

Global Personal Information Management Policy

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I. GOVERNANCE POLICY ON BEST PRACTICES FOR THE HOLDING OF PERSONAL INFORMATION (PI) BY THE VALCARTIER MILITARY FAMILY RESOURCE CENTER (VMFRC)

To ensure compliance by Valcartier Military Family Resource Centre employees with the Act to modernize legislative provisions as regards the protection of personal information, also known as Law 25, this Policy validates and adapts the Valcartier Military Family Resource Centre's practices in this area. Law 25 makes significant changes to the provisions of the *Act respecting the protection of personal information in the private sector (Act)*, to which non-profit organizations in Quebec were already subject.

Note: Remember that information concerning corporations, as well as the professional coordinates of individuals, do not represent personal information (PI) subject to the Act.

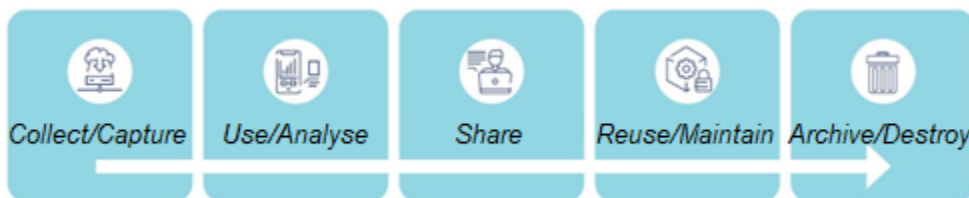
DEFINITION OF PERSONAL INFORMATION:

Personal information includes:

- name, race, ethnicity, religion, marital status, and level of education;
- E-mail address, electronic messages and IP address (Internet-cookie protocol);
- Age, height, weight, medical records, blood type, DNA, fingerprints, and voice signature;
- Income, purchases, consumer habits, banking information, credit or debit card data, loan or credit reports and tax returns;
- Social Insurance Number (SIN) or any other type of identification numbers.

Here are some of the elements considered and put into practice in order to promote compliance with the legislative provisions, most of which will come in effect in September 2023.

Life cycle of personal information:





1. **Collecting personal information and obtaining consent**

The Valcartier Military Family Resource Centre may collect personal information for the proper management of its relations and services with each individual concerned and limit the collection of information to what is required for this purpose. The consent of the person concerned is also necessary to be able to legally use the personal information it transmits to the Valcartier Military Family Resource Centre. The Valcartier Military Family Resource Centre has put in place a process to obtain the consent of each individual and document when and how that consent was obtained or renewed. The databases of the Valcartier Military Family Resource Centre track and document the consent obtained or renewed.

2. **Consultation and use of personal information**

The Valcartier Military Family Resource Centre ensures that the following parameters are respected:

- **Limit access to personal information:** to only those persons authorized to receive it within the company when such information is necessary for the performance of their duties.
- **Limit the use of personal information:** unless an exception is provided for by law, obtain the consent of the person concerned to use his or her information once the purpose of the file has been fulfilled.
- **Implement security measures** to ensure the protection of personal information that is collected, used, communicated, retained, or destroyed.

3. **Communication of information**

Personal information held by the Valcartier Military Family Resource Centre must be forwarded to the individual upon request. This information must be posted on the Valcartier Military Family Resource Centre website.

Moreover, section 27 of the Act provides for the right to portability of PI, effective as of September 22, 2024. At the request of the person concerned, the MFRC will be obliged to communicate, in a structured and commonly used technological format, computerized personal information collected from him or her. This communication may also be made to a person or organization authorized to collect the information, at the request of the person concerned.

In addition, the law provides that the Valcartier Military Family Resource Centre may transmit an individual's personal information at the request of a third party or government agency:

- To your attorney;
- To the Director of Criminal and Penal Prosecutions, if the information is required for prosecution of an offence under a law applicable in Quebec;
- To an agency responsible, under the law, for preventing, detecting, or repressing crime or offences, which requires the information in the exercise of its functions, if the information is required for the prosecution of an offence under a law applicable in Québec;
- To a person to whom it is necessary to communicate the information within the framework of a law applicable in Quebec or for the application of a collective agreement;
- To a public body within the meaning of the Act respecting access to documents held by public bodies and the protection of public and personal information which, through a representative, collects the information in the exercise of its powers or the implementation of a program under its management;
- To a person or organization with the power to compel disclosure who requires it in the performance of his or her duties;
- To a person to whom this communication must be made because of an emergency situation endangering the life, health or safety of the person concerned;

