

**Policy concerning the collection, use and confidentiality of personal information**

POPIR housing committee invites you to read its privacy policy to learn about the rules that apply to the protection of personal information.

Your right to privacy and the protection of personal information are essential to us, which is why, through this Policy, we intend to protect your personal information in accordance with current legislation.

## What is considered personal information?

## For the purposes of this Policy, "personal information" means any information about an identified individual or any information that makes it possible to identify an individual. Wherever possible, we will anonymize, pseudonymize and/or aggregate such information so that it no longer identifies an individual.

## Who is impacted by this policy?

## The various elements of this policy apply to everyone who interacts with our organization. We will continue to apply this policy to personal information even after the purposes for collecting, using, or disclosing it has been fulfilled.

**Here are some examples of how this policy may apply to you:**

* You have contacted us by any means
* You have used our website
* You have participated in a survey
* You have applied to work at POPIR
* You have used our services for any reason
* You are currently using our services

## We will always ask you for your consent, unless the current legislation allows us not to do so

**When will we ask for your consent?**

* We will ask for your consent before collecting, using, or disclosing your personal information.
* In some cases, we may assume that we have your consent, in instances where the law allows us not to obtain it.

**How will we obtain your consent?**

We may obtain your consent in the following ways:

* In writing
* Verbally
* By phone, this includes by automated messages (voice mail)
* Through electronic or digital devices

**What is the duration and scope of your consent?**

Your consent is valid for as long as it takes us to achieve the purposes for which we have requested it. It remains valid thereafter to fulfill our retention obligations described in this policy.

Your consent is valid only for the purposes we have identified with you. If we wish to collect, use or disclose your personal information for other purposes, we will ask for your consent again, except as described in the following section.

**In instances when we do not ask for your consent?**

We may use your personal information without your consent if we are permitted to do so by law and if it is consistent with the purpose of the collection.

We may also use or disclose your personal information without your consent to comply with our legal obligations.

## How we collect your personal information

**From whom?**

We may collect your personal information from various sources:

* You, when you interact with us.
* From other individuals or organizations. For example: your employer, healthcare professionals, government agencies and public databases that may hold information about you.

**In which manner may we collect it?**

We may collect your personal information in a variety of ways. For example, we may :

* By phone
* In person
* By using our forms and digital interfaces
* By using digital or social networking technologies that allow you to be identified, located or profiled.
* By consulting public registries (e.g. the docket of the Housing Administrative Tribunal website)

## Which personal information do we collect

We limit ourselves to collecting the essential. We collect the personal information necessary to achieve the purposes listed in this section.

**Here are some examples of what we may collect, use or disclose:**

Information in order to identify you:

* Last name and first name
* Date of birth
* Postal address or email
* Phone number
* Age

Digital information (website, social media, etc.)

* IP Address
* Location data
* Information about your device, operating system, or browser
* Browsing preferences and habits

Information about your interactions and communications with us

* Reasons why you contacted us
* Written communication with us (for example, letters or emails)
* Notes, reports and history of your communications with us
* Information on your requests for information, dissatisfactions or complaints
* Prefered language of communication
* Survey answers
* Your interactions with our publications on social networks

## Why do we collect, use and share your personal information

We use your personal information to provide you with support and to meet our legal obligations. We may also use it to share our activities with you, and to inform you of events that may be of interest to you, if you consent.

We do our best to ensure that your personal information is accurate, complete and up-to-date when we use it. We rely on your cooperation to inform us when this information changes.

We collect, use, store and disclose your personal information for the following purposes:

**To offer you assistance:**

* Identify you in order to carry out an appropriate follow-up with you
* Understand your situation, profile, needs and objectives
* Evaluate your requests and determine whether we can meet your needs
* Update your file
* Handle your inquiries, dissatisfactions and complaints

 **To improve our programs and follow-up**

* Obtain your opinion on your interactions with us and on our follow-up and activities.
* Conduct studies and research, such as designing and applying statistical models.

**To act in accordance with our legal obligation**

* Protect your security and ours
* Detect and prevent misrepresentation, fraud, cyberthreats and other legal violations

**Tell you about our various activities and events**

To communicate our activities and events, according to your communication preferences (for example: mail, e-mail, text message, telephone, with our applications and websites, or those of other organizations).

## Third party communications

**Who are we legally permitted to share your personal information with**

We do not share your personal information with companies, organizations, or individuals outside of POPIR with the exception of our authorized suppliers and partners who need access to the information. Again, we keep only the essential information and when possible we anonymize the information in the following cases:

* Google Analytique - The information collected by this tool includes, for example, the pages you visit, the date, time, duration and frequency of your visits, and the links you click on. The type and language of your computer's operating system, the name of your Internet service provider and your geographical location (region) are also part of the information collected.
* For storage on cloud servers, in which case personal information may be transferred to third-party jurisdictions. Please note that we only retain the services of reputable companies with privacy policies.
* For external processing purposes: we transfer personal information to other companies or trusted third parties who process it on our behalf, according to our instructions, in compliance with this privacy policy, with a level of data security at least equivalent to our own and in compliance with any other appropriate security and confidentiality measures.

**We may disclose personal information outside Quebec or Canada**

Most of the time, we store your personal information in Quebec or Canada.

However, we sometimes use suppliers based elsewhere. We may therefore transfer your personal information to another country or province. This information is then subject to the laws of that country or province. We require suppliers to implement adequate security measures before we disclose personal information to them.

## How do we protect your personal information

**We limit access to your personal information**

Only those persons who need access to your personal information to perform their duties may do so. They only have access to the information necessary to achieve the purposes listed in this section. This applies to our team members, suppliers and external partners.

**We implement robust security measures**

We have implemented several types of measures to protect your personal information against loss, theft, and unauthorized access, use or disclosure. Among other things, we use cloud servers for any sensitive data we may hold. We also use security and hardware protection software. In the event of a potential data leak, rapid contact will be made with the individuals concerned and, in the event of a major cybersecurity incident, with the Access to Information Commission.

**We destroy your personal information once we have fulfilled our obligations**

We retain your information for as long as necessary to achieve the purposes listed in this section. Once you have completed your coaching, we will keep your file containing your information for a period of three years.

Once the retention period has expired, we permanently destroy your personal information.

## Your rights

**Modify your consent**

You may change your consent to the collection, use, disclosure and retention of your personal information, subject to certain limitations.

**Access and correct your personal information**

You have rights related to your personal information. You can ask us:

* To access your personal information
* To correct or update your personal information.
* To receive a copy of your personal information
* If information is disseminated publicly, to stop disseminating it (for example, remove a publication from our social networks)

**Here are the steps involved in processing a request:**

1. You must send a detailed written request to the person in our office who is responsible for the protection of personal information. The contact information for this person is provided at the end of this policy.
2. We will process your request within 30 days of receiving it.
3. You will receive a written response from us.

## You have a question or comment?

Our Privacy Officer is available to answer your questions. She ensures that the statements described in this policy and in the law are respected. If you have any comments or complaints about non-compliance with this policy, you may contact us in writing at :

**Our privacy officer**

Agathe Mélançon, chairman of the board

POPIR comité logement

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