



CAAP-Island of Montreal Privacy policy

1)

Our website does not use cookies (functional, preference, statistical, advertising/marketing, etc) and uses the HTTPS protocol. Therefore, no cookie banner is required. Cookies are always marked as rejected. The website cannot identify a person or sensitive personal information.

2)

Recently, the *Act to modernize legislative provisions as regards the protection of personal information* (commonly known as Law 25) places new obligations on organizations regarding cybersecurity and the protection of personal information. Our CAAP acts in full compliance with the Act. Based on the evolution of applicable rights and laws, we will adapt the *Policy* in order to ensure its compliance and make it available for consultation at all time at www.caapidm.ca.

1. Your consent while using our web site

As several laws designed to protect your personal information with regard to health and social services have recently been modernized, the present CAAP-Island of Montreal *Privacy policy* describes how we handle and protect personal information collected via technological means (i.e., email, our data management system platform or with our website). We abide by the following rules to protect your private life and comply with our legal obligations.

As you access and browse our site, you acknowledge that you have read our Policy. You consent to the collection and processing of your personal information.

It should however be pointed out that the high level of confidentiality associated with technological innovations does not ensure maximum security, that there is a certain degree of risk when using internet to communicate personal information. We advise not to disclose personal information such as a social insurance number through email. Our CAAP follows suit and does not answer questions by email when it implies transmitting sensitive data.

2. Our secure digital protection on the web as well

We take into account major cybersecurity issues. Since our current website was created, our server started protecting our content through encrypted transmission and strict measures enabling our data to be secured. Through strictly limited access to read-only data using *Content*

Management System, CMS Sécurité, our content and data are safely managed, protected and updated according to the development of technologies over the time.

3. How we use your personal information

Our Policy informs and helps you make a reasoned decision regarding your personal information and how it is used. During the entire procedure period with CAAP-Island of Montreal, you will have access to any documents with regards to your file with us. We will first carefully remove any personal information that may concern a third party.

Our secured computer database enables us to keep your personal information for the duration of services with our CAAP. Depending on the context, it means one (1) or two (2) years following the end of our services with you (see the table [Document retention period depending on service offered – CAAP-Island of Montreal](#)). However, anyone may decide when to close their file by making a precise request thereabout to our CAAP management. In addition, ephemeral communication containing confidential elements not to be retained, such as verbal exchanges, emails, handwritten notes, e-notes, and so on, are destroyed on a regular basis.

Personal information directly or indirectly identifies a natural person. They cannot be shared without the consent of the person concerned, subject to exceptions. By no means does our CAAP authorize the sharing of personal information (free mailing or sale of the list of names, transmission of data like medical data).

When you request information, we only collect and process the following information, including the date of the request:

- last name and first name
- gender
- date of birth or age group
- language
- postal address
- phone number
- email
- if applicable, source of your reference.

We use this information for data management and statistical purposes; our statistics are systematically depersonalized and anonymized.

In addition to the information specified with the information requests regarding your **request for assistance and support (complaint, support/advice, report)**, other useful information is given to meet your needs, including:

- The health and social services institution or organization in question;

- When necessary, the name of the third party or parties involved (parent, caregiver, child, friend, representative), as well as participants from the Complaint examination system [commissioner, medical examiner, ombudsman and review committee];
- When necessary, other sensitive information are added to your consent or your participation, in collaboration with a third party (another professional, one of your relatives, a local resource or organization).

In accordance with our legal obligations, your personal information is not used nor shared for purposes other than meeting your requests for services with our CAAP. These obligations also apply to follow-ups, when we gather contact or other forms and progress notes (discussion summary, emails between individuals concerned), emails, attached files: letter of complaint, authorization, text or audio file, image, other; sensitive elements such as medical data).

Our CAAP staff is authorized to access personal information insofar as such access is necessary to perform a task as required for a file, i.e., when the person usually in charge of your requests is not available.

4. Your rights regarding your personal information

You have free **access right** to the information we have collected. You may request access to your own information.

The **right to rectification and deletion** of your information. You may refuse or request for the collection of your information to stop. This may hinder the work of our CAAP and weaken the resolution of the problematic situation. Our CAAP is therefore committed to keep you informed so that you are able to make a reasoned decision. Any rectification or deletion request must be forwarded to the person in charge of the protection of personal information at our CAAP.

The **right to object** to the use of your personal information by an organization. At any time, you may object to an organization using some of your information for a specific purpose. In our CAAP, our staff must mention any systematized notification (telephony and messaging system) specifying that our CAAP does not share the information collected with any organization.

The **right to oblivion**, also referred to as “right to be forgotten”. You may ask for some search results associated with your name not to be displayed anymore in the online search engine used by our CAAP.

5. Who is in charge of the Privacy Policy

In accordance with the *Act respecting Access to documents held by public bodies and the Protection of personal information*, our CAAP management and team are in charge of access to information and protection of your personal information, as well as responsible for ensuring compliance with the rules laid down in our *Policy*. If you want more information about this

Policy, if you have any comments about it or if you wish to make a complaint because you think that our Policy has not been complied with, you may contact our CAAP management:

Privacy Policy

Current Executive Director
CAAP-Island of Montreal
514 861-5998 ext. 228
direction@caapidm.ca

4900, Jean-Talon Ouest, suite 210
Montreal (QC) H4P 1W9

6. What government legislation requires

Our CAAP has 30 days to reply to your request for access, rectification or deletion and objection to the processing of personal information or processing of your complaint. Due to some constraints, if our CAAP cannot process your request within the 30-day period stipulated by *the Act respecting the protection of personal information in the private sector*, you will be notified in writing. **In the absence of a reply from us** by the end of this period, you may contact the **Access to information commission** in order to file a request to examine a disagreement, within 30 days of the deadline.

Any person may make a complaint with the Quebec Access to information Commission (CAI). It is the public organization responsible for the *Act respecting access* and the *Act in the private sector*. The CAI ensures that citizens' right to access documents from public organizations and the protection of their personal information prevail. The policy has been approved and came into effect on September 22, 2023. See contact details:

Access to information commission

(Update into effect since December 1st 2023)

www.cai.gouv.qc.ca

Quebec City

Suite 2.36
525, boulevard René-Lévesque Est
Quebec City (QC) G1R 5S9
Phone: 418 528-7741
Fax: 418 529-3102

Montreal

Suite 900
2045, rue Stanley
Montreal (QC) H3A 2V4
Phone: 514 873-4196
Fax: 514 844-6170

Our *Policy* has been approved by the Board of Directors on January 8, 2025.