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- To third parties in order to prevent an act of violence, including suicide, and when there is reasonable cause to believe that a serious risk of death or serious injury threatens an identifiable person or group of persons, and that the nature of the threat inspires a sense of urgency;
- To an archive under certain conditions and/or after a certain period of time;
- To a person who may use this information for study, research or statistical purposes in accordance with section 21 or to a person who is authorized in accordance with section 21.1 of the LP;
- To a person who, by law, may collect debts for others and who requires it for this purpose in the performance of his or her duties;
- To a person if the information is required to collect a debt owed by the company;
- To any person or organization likely to reduce the risk following a confidentiality incident involving personal information, by communicating only the personal information required for this purpose;
- To a spouse or close relative in the case of a deceased person, if the information is likely to help that person in his or her grieving process, unless the deceased person has recorded in writing his or her refusal to grant this right of access;
- To the parent or guardian of a minor under 14 years of age, except where the collection is clearly against the benefit of the minor.

4. Retention of personal information

The Valcartier Military Family Resource Centre has established rules for the retention and destruction of personal information.

Material records:

TYPE PERSONAL INFORMATION	LOCATION OF PI	PEOPLE WITH ACCESS TO PI	JUSTIFICATION FOR ACCESS	SECURITY OF PERSONAL INFORMATION
Address, contact details, signature, and employee profile	Filing cabinet	Human Resources Department, Human Resources Advisor and Human Resources Assistant	For record-keeping and employee management purposes	Access managed by padlock key (confidential security level) for the above-mentioned employees. Confidentiality agreement signed by users
Address, contact details, signature, and employee profile	Server	Finance and Administration Department, Finance and Administration team employees	For record-keeping, financial management and employee payroll purposes	Password-managed access via VPNI account for the above-mentioned employees. Monitoring via a contracted IT service. Direct physical access to the server using a key from a locked door. Confidentiality agreement signed by users

Notes on follow-up meetings and interventions	USB key (confidential / protected B)	Psychosocial team employees (each to their own)	For customer follow-up and record-keeping purposes in accordance with their professional order	Password-managed access for the above-mentioned employees. Confidentiality agreement signed by users
Notes on follow-up meetings and interventions	Filing cabinet	Program management, coordinator, and psychosocial team staff	For customer follow-up and record-keeping purposes in accordance with their professional order	Access managed by padlock key (confidential security level) for the above-mentioned employees. Confidentiality agreement signed by users

Person authorizing physical access permissions or physical access permission settings: administrative and logistics officer (Diane Tremblay)

Substitute in the event of absence: Finance and Administration Manager (Isabelle Madé)

Computer folders:

The Valcartier Military Family Resource Centre holds PI on two computer networks: the civilian computer network and the Department of National Defence (DND) computer network. The latter enables sensitive and highly sensitive information to be encrypted, or sensitive and highly sensitive PI to be consulted for customer follow-up or personalized customer services.

TYPE PERSONAL INFORMATION	LOCATION OF PI	PEOPLE WITH ACCESS TO PI	JUSTIFICATION FOR ACCESS	SECURITY OF PERSONAL INFORMATION
Board members' contact details	On the Board's SharePoint	General Management, Executive Assistant and Board members	For correspondence and legal purposes (T-3010)	Password-controlled access restricted to the above-mentioned persons. Confidentiality agreement signed by users.
Customer addresses and contact details	On the Penelope database	General management, managers, and all employees	For statistical purposes	Access managed by password (criteria and change of password enforced by the system) and management of services rendered entered by service team. Confidentiality agreement signed by users
Customer addresses and contact details	On the Toucan database	Special Projects Department,	For statistical purposes and to	Password-controlled access for the

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		Special Projects Assistant, Coordinator and workers of Children department, Employment and Intervention workers	output the Relevé 24	above-mentioned persons. Confidentiality agreement signed by users
Customer addresses and contact information	DND - DWAN system with directories (e.g. Q and U) with granular access	All employees	For record-keeping and statistics purposes	Password-managed access and governance security so that employees have access only to what they need to do their job according to their job title Confidentiality agreement signed by users (and reading of DND security policies)
Addresses, contact details and client profile	Access software	Employability support officer	To provide statistics requested by funders and for archival purposes	Password-managed access. Confidentiality agreement signed by users
Addresses and contact details of clients	On the LGEstats database	Program management, coordinator and workers of Employment department, and Special Projects Assistant	For statistical purposes	Access managed by password, to the above-mentioned persons. Confidentiality agreement signed by users
Addresses, client contact information and description of problem situation	On the psychosocial intervention SharePoint	Program management, coordinator, and psychosocial team employees	For client follow-up purposes and to assign the employee to the file	Password-managed access and governance security for the above-mentioned employees. Confidentiality agreement signed by users
SIN's customers	On the Toucan database	Special Projects Department, Special Projects Assistant, Coordinator and workers of	For statistical data entry purposes and to output the Relevé 24	Password-protected access to the above-mentioned persons. Confidentiality agreement signed by users

