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Note: Use of the masculine gender in the French version of this text also implies the feminine and is employed solely to facilitate reading.

1. PREAMBLE

The Institut national du sport du Québec (INS Québec) reviews its Privacy Policy governance framework in accordance with the evolution of the Privacy Act in the private sector. This Policy defines the guiding principles for ensuring the protection of personal information, the process for requesting access to a personal file, the process for requesting rectification, the mechanisms for reporting a confidentiality breach and the roles and responsibilities of INS Québec employees. These guiding principles will steer INS Québec employees in the gathering, use, retention and deletion of personal information held by INS Québec in order to ensure the protection of this information throughout its lifecycle.

2. CONSENT

Unless permitted by law, no personal information will be collected without first obtaining the consent of the individual concerned regarding the gathering, use and disclosure of the personal information.

When an individual gives consent, their personal information will only be used by INS Québec for the purposes defined in the consent requested. If the individual refuses to give consent, then the organization will only use their personal information for the sole purpose of communicating with them and will not disclose the information to anyone, except when an exception exists in the law to that effect. The individual may, at any time, inform the organization that they wish to withdraw their consent for the use and disclosure of their personal information in accordance with this Policy. The individual understands and agrees that this may prevent the organization from providing them with certain services.

3. COLLECTING PERSONAL INFORMATION

When collecting personal information in order to create a file on someone, INS Québec ensures that it informs the individual concerned, at the time of collection at the latest, of the following:

- The subject of the file;
- How the information will be used and who will have access to it within the Institute;
- The location where their file will be held as well as the rights of access or rectification.

Upon request, the individual can also be informed of the personal information collected from them, how long this information will be retained for and the contact information of the Privacy Officer.

4. USE OF PERSONAL INFORMATION

INS Québec uses personal information about athletes, coaches, its employees, its contractors, its partners and other third parties in order to fulfill its mission and functions. It will not use personal information for purposes other than those specified at the time of collection, unless it obtains the express consent of the individual concerned or if the Privacy Act allows it.

5. DISCLOSURE OF PERSONAL INFORMATION

INS Québec may, from time to time, share the nominal list of its athletes and coaches with partner organizations, after clearly informing them. A nominal list may include the names, sports and emails of individuals, if the following conditions are met:

- Sufficient opportunity was given to the athletes or other individuals affected to opt out of having their personal information shared in this way;
- The disclosure of the nominal list does not otherwise infringe on the individual's privacy.

However, personal information may be used for other purposes without the consent of the individual concerned, as described below:

- When its use is for purposes compatible with those for which it was collected;
- When its use is clearly for the benefit of the individual concerned;
- When its use is necessary for the purposes of study, research or the production of statistics, for which they are anonymized.

6. ACCURACY, RETENTION AND DELETION OF PERSONAL INFORMATION

INS Québec ensures that any personal information provided and in its possession is accurate, up to date and as complete as required for the purposes for which INS Québec uses this information. If the Institute discovers that the information is inaccurate, incomplete, or out of date, it will contact the individual to obtain up-to-date personal information and, if necessary, ensure that the third parties to whom the inaccurate information has been provided can also correct their files.

INS Québec only retains personal information for the period necessary for the reasons for its collection. This period may be extended after the relationship between the individual and INS Québec has come to an end but will only last as long as is required for the Institute to communicate with the individual, if applicable. When INS Québec no longer needs an individual's personal information, it is destroyed, deleted, erased or converted into an anonymous format.

7. PROTECTION OF PERSONAL INFORMATION

INS Québec is committed to maintaining an adequate level of physical, procedural and technical security in its offices and premises reserved for the storage of personal information to prevent any unauthorized form of access, disclosure, reproduction, use or modification of personal information. This principle also applies to IT security.

Only persons duly identified by INS Québec are authorized to view and process the personal information collected. INS Québec regularly audits security procedures and measures.

8. ROLES AND RESPONSIBILITIES

8.1 President and Chief Executive Officer of INS Québec

The President and Chief Executive Officer is responsible for:

- Acting as the Privacy Officer;
- Implementing this Policy and ensuring it is monitored and revised accordingly;
- Ensuring this Policy is complied with and implemented;
- Providing employees with the necessary resources to achieve the objectives of the Policy;
- Keeping the confidentiality breach log up to date;
- Informing the Commission d'accès à l'information and the individual concerned of any confidentiality breach that poses a risk of serious harm;
- Handling requests for access to information;
- Processing requests for rectifications;
- Planning and ