

# Policies and Practices Governing Personal Information

(Document to be published on the organization's website)

A. Constituent elements of the governance program		
<b>Organizational commitment</b>	<b>a) Management participation</b>	<p>Management supports the personal information (PI) governance program and promotes a privacy-respecting culture by doing the following:</p> <ul style="list-style-type: none"> <li>• Appoint the person responsible for the protection of public relations (PRP Officer);</li> <li>• Approve the program control measures;</li> <li>• Monitor the program and report to the board of directors, as appropriate;</li> <li>• Provide the necessary resources to ensure the success of the program.</li> </ul>
	<b>b) Responsible PRP</b>	Responsible for developing and implementing program control measures and for their continuous evaluation and review.
	<b>c) Committee on the Protection of Personal Rights</b>	<ul style="list-style-type: none"> <li>• Strengthens the ability of the PRP Manager to monitor compliance and create a culture of respect for privacy within the organization.</li> <li>• Ensures that the protection of personal information is integrated into all core functions in which personal information is used.</li> </ul>
	<b>d) Accountability</b>	The organization establishes accountability mechanisms and takes them into account in the control measures of its program.
<b>Governance program control measures</b>	<b>a) Inventory of RP</b>	<p>The organization is able to determine:</p> <ul style="list-style-type: none"> <li>• The RPs that it owns or controls;</li> <li>• The need to collect, use and communicate PR;</li> <li>• The sensitive nature of public relations;</li> <li>• The consents obtained for the use and communication of PR;</li> <li>• Security measures in place.</li> </ul>
	<b>b) Policies, guidelines and procedures</b>	The organization has adopted policies, guidelines and procedures to govern the handling of personal information by its employees:

		<ul style="list-style-type: none"> <li>● A privacy policy that details the roles and responsibilities of employees throughout the lifecycle of this information;</li> <li>● Directive on the collection, use and disclosure of PR;</li> <li>● Directive on the retention, destruction and anonymization of PR;</li> <li>● Directive on security measures for public relations;</li> <li>● Procedure for handling requests and complaints relating to PR;</li> <li>● Procedure for managing confidentiality incidents involving a PR;</li> <li>● Privacy policy for PR data collected via the website.</li> </ul>
	<p><b>c) Risk assessment tools</b></p>	<p>The organization has equipped itself with tools to assess the risks incurred by the people concerned in certain situations:</p> <p>Privacy Impact Assessment (PIA) GridFor :</p> <ul style="list-style-type: none"> <li>● Any project involving the acquisition, development or redesign of an information system or the electronic provision of services involving the collection, use, communication, storage or destruction of personal data;</li> <li>● Communicating personal information outside Quebec or entrusting a third party located outside Quebec with the task of collecting, using, communicating or storing personal information on its behalf;</li> <li>● Communicating personal data to a third party without the consent of the individuals concerned for the purposes of study, research or statistical production.</li> </ul> <p>Risk assessment grid for serious harm in the event of a confidentiality incident.</p>
	<p><b>d) Training and awareness</b></p>	<p>The organization has implemented a training and awareness program aimed at all employees, including managers, which covers the following topics: :</p> <ul style="list-style-type: none"> <li>● The laws, policies, guidelines, and internal procedures applicable to the protection of personal data;</li> <li>● Techniques to identify and recognize confidentiality incidents;</li> <li>● The handling of complaints and requests relating to the protection of personal rights;</li> <li>● The consequences of violating laws and internal rules regarding the protection of personal data.</li> </ul>

	<p><b>e) Protocol for managing a confidentiality incident</b></p>	<p>The organization has implemented a procedure and appointed a person responsible for managing confidentiality incidents involving public relations. The procedure clearly defines responsibilities for internal and external reporting of breaches.</p> <p>The organization keeps a record of all confidentiality incidents, even those that do not pose a risk of serious harm.</p>
	<p><b>f) Service provider management</b></p>	<p>The organization enters into a written contract with the service providers to whom it discloses personal information without the consent of the individual concerned. This contract notably includes:</p> <ul style="list-style-type: none"> <li>● Measures to protect public relations;</li> <li>● The use of PR for the purposes of contract execution;</li> <li>● The destruction of the RP at the end of the contract;</li> <li>● The obligation for the service provider to notify the organization without delay in the event of a breach or attempted breach of confidentiality obligations;</li> <li>● The possibility for the organization to request any document and to carry out any verification relating to the confidentiality of PR.</li> </ul>
	<p><b>g) External communication on the website</b></p>	<p>The organization informs individuals of their rights regarding the protection of personal information and the control measures of its program by publishing information in simple and clear terms on its website:</p> <ul style="list-style-type: none"> <li>● Detailed information about the policies and practices that govern PR governance;</li> <li>● A privacy policy regarding personal data collected by technological means (if applicable);</li> <li>● The title and contact details of the PRP manager to whom questions or concerns should be addressed.</li> </ul>
<p><b>B. Ongoing evaluation and review of the governance program</b></p>		
<p><b>Monitoring and review plan</b></p>	<p>The organization has developed an annual monitoring and review plan that sets out how it monitors and evaluates the effectiveness of the control measures of its PR governance program.</p>	

**Evaluate and revise the governance program's control measures as needed.**

The organization reviews the program's control measures as needed:

1. Updates the RP inventory;
2. Reviews policies, guidelines and procedures;
3. Treats risk assessment tools as evolving documents;
4. Modifies training and awareness courses;
5. Adapts the management protocol in case of a confidentiality incident;
6. Refines the management of service providers;
7. Improves external communications.