		Children department,		
Notes on customer meetings and services	On the Penelope database	All employees	For record-keeping purposes in accordance with their professional order	Password-controlled access for the employee assigned to the department or team in which he or she works. Confidentiality agreement signed by users
Notes on follow-up meetings with customers	On the LGEstats database	Employees in the Employment Assistance sector	For record-keeping purposes in accordance with their professional order	Password-controlled access for the employee assigned to the department or team in which he or she works. Confidentiality agreement signed by users
Address, contact details, employee profile and financial information	ADP software	All staff (granular access as required)	For record-keeping, employee management and payroll purposes	Password-managed access and governance security to ensure that employees have access only to what they need to do their job according to their job title. Confidentiality agreement signed by users
Address, contact details, employee profile	Tandem software	Human Resources Department, Human Resources Advisor and Human Resources Assistant	For record-keeping and employee management purposes (archives)	Password-managed access for the above-mentioned employees. Confidentiality agreement signed by users
SIN's employees	ADP software	All our staff	For record-keeping, employee management and payroll purposes	Password-managed access and governance security to ensure that employees have access only to what they need to do their job according to their job title

				Confidentiality agreement signed by users
Employee financial information	Sage software	Finance and Administration Department, Finance and Administration team employees	For record-keeping, financial management and employee payroll purposes	Password-managed access via VPNI account for the above-mentioned employees. Confidentiality agreement signed by users
Employee financial information	Zoho software	Finance and Administration Department, Finance and Administration team employees	For record-keeping, financial management and employee payroll purposes	Password-managed access via VPNI account for the above-mentioned employees. Confidentiality agreement signed by users

It is important to validate the inventory of IT folders in which PIs may be found, redefine the IT folder tree if necessary, and limit access to IT folders in which PIs are found to only those people who need to access or consult this information as part of their duties.

When MS365 and SharePoint were implemented, a governance plan was drawn up: [Synthese plan de gouvernance et classification.docx\(French only\)](#) [Politique de gouvernance SharePoint.docx \(French only\)](#)

An IT risk audit was carried out in 2019 via the firm InnovSa. Details are listed in the matrix : [CFV Matrice de sécurité.xlsx \(French only\)](#)

Person authorizing computer access permissions or computer access permission settings: Administrative and Logistics Officer sends authorizations to computer supplier Référence Système, who makes changes to employee's MS365 accounts. Substitute in the event of absence: HR and Projects Assistant

Location of computer server(s):

Valcartier Military Family Resource Centre computer network manager: Administrative and logistics officer, Diane Tremblay, diane.tremblay@crfmv.com

The computer server is located on the premises of the Valcartier Military Family Resource Centre, which ensures that access to the premises in question is restricted to persons who require access to PI or to IT personnel responsible for server maintenance.

The law also requires the Valcartier Military Family Resource Centre to carry out a Privacy Impact Assessment (PIA), notably before disclosing personal information outside Quebec, such as when using databases or Microsoft 365 tools, since their servers are located outside Quebec, but in Canada.

5. Destruction of personal information

The Valcartier Military Family Resource Centre defines the rules governing the destruction of personal information held on an individual. Consent is also given for specific purposes and for the **duration necessary** to achieve the purposes for which it was requested.

Since the obligations of a charitable organization require that information related to the issuance of tax receipts to its donors be kept for a period of 6 years, it is necessary to preserve this personal information. Here is a reminder of the information that must be included on tax receipts issued by charities that contain personal information:

Official donation receipts issued for income tax purposes must contain the following elements:

- A statement that the donation is an official receipt for income tax purposes.
- The name and address of the charity registered with the Canada Revenue Agency (CRA);
- The charity's registration number;
- Receipt serial number;
- The place or region where the receipt was issued;
- The date or year the donation was received;
- The date the receipt was issued, if different from the date the donation was received;
- The name and address of the donor, including first name and initial;
- The amount of the donation;
- The value and description of any advantage received by the donor;
- The eligible amount of the donation;
- The signature of a person who has been authorized by the charity to acknowledge donations;
- The name and address of the CRA website.

The MFRC defines the necessary duration of consent obtained from its suppliers, employees and clientele according to the purpose for which the PI was obtained. The organization considers that it will retain PI obtained from the above-mentioned individuals for a maximum of 6 years following the date of termination of service, end of employment or last consent to the use of personal information, whichever is later. It should be remembered that this consent may be renewed by suppliers, employees and clients in the context of links and transactions carried out with the Valcartier Military Family Resource Centre, and that a mechanism must be defined to document the consents obtained. Individuals for whom the Valcartier Military Family Resource Centre holds PI may request at any time that their personal information be destroyed, de-indexed (s. 28.1 of the Act) or made anonymous (except for information previously required for a period of 6 years).

