is only shared with those who need it to carry out their duties.

3. Collect only necessary and useful data

Accalmie Women's Shelter will limit the collection of personal information and will only ask for what is reasonably required for the operation of its activities and to offer its services. The personal information collected is only what is considered necessary for the purpose of the file, all of which are treated confidentially.

Information on the clientele served

Accalmie Women's Shelter collects, uses, stores and communicates information about its clients for the following purposes:

- Establish and maintain supportive relationships;
- Understand the needs and preferences;
- Offer support and accommodation services appropriate to their situation;
- Ensure their safety

Information on employees and candidates

Accalmie Women's Shelter collects personal information about employees with regards to their salaries, to comply with current legislation put in place, to offer them social benefits, to use performance management tools and improve or manage programs, to policies and relationships relating to employees, for reasons of emergency preparedness, and generally, in order to establish, manage or terminate the employment relationship.

Accalmie Women's Shelter also collects personal information about people who are looking for employment at the shelter for the purpose of selecting candidates and ensuring that qualified persons are hired for the appropriate positions.

When necessary, personal information collected by the organization may be transferred to insurance and benefits providers, board members, pension plan managers and any other companies involved in contractual activities for its accounts. Personal information will only be used for the purpose in which it was collected.

Information on interns, contract workers and volunteers

Accalmie Women's Shelter collects personal information on interns, contract workers and volunteers necessary for the management of the internship, the business contract or the collaboration with volunteers.

Information on donors

La Maison d'aide et d'hébergement l'Accalmie accorde énormément d'importance à la confiance des donateurs qui décident de l'appuyer. Par conséquent, elle fait de son mieux pour limiter la collecte et l'utilisation des renseignements personnels de ses donateurs et pour en protéger la confidentialité. Aucune information n'est divulguée sans l'obtention du consentement du donateur.

Accalmie Women's Shelter attaches great importance in their donor's trust. Therefore, it does its best to limit the collection and use of its donors' personal information to protect confidentiality. Information is not disclosed without obtaining the consent of the donor.

4. Obtain consent when collecting, using, or disclosing personal information when required

At the time of collection, consent is implicit for the collection, use and retention of personal information. The signing of a contract, the request for assistance or accommodation or a donation are implied consent as to the collection and use of the information necessary to create the file.

Personal information concerning a minor under the age of 14 will be collected from them with the consent of the holder of parental authority, except when this collection will clearly be for the benefit of this minor.

Accalmie Women's Shelter will request consent before disclosing a person's personal information to a third party, except for the exceptions provided by law. When an employee accepts a job offer or benefits package, this acceptance generally constitutes consent authorizing our organization to collect, use and disclose personal information for all identified reasons.

At any time, the person having given consent may withdraw it, by submitting a written request if consent was given in writing, otherwise a verbal request will be sufficient.

5. Keep personal information for no longer than necessary or for the fulfillment of the specified purposes

Accalmie Women's Shelter will only retain personal information for no longer than needed or required for its specific purposes, or as required or permitted by law.

6. Protect personal information using appropriate measures

Information can be stored on different outlets, in paper or digital files, and access to it is secure. In all cases, only responsible persons within the shelter and who have the authority to read the information are authorized to do so. The information must be necessary for the exercise of their functions.

Accalmie Women's Shelter will protect all personal information by using appropriate security measures, against the risks of loss, theft, access, disclosure, copying, use, modification, or unauthorized destruction, regardless of the storage format. The level of sensitivity of the information is considered to determine the level of protection required. Accalmie will carefully destroy personal information to prevent unauthorized access. In the event of a security breach, it will take all necessary means to limit any potential harm.

All employees who access personal information must respect the confidential and private nature of said information.

Accalmie will protect personal information that is transferred to third parties within the framework of contractual agreements which stipulate that the third party must respect the confidential nature of the personal information and comply with all legal requirements imposed by legislation.

When Accalmie does business with one or more technological service providers to retain personal information, it must obtain from them a commitment to ensure its protection and preserve its confidentiality. This commitment was provided for the contract binding it to its suppliers. Suppliers must also specify in their contract the means they take to ensure the protection of personal information and that it will only be used within the framework of the execution of the contract.

Accalmie also includes an arrangement in the contracts with its technological service providers provided that it be notified of any confidentiality incident involving personal information collected.

7. Inform individuals of the personal information held about them, upon request

On request, Accalmie will allow the persons concerned to review the personal information retained about them. Any request subject to personal information must be sent in writing to Accalmie. The

request must specify the information, the name and contact details (postal address, email, and telephone) of the person making the request and confirm their identity. The request may also relate to a rectification or destruction of information.

For persons with a disability, certain accessibility measures will be taken, upon request, to enable them to exercise their rights of access or rectification.

Accalmie Women's Shelter will respond diligently no later than 30 days from the date of receipt of the request.

Any request for communication of personal information presented by a third party must also be in writing. In most cases, Accalmie will obtain the written consent of the person concerned before communicating personal information to a third party. Accalmie may also communicate personal information without the consent of the person when it is obliged to do so by law. In these cases, it will ensure that it only communicates the personal information required under this law and the circumstances of the communication request.

In certain cases, Accalmie may find itself unable to provide access to all of the personal information kept about an employee, a woman or a child. For example, Accalmie will not provide access when it could reveal personal information about a third party, unless the requested information can be separated from the file, or if the third-party consents to the communication of its information. Other grounds for denying access may include, but are not limited to, situations where the communication could reasonably threaten the life, health or safety of another person, information protected by attorney-client privilege, communications that could reveal information collected during an investigation or in violation of an agreement or a violation of a law. When access to a person's information is refused, Accalmie will provide the reasons for such refusal.

It is also possible for a person to ask Accalmie to make changes to their personal information if this information is out of date, inaccurate or incomplete. Accalmie will promptly modify personal information that proves to be inaccurate or incomplete. Any unresolved differences in the accuracy of personal information will be noted in the individual's file.

8. Ensure rapid and confidential processing of complaints

Any person wishing to submit a complaint relating to this policy or more generally to the protection of personal information must do so in writing, indicating their name, contact details and the reason(s) for their complaint. This must be then transmitted to the person responsible for the protection of personal information designated by Accalmie.

Accalmie Women's Shelter commits to treat complaints confidentially and to respond diligently no later than 30 days from the date of receipt of the complaint, given that all the information necessary to properly process the request has been obtained.

The person responsible for the protection of personal information must also investigate when a confidentiality incident occurs and immediately notify the person(s) concerned and the Commission d'accès à l'information if applicable and if the incident presents a risk of serious harm. In addition, they are also responsible for identifying reasonable measures in order to reduce the risk of harm to those concerned and to prevent new incidents of the same nature from occurring.