

Privacy Policy

(The "Policy")

Last update: 2023-04-21

The purpose of this Policy is to define the measures and practices that the **Military Family Resource Centre** ("MFRC" or "we" or "us") has implemented to provide a framework for governing the use and disclosure of personal data or information collected during the course of its business, namely the personal information described in Section 2 below. By transmitting such personal information to the MFRC, a natural person (the "**Data subject**" or "**you**" or "**your**") expressly consents to the MFRC collecting, using, disclosing, and retaining such personal information in accordance with the terms and conditions provided in this Policy.

The purpose of this Policy is to provide information relating to:

- The means used by the MFRC to collect personal information.
- The nature of the personal information that is collected by the MFRC and the purposes for which it is collected.
- In what way the MFRC may use personal information and to whom the MFRC may disclose this personal information.
- The rights enjoyed by the Data Subjects with respect to personal information collected by the MFRC, including the right to access such personal information or to require the rectification of inaccurate personal information, where applicable.
- The various security measures implemented by the MFRC to protect the confidentiality of personal information.
- The way by which personal information is retained, destroyed and/or anonymized.
- The way in which a Data Subject concerned by personal data or information collected by the MFRC can communicate with it to address their questions, share their comments or, if applicable, file a complaint in connection with this Policy.

In this Policy, "personal data or information" refers to any information collected by the MFRC that, alone or in conjunction with other information, directly or indirectly identifies a natural person, excluding professional contact details. "Professional contact details" include the first name, last name, title, telephone number and email address of a natural person, when these are used and/or communicated by the latter in the context of their employment or of operating a business.

The MFRC reserves the right to modify the terms and conditions provided for in this Policy at any time and at its sole discretion. In such a case, the MFRC will communicate to you, at the coordinates that you have provided, a version of this Policy with the modifications made. By failing to notify the MFRC (using the contact details provided in Section 11 below) within thirty (30) days of the date you receive this version to object to such modifications, you will then be deemed to have expressly accepted.

This Policy and any amended version of it are subject to the legislation applicable in the

Province of Quebec, in particular the *Act Respecting the Protection of Personal Information in the Private Sector* (RLRQ, c. P-39.1).

1. By which means does the MFRC collect your personal information?

The MFRC collects personal information when a Data Subject voluntarily provides such personal information to an authorized representative of the MFRC. This voluntary transmission of personal information by a Data Subject may be made through (i) an in-person contact with an authorized representative of the MFRC or (ii) a contact by technological means (telephone calls, emails), and communications through third-party platforms (Facebook and Instagram) with the MFRC.

The MFRC may also collect personal information about Data Subjects who are members of the Canadian Armed Forces and their family members from a Canadian Forces base during the posting, deployment, or temporary absence of members of the Canadian Armed Forces in such situations. The personal information so collected by the MFRC is limited to the personal information required to establish contact with the member of the Canadian Armed Forces concerned and the members of their family.

The MFRC does not collect any personal information through the website accessible through the following hyperlink: [https://sbmfc.ca/bagotville/centre-de-ressources-pour-les-familles-de-militaires-\(crfm\)-de-bagotville](https://sbmfc.ca/bagotville/centre-de-ressources-pour-les-familles-de-militaires-(crfm)-de-bagotville) (the "**Website**"). Indeed, the Website is administered by Canadian Forces Morale and Welfare Services ("**CFMWS**"), the organization responsible for the administration and delivery of programs relating to "non-public property" (such as defined in Section 2 of the *National Defence Act* [R.S.C. 1985, c.N-5]) on behalf of the Chief of the Defence Staff. For more information regarding the terms of use and privacy policy applicable to the website, please consult the web page accessible through the following hyperlink: <https://cfmws.ca/legal-disclaimer>.

2. What personal data/information does the MFRC collect?

The personal data or/that the MFRC may collect is as follows:

- Your last name, first name and contact information (civic addresses, e-mail addresses, telephone numbers),
- Your date of birth, gender, languages spoken, preferred language, marital status, and number of children,
- Personal information concerning your status as a member of the Canadian Armed Forces (service number, unit name, job title and rank),
- Personal data that you communicate to us in the context of the performance of the Services (as defined in Section 3 below) and which is likely to constitute sensitive personal information (racial or ethnic origin, political opinions, religious or philosophical beliefs, level of education, [physical and mental] health, sexual orientation, and criminal record),

- Personal information that you provide to us for Respite Daycare services and which may be sensitive personal information (parents' or guardian's names, civic addresses, telephone numbers, number of children, children's names and ages, children's health information, social insurance numbers of those paying childcare for the production of tax slips, and financial information for the payment of childcare costs by bank direct debit [financial institution legal name, account number, transit number, debit card number and check digits]).
- Your correspondence and your communication history with us (communications by e-mail or through third-party platforms [Facebook and Instagram]).
- Personal information generated by you as part of your relationship with the MFRC (proof of consent, opinions, comments, and responses to surveys).
- Personal information provided as part of your application as an administrator and/or officer for the MFRC or your application for employment or volunteering addressed to the MFRC (curriculum vitae, information on education, professional experience and professional affiliations and identity documents to allow the MFRC to carry out a criminal background check).
- Personal information that you are required to provide to the MFRC due to the nature of your relationship with it (social insurance number and financial information for employees, identification documents for each of the directors of the MFRC, pursuant to the *Law aimed primarily at improving corporate transparency*).