6. Confidentiality commitments of users with access to PI

Commitment to confidentiality by staff, contractors and volunteers with access to personal information

Any person who may have access to an individual's personal information held by the Valcartier Military Family Resource Centre signs a confidentiality agreement with the Valcartier Military Family Resource Centre.

The following undertaking is signed by employees of the Valcartier Military Family Resource Centre:

"I, (name of the person), am an employee of the Valcartier MFRC and as such, I undertake to:

1. Carry out my duties and responsibilities with integrity.
2. Respect the mission, vision and values of the Valcartier Military Family Resource Centre.
3. Serve the military community in a conscientious and diligent manner.
4. To respect the privacy of my clients and, subject to the Act respecting access to documents held by public bodies and the protection of personal information (R.R.Q., c. A-2.1), to maintain the confidentiality of any information brought to my attention in the performance of my duties by the MFRC's clients or by any other person concerning a client, the military community, the staff, the members of the Board of Directors and the volunteers of the MFRC. I will only disclose such information if required to do so by law or in the performance of my duties.
5. To cooperate with and show respect for my co-workers, volunteers, and the Centre's resource persons."



Confidentiality undertaking from a third-party contractor with access to personal information

The following commitment could be made by the Valcartier Military Family Resource Centre staff (see also the model agreement with a third party):

"Considering that the Valcartier Military Family Resource Centre has decided to entrust the mandate of [DESCRIPTION OF CONTRACTOR] to [NAME] and that the execution of this contract requires the transfer and/or access by [NAME], its personnel or any sub-contractor it mandates, to personal information held by the Valcartier Military Family Resource Centre.

Given that [NAME] undertakes to take all measures required to ensure the protection and confidentiality of personal information held by the Valcartier Military Family Resource Centre.

It is agreed that the preamble forms an integral part of this agreement.

It is agreed that for the duration of my contract with the VALCARTIER MILITARY FAMILY RESOURCE CENTRE and following the end of my involvement with the VALCARTIER MILITARY FAMILY RESOURCE CENTRE, I undertake and agree not to disclose or divulge to anyone, directly or indirectly, any personal information of an individual held by the VALCARTIER MILITARY FAMILY RESOURCE CENTRE to which I may have access. Personal information includes, without limiting the generality of the foregoing:

- name, race, ethnicity, religion, marital status, and level of education;
- e-mail address, electronic messages and IP address (Internet-cookie protocol);
- age, height, weight, medical records, blood type, DNA, fingerprints, and voice signature;
- income, purchases, consumer habits, banking information, credit or debit card data, loan or credit reports and tax returns;
- Social Insurance Number (SIN) or any other type of identification numbers.

I also agree not to use any personal information for personal purposes or purposes other than the involvement required of me by the VALCARTIER MILITARY FAMILY RESOURCE CENTRE.

Notwithstanding any other provision of this undertaking, I will not be in default or breach of any obligation because of any disclosure of personal information, if I am required by law to disclose such information provided that I have made best efforts to notify the VALCARTIER MILITARY FAMILY RESOURCE CENTRE promptly so that the VALCARTIER MILITARY FAMILY RESOURCE CENTRE may take appropriate steps to prevent such disclosure if necessary.

I further undertake that all members of my staff involved in this contract will adhere to this undertaking. This undertaking is binding on any corporation and any person associated with [NAME] having access to personal information transmitted by the Valcartier Military Family Resource Centre.

At the end of the contract, I agree that all personal information transmitted by the Valcartier Military Family Resource Centre and processed by me and my staff will be returned to the Valcartier Military Family Resource Centre and destroyed without backup. "

II. Privacy Policy

As an organization operating in the health and social services sector, we collect, use, and disclose information on a daily basis for the purpose of providing our services in terms of soliciting contributions in various forms, participating in events, and providing information about our privacy is important to us. We adhere to the highest ethical standards when handling all information, especially personal information (PI).

This Privacy Policy is intended to help you understand our practices regarding the collection, use, disclosure and retention of personal information. By providing us with personal information (through our website, by completing an activity participation form, by registering as a volunteer for the Valcartier Military Family Resource Centre or any other computerized tool, whether by e-mail, in person or by telephone), you agree to its processing in accordance with this Privacy Policy, and you authorize the Valcartier Military Family Resource Centre, its third parties and service providers to process your personal information for the purposes set out below (see 4).

This Privacy Policy does not apply to third-party websites that may be accessed through links on this website, and the Valcartier Military Family Resource Centre is not responsible for such third-party websites. If you follow a link to a third-party Web site, that Web site will have its own privacy policies that you should review before submitting any personal information.

WHO WE ARE AND WHAT WE DO

VALCARTIER MILITARY FAMILY RESOURCE CENTRE (Valcartier MFRC) is a non-profit legal person, legally incorporated under the Companies Act, Part 3 (RLRQ, c. C-38), having its head office at Édifice 93, C.P. 1000, succursales Forces, Courcellette, Québec, G0A 4Z0.

It is governed by a Board of Directors. The MFRC assists the military and veteran community by offering a variety of psychosocial intervention and support services, employability and career development support, childcare services (support and drop-in daycare), youth services (counsellors for youth aged 6 to 17), volunteer work and support during absences or postings.

WHAT PERSONAL INFORMATION DO WE COLLECT?

We may collect and process various types of personal information during our business and provision of services, including:

- Professional and/or personal contact information, such as first name, last name, address(es), e-mail address(es), date of birth and telephone number(s);
- Biographical information such as job title, employer, professional and/or personal background, photos and video or audio content;
- Marketing information and communication preferences, as well as related information such as dietary preferences, comments, and survey responses;
- Information related to contribution history, participation in Valcartier Military Family Resource Centre events, billing, and financial information, such as a billing address, bank account information or payment data;
- Service-related information, such as details of services rendered to you;
- Information about your professional background, networks, social involvement, professional affiliations, and family ties;
- Recruitment information, such as curriculum vitae, education and employment history, details of professional affiliations and other information relevant to potential recruitment by the Valcartier Military Family Resource Centre;
- Website usage and other technical information, such as details about visits to our websites, your interaction with our advertising and online content, or information collected through cookies and other tracking technologies;

- Information provided to us by or on behalf of our customers or generated by us in the course of providing our services, which may, where relevant, include special categories of personal information (such as racial or ethnicity, political opinions, religious or philosophical beliefs, trade union membership or sexual orientation etc.);
- Information such as your donation and community investment policy, your contributions, the recipient organizations and what they are dedicated to if applicable, the recognition obtained, the decision-making process and the people involved in the Valcartier Military Family Resource Centre and this process;
- Any other personal information provided. Please note that if you provide us with personal information about other persons (such as your clients, directors, officers, shareholders, or beneficial owners), you must ensure that you have duly notified them that you are providing us with their information and that you have obtained their consent to such disclosure of information;
- Where applicable, evidence of consent given to us (date, time, means), in circumstances where such consent is necessary for the processing of personal information.

We do not knowingly collect information from children or others under the age of 14. If you are a minor under the age of 14, please do not provide us with any personal information without the express consent of a parent or guardian. If you are a parent or guardian and you are aware that your children have provided us with personal information, please contact us. If we learn that we have collected personal information from minor children without verification of parental consent, we will take steps to delete that information from our servers.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect personal information from you and during our interactions with you, as follows:

- When you register for events, training, and newsletters;
- When you donate to our organization, regardless of the form of your donation;
- When you register as a volunteer for our organization;
- While providing services to you.

We also collect publicly available information on public platforms, including our website.

HOW DO WE USE PERSONAL INFORMATION?

We may use personal information in any of the ways listed below, with your consent or, where applicable, under another legal basis. In each case, we indicate the purposes for which we use your personal information:

- To provide our services as well as for the conduct of our business, to administer and perform our services, including to perform our obligations arising from any agreement entered into between you and us;
- To facilitate the use of our websites and to ensure that the content is relevant and to ensure that the content of our websites is presented in the most effective manner for you and your device;
- For marketing and business development purposes - to provide details of new services, information on developments at our Valcartier Military Family Resource Centre and in our sector, and invitations to seminars and events where an individual has opted to receive such information;
- For research and development purposes (including security) - to conduct analyses to better understand our customers' service and marketing requirements and to better understand our organization and develop our services and offerings;
- For recruitment purposes - to enable us to process job applications and assess whether an individual meets the requirements of the position for which he or she may apply at the Valcartier Military Family Resource Centre;
- To meet our legal, regulatory or risk management obligations;
- To prevent fraud and/or conduct other background checks that may be required at any time by applicable law, regulation and/or best practices (if false or inaccurate information is provided or fraud is detected or suspected, information may be forwarded to fraud prevention organizations and may be recorded by us or such

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organizations). When processing special categories of personal information, we may also rely on important public interests (crime prevention or detection) or legally founded claims;

- To enforce our rights, to meet our legal or regulatory reporting obligations or to protect the rights of third parties;
- To ensure we get paid - to collect payments owed to us and, where appropriate, to enforce such collections by debt collection agencies or other legal means (including legal proceedings);
- To reorganize or modify our organization - if we undertake a reorganization (for example, by merging, consolidating or divesting part of our organization's mission), we may need to transfer some or all personal information to an applicable third party (or its advisors) as part of any due diligence process or transfer to such, the reorganized entity or third party for the same purposes as set out in this Privacy Policy or for analyzing any reorganization or modification of our organization, the proposed Valcartier Military Family Resource Centre. In such a situation, we will take all possible steps to ensure the protection and security of personal information.