Please note that you are responsible for obtaining the consent of an individual before disclosing to the MFRC any personal information concerning that natural person, including your family members. In a similar way, the MFRC does not collect any personal information concerning minor natural persons under fourteen (14) years of age, unless (i) having obtained the consent of the holder of parental authority or guardian, as the case may be or (ii) that the collection is evidently for the benefit of the minor natural person concerned.

3. For what purposes does the MFRC collect your personal information?

The MFRC collects your personal information for the following purposes:

- To provide you with information, tools, referrals, and professional assistance to enhance your well-being and that of your family members, including easier access for you and your family to resources relevant to your needs in the event of posting, deployment, or temporary absence (collectively: the "**Services**").
- To communicate with you in order to send you various information and answer your questions in connection with the MFRC and the Services.
- To schedule appointments and follow up periodically with you to obtain your feedback on the provision of the Services.
- To develop, improve and promote the Services, including creating, publishing, and communicating (anonymized) statistical data based on the personal information of

multiple Data Subjects.

- To review and process your application for membership as a member of the MFRC, as an administrator of the MFRC or for employment or volunteering addressed to the MFRC, and
- Perform our obligations and/or exercise our rights as your employer, as the non-profit organization of which you are a member, volunteer and/or administrator or in any other capacity.

Subject to exceptions provided for in applicable legislation, the MFRC will obtain your consent before proceeding with any use of your personal information for purposes other than those listed above.

4. To whom may the MFRC disclose your personal information?

The MFRC may disclose personal information about you to the following categories of persons or entities:

- a. To its representatives (directors, officers, employees, and volunteers) who need to have access to this personal information in the pursuit of one or more purposes listed in Section 3 above.
- b. To external service providers with whom the MFRC has entered into a contractual arrangement, directly or through CFMWS or another agency of Canada's Department of National Defence, under which the relevant external service provider is required to take appropriate measures to (i) ensure the protection of the confidentiality of the personal information communicated; (ii) ensure that the personal information provided is used only for the purposes of performing the services for the MFRC; (iii) ensure that the personal information communicated is not retained after the termination of the aforementioned contractual agreement and (iv) notify the MFRC without delay of any violation or attempted violation by a person of any obligation relating to the confidentiality of personal information communicated and (v) allow the MFRC to conduct any verification relating to the confidentiality of the personal information communicated.
- c. In the case of Data Subjects who have sent a job or volunteer application to the MFRC (i) to the *Service de police de la Ville de Saguenay* to conduct a criminal background check and (ii) to a body of the Department of National Defence of Canada to obtain the required authorization to hire the Data Subject, if applicable.
- d. To any other person or entity, where required or permitted by law or other normative instruments to which the MFRC is subject, or with the consent of the Data Subject.

It is possible that the MFRC communicates personal information to a person or entity belonging to one or other of the aforementioned categories located outside the borders of the province of Quebec.

In such a case, the MFRC will ensure that the legislative framework applicable to such communication is respected.

5. What are the measures taken by the MFRC to protect the confidentiality of your personal information?

The MFRC adopts physical, technological, and administrative safeguards to protect your personal information and reduce the risk of unauthorized and/or unlawful access, use, disclosure, and destruction.

Without limiting the generality of the foregoing, the MFRC:

- Verifies the identity and criminal background of all its employees and volunteers.
- Conducts a security screening process before allowing any employee or volunteer to access or process personal information.
- Require each of its employees or volunteers with access to personal information to sign a confidentiality agreement.
- Keeps personal information in recorded physical media in locked premises accessible only by authorized representatives of the MFRC.
- Stores personal information on a secure technological medium, namely the "Penelope™" case management software provided by Social Solutions Global Inc., on which identification and authentication system is set up in order to limit access to your personal information to authorized persons who need such access in pursuit of one or more of the purposes listed in Section 3 above.

Please note that the personal information you provide to certain professionals employed by the MFRC may be protected by professional secrecy. In such a case, the legal regime of professional secrecy prevails over the content of this Policy.

6. What measures does the MFRC have in place regarding privacy incidents?

The MFRC maintains a privacy incident log in accordance with applicable legislation. In the event of a confidentiality incident that may result in a risk of serious harm to you, the MFRC will take the necessary steps to notify you, in accordance with applicable legislation. The assessment of the risk of serious harm to you is made based on criteria such as the sensitivity of personal information involved in the privacy incident, the perceived consequences of its use, and the likelihood that it will be used for harmful purposes.