WITH WHOM DO WE SHARE PERSONAL INFORMATION?

The Valcartier Military Family Resource Centre is a not-for-profit legal person, legally incorporated under the Companies Act, Part 3 (RLRQ, c. C-38), therefore, the personal information we collect may be transferred to and processed by any entity within the Valcartier Military Family Resource Centre network. We may also share personal information with certain third parties, including the following:

- Volunteers of the Valcartier Military Family Resource Centre, supervised by staff member so they can provide services to clientele;
- Third-party service providers and/or partners, including those who provide us with IT, database analysis, Web site, application development, hosting, maintenance, and other services. These third parties may access or process personal information in connection with the services they provide to us. We limit the information we provide to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with these service providers require them to maintain the confidentiality of such information.
- Government authorities and law enforcement agencies, where required by applicable law. For greater certainty, we may disclose personal and other information if we are required to do so by tax or other laws, or if we believe in good faith that such disclosure is necessary to comply with applicable laws, in response to a court order or government subpoena or search warrant, or otherwise to cooperate with such government authorities and law enforcement agencies.
- The purchaser, successor or assignee in connection with any merger, acquisition, debt financing, asset sale or similar transaction, as well as in the event of insolvency, bankruptcy or receivership involving the transfer of personal information as a business asset to one or more third parties;
We will only use personal information for the primary purpose and the applicable legitimate purpose for which it was collected, or for purposes consistent with that primary purpose.

The organization uses the services of third-party sites, such as Google and Facebook, to promote its content and offers.

When you visit our website, these third parties may use cookies, web beacons or similar technologies on your hard drive to collect or receive information about your browsing on the website and elsewhere on the Internet. These technologies enable us to deliver relevant advertising targeted to your interests. You can consult cookies and delete them if you wish. You therefore have full control. We advise you to refer to your browser settings to make the appropriate changes.

If you would like third-party sites to store cookies on your hard drive to offer you targeted advertising, you can activate this option.

For further information, please consult our *Cookies Policy (cookies – voir p. 16)*.

HOW LONG DO WE KEEP PERSONAL INFORMATION?

For the purposes set out in this Privacy Policy, we will keep your personal information for as long as necessary to comply with our legal and regulatory obligations.

If you would like to know more about our data retention policy, please contact us using the details in the “How to contact us” section.

WHERE DO WE STORE PERSONAL INFORMATION AND TRANSFERS OUTSIDE QUEBEC?

We store The Valcartier Military Family Resource Centre's personal information on our computer servers and may transfer it outside of Quebec as required.

HOW DO WE PROTECT PERSONAL INFORMATION?

We are in compliance with industry standards for the protection of all information transmitted to us, both during transmission and at the time of receipt.

Our measures include appropriate physical, technical and administrative safeguards to protect personal information from against accidental or illegal destruction, loss, alteration, unauthorized access or disclosure, misuse, or other forms of compromise. Therefore, we cannot guarantee the absolute security of your personal information.

We have implemented measures to restrict access to your personal information to those employees who need to know or whose job requires them to know such information. We are committed to safeguarding your personal information and preventing any unauthorized processing. We have implemented measures to restrict access to your personal information, limiting to employees who have a legitimate need to or whose job duties require access. However, it is essential to note that no method of transmitting or storing data is completely secure. We cannot ensure or warrant the security of any information you transmit or provide to us, and you do so at your own risk.

Additionally, we cannot ensure that such information will not be accessed, obtained, disclosed, modified, or destroyed due to a breach of our physical, technical, or administrative safeguards. If you believe that your personal information has been compromised, please refer to the “How to contact us” section for further assistance. If a privacy incident occurs that involves information, we will notify you as soon, as we become aware of it.

Take reasonable steps to minimize the risk of harm and prevent similar incidents from occurring in the future.

WHAT ARE THE RIGHTS OF AN INDIVIDUAL WITH RESPECT TO PERSONAL INFORMATION?

Under applicable data protection laws, individuals are entitled to certain rights regarding their personal information, including right to inquire if we process their information and, if so, to request access to it.

Individuals may obtain their requested information, unless prohibited by law and, where permitted, upon payment of a fee. A copy of the personal information we have and other relevant details about the individual.

Accuracy is a requirement, so we take reasonable steps to ensure that the personal information we hold is accurate, complete, not misleading and up to date.



Rectification is also an option, giving the right to request changes to any incomplete or inaccurate personal information in our possession. In addition, there is a right to request de-indexing, which stops the dissemination of personal information, or de-indexing of any hyperlink.