7. How long does the MFRC keep your personal information?

In accordance with our procedures for the secure retention and destruction of personal information, we keep your personal information for as long as necessary to fulfill the purposes outlined in Section 3 of this Policy or as long as necessary to comply with our statutory obligations, whichever comes later.

The MFRC reserves the right to close the file of a Data Subject where no administrative action has been taken for a consecutive period of at least two (2) years or, in the case of MFRC employees (excluding volunteers), for a consecutive period of at least seven (7) years from the date of employment termination, all subject to a statutory obligation providing for a different minimum retention period. Closing a file implies the complete and definitive destruction of the personal data it contains, or its anonymization for use for serious and legitimate purposes. In this Policy, the term "anonymization" means the process at the end of which personal data no longer irreversibly allows the direct or indirect identification of the Data Subject to whom it relates.

8. How can you access, correct, update, and/or obtain a copy of your personal information?

The MFRC recognizes the right of Data Subjects to access, correct, update, and obtain a copy of their personal information by submitting a written request to this effect to the CRFM. If such a written request is sent to the MFRC, the latter will ensure that it responds in writing and diligently, no later than thirty (30) days after receiving the said request.

In the event that the MFRC agrees to any request to obtain a copy of computerized personal information made by a Data Subject, the MFRC will communicate to them (or to any person or organization authorized by law to collect such personal information, as requested by the Data Subject) this copy in a structured and commonly used technological format. This subsection shall not apply (i) if disclosure of such a copy in such a technological format raises serious practical difficulties and/or (ii) with respect to any computerized personal information that has been created or inferred from other personal information.

In the event that the MFRC refuses to comply with any request for access, rectification or update made by a Data Subject, the MFRC will make sure that the Data Subject is notified of the reasons explaining this refusal as well as the remedies available to the Data Subject in the time frame within which they may be pursued. If requested, the MFRC will also assist the Data Subject in understanding the reasons for the denial.

In the event that a written request is sent to it to this effect by a Data Subject, the MFRC may also cease the disseminating personal information concerning the Data Subject and/or de-index or re-index, as the case may be, any hyperlink to the name of such Data Subject, subject to the criteria established by the applicable legislation then in force.

In principle, the exercise by a Data Subject of a right provided for in this section is free of charge. However, reasonable fees may be charged to the Data Subject to offset the costs of transcription, reproduction, or transmission of their personal information. In such a case, the Data Subject will be advised of the amount of the costs in question before the processing of their request.

9. What is the process for withdrawing consent to the use or disclosure of your personal information?

Subject to your contractual commitments with the MFRC and applicable legislation, you may withdraw or modify your consent to the collection, use and/or disclosure of your personal information. To do so, you must send a written request to this effect to the MFRC, using the

contact details indicated in Section 11 below.

Please note that the withdrawal or modification of your consent may limit the ability of the MFRC or prevent it from fulfilling or continuing to fulfill any of the purposes for which your information was collected, as set out in Section 3 of this Policy.

Please also note that the withdrawal or modification of your consent will have no effect on the personal information that has been destroyed or anonymized in accordance with this Policy.

10. The MFRC has no responsibility or liability with respect to Third Party Products (as defined below)

The Website and the MFRC's social media profile may contain links or references to other websites or third-party products and services (collectively: "**Third Party Products**"). Third-Party Products may be subject to terms of use and privacy policy that differ from those of the MFRC. The MFRC shall in no event be referred to or held liable in connection with any obligation arising from the content of the terms of use and/or the privacy policy of these Third-Party Products. Without limiting the generality of the foregoing, the MFRC has no responsibility or liability regarding your personal information that may be collected, used, disclosed, and retained by any person or entity in connection with your access to or use of Third-Party Products.

Any link available on the Website and/or the MFRC's social media profile to a Third-Party Product does not imply or mean that the MFRC endorses or accepts any responsibility for the content or use of such Third-Party Product. The MFRC makes no representations regarding the quality, safety, suitability or reliability of Third-Party Products, or the content or materials contained therein. When accessing or using Third-Party Products, you should review the terms of use and privacy policy associated therewith.

11. How can you contact the MFRC in relation to this Policy?

We are responsible for your personal information. Accordingly, we have designated a person who exercises the role of Privacy Officer within the MFRC. To exercise any of your rights, ask questions, make comments, or file a complaint regarding this Policy or our processing of your personal data, please contact:

c/o: M. Michel Cécyre, Chairman of the Board and Chief Privacy Officer
Military Family Resource Centre Bagotville
1775, rue Lucien-Lecompte
Saguenay (Québec) G0V 1A0

Email address: confidentialite@crfmbagotville.com

Please note that the MFRC may be required to verify your identity before responding to any request, question, comment, or complaint to its Privacy Officer.