In accordance with the right to erasure or forgetting, we provide individuals with the opportunity to request the removal of their personal information if dissemination puts them at risk of violating the law or court orders.

In addition, our organization adheres to the practice of anonymizing personal information when there are serious and legitimate purposes for doing so, such as retaining information necessary for potential tax inspections, instead of destruction.

You are entitled to be informed if automated processing is the sole basis for processing. You have the right to be informed when technology is used to identify, locate and profile you, location or profiling you.

You may also file a complaint with a data protection authority in your country.

If the text already complies with the Principles or lacks context, simply reply with "province or country in which you normally reside (in Quebec, the Commission d'accès à l'information), where we are located, or where an alleged breach of privacy law has occurred.

To exercise any of these rights, please contact us as indicated in the "How to contact us" section.

HOW DO WE USE COOKIES AND SIMILAR TECHNOLOGIES?

For detailed information about the cookies we use, please refer to our Cookie Policy below, which forms part of this Privacy Policy (see page 16).

HOW TO CONTACT US

If you have any questions, comments or complaints about this Privacy Policy or your personal information, or if you would like to exercise your rights, file a complaint or obtain information about our policies and practices regarding our service providers outside Canada, please contact our Privacy Officer by e-mail at lisa.kennedy@crfmv.com, by telephone at 418-844-6060 or by mail at the following coordinates:

Valcartier Military Family Resource Centre
Attn : Lisa Kennedy
Privacy Officer
Édifice 93, Succursale Forces, C.P. 1000
Courcelette, Québec
G0A 1Z0

HOW DO WE UPDATE THIS PRIVACY POLICY?

We may change the content of our websites and our use of cookies without notice. Consequently, our Privacy Policy and Cookie Policy may be modified periodically. Therefore, we recommend that you review them whenever you visit our site to stay informed about how we treat personal information.

This policy was last updated on September 12, 2023.

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iii. Cookies Policy

Consent

By using our website <https://crfmv.com>, you agree to use cookies in accordance with our Cookie Policy. You will be prompted to do so during your first visit to our site. Although it may not appear on subsequent visits, you may revoke your consent at any time by following the instructions below.

Disable indicators

Where the Valcartier Military Family Resource Centre sets cookies with automated disabling tools, we provide the name of the organization, the category of cookies that are being set, and a link to the disabling tool.

For all other cookies, we indicate their name and source.

Please refer to the date of this cookie policy to identify and disable cookies using your browser controls.

If you have any objections to the use of cookies, you can disable them by following the instructions in [Tout sur les cookies informatique | All About Cookies](#) or by using an automatic disabling tool, if available. Nonetheless, some services may not operate as effectively if cookies are disabled.

We reserve the right to change the way we use cookies after you visit us for the first time. Our cookie policy will always specify we sets the cookies, what purpose of the cookies, and how to disable them, so please check back periodically.

Below is a description of the types of cookies we use.

What categories of cookies does the Valcartier Military Family Resource Centre and its suppliers use?

Strictly necessary cookies

These cookies are essential for navigation and access to the features of this web site. Without them, you would not be able to access services such as page navigation.

Performance cookies

They are utilized to analyse and track website performance by our team. This will enable us to identify how our visitors use our websites. We use cookies to ensure a high-quality experience by personalizing our services and promptly identifying and correcting any issues. For instance, we may use performance cookies to track the most popular pages, determine the most effective linking methods, and identify the cause of any error messages on certain pages. We may utilize these cookies for these purposes. We use cookies to personalize the site content and provide targeted items or services based on your website usage. We or our vendor do not correlate the data gathered by these cookies with your personal information.

Web site functionality cookies

We use cookies to provide you with certain functionality. For example, to remember the choices you make (such as your username, language or region) or to recognize the platform from which you access the site and to provide you with enhanced and more personal functionality. These cookies are not used to track your browsing on other sites.

Targeting cookies

Targeting cookies (or advertising cookies) collect information about your browsing habits and are used to better target advertising to you and your interests. They are used by services provided by third parties, such as the Like or Share buttons. The AddThis cookies mentioned above are also examples of targeting cookies. Third parties provide these services in exchange for acknowledging that you have visited our website.



When you use LinkedIn, Twitter or other available sharing buttons, you are directed to a page controlled by those companies, which may place cookies (including targeting cookies), and you will be subject to the cookie policies of LinkedIn, Twitter or other relevant website, respectively.

Use of IP addresses and Web logs

We may also use your IP address and browser type to help diagnose problems with our server, to administer our Web site and to improve our service to you. An IP address is a numeric code that identifies your computer on the Internet. Your IP address may also be used to gather broad demographic information.

We may perform IP address lookups to determine the domain you came from (e.g. google.com) in order to get a better picture of our users' demographics.

Information from these types of cookies and technologies is not combined with information about you from any other source and will not be used to determine your identity.

Invisible pixels in HTML e-mails and webinars

Our marketing e-mails contain a unique campaign-specific "web beacon" that notifies us if our e-mails are opened and, combined with other technology, verifies clicks on links within the e-mail. We may use this information for a variety of purposes, including to determine which of our e-mails are of most interest to you, and to ask users who do not open our e-mails if they wish to continue receiving them. The pixel will be removed when you delete the e-mail. If you do not want the pixel to be downloaded to your device, you should choose not to click on the links we send you. This information may be linked to your personal identity.

Cookie policy does not cover third-party websites

Please note that this Cookie Policy does not apply to, and we are not responsible for, the privacy practices of third party websites that may be linked to or from this website.

Changes to the cookies policy

We may update this Cookie Policy from time to time, and we encourage you to review the Policy from time to time to stay informed about how we use cookies. This Cookie Policy was last updated on July 18, 2023.

IV. Complaints Policy

1. Purpose

As the military community is at the heart of the Valcartier Military Family Resource Centre's (MFRC) concerns, the purpose of this policy is to maintain and develop a quality of service of excellence in keeping with the MFRC's mission and the organization's capabilities.

This policy is intended to be a uniform approach for the clientele we serve, in order to collect and process complaints. It is part of a process of continuous improvement of service quality, while aiming to make customers and services more accountable.

2. Objectives

The objectives of the policy are to:

- Provide customers with a simple, accessible mechanism for filing and handling complaints;
- Have an overview of the situation and, if necessary, take appropriate corrective action;
- Aim to resolve the situation while promoting customer satisfaction;
- Ensure fair treatment of complaints received, while respecting human rights and organizational values.

3. Values

The values that guide the handling of complaints are the MFRC's organizational values:

- Respect;
- Transparency;
- Excellence;
- Leadership;
- Fairness.

4. Definition

A complaint is defined as any official expression in writing, verbally, in person or by e-mail of dissatisfaction with a service received or prejudice suffered as a result of an event, situation, act or omission with respect to the service provided by the Valcartier Military Family Resource Centre.

The following are not considered complaints:

- Abusive language;
- Dissatisfaction with an employee's response to a service; response based on GMFRC procedures;
- Complaints submitted anonymously.

5. Guiding principles

The guiding principles of this policy are:

- That everyone who files a complaint feels heard and respected;
- Avoid any judgment on the part of staff towards the person lodging a complaint;
- To ensure an efficient and timely process by keeping the complainant informed of how the complaint is being handled;
- A complaint is seen as an opportunity to improve the services of the Valcartier Military Family Resource Centre;
- Ensure that our customers and staff are aware of the existence of and procedures for filing and handling complaints.



6. Confidentiality

All complaints received will be treated confidentially. Complaints will be forwarded, with the complainant's written or verbal authorization, only to those persons who need to know in order to take corrective action.

7. Report/management

A summary report is presented on a regular basis to the Board of Directors and in the Executive Director's annual management report.

A general report is also presented in the Valcartier Military Family Resource Centre's annual report.

8. Retention of complaints

Only those designated to receive and process complaints have access to the files. Files are kept under lock and key.

The Board of Directors, when convened, has access to the files, if necessary.

Files are kept for 5 years.

APPENDIX- Procedures for filing and handling complaints

1. Filing a complaint

A person may file a complaint in writing to the following address:

Valcartier Military Family Resource Centre
Attn: Program manager
Édifice 93, Succursale Forces, C.P. 1000
Courcellette, Québec
G0A 1Z0

2. Registration

The following information is required to register a complaint:

- Surname, first name, address, and telephone number of complainant;
- Subject of complaint;
- Complainant's expectations;
- Signature of complainant; and
- Date.

3. Complaint handling

All complaints will be handled by the person designated by the General Manager, i.e. the GMFRC Program Manager.

If the complaint concerns the Program Manager, it will be forwarded to the General Manager. If the latter is the subject of the complaint, it will be forwarded to the Board of Directors for processing.

4. Responsibilities of the person designated to handle complaints.

The manager's main duties are to:

- Ensure that all conditions are met in order to consider the complaint;
- Inform the complainant of the complaint handling process;
- If necessary, open a complaint file;
- Conduct an investigation in accordance with the Military Family Services Program Privacy Code;
- Notify the complainant within 72 business hours that the complaint has been received;
- Provide feedback to the complainant, within 30 days;
- Report:
 - To the Board of Directors;
 - In the Valcartier Military Family Resource Centre annual report; and
 - In the Executive Director's annual management report.
- Keep files under lock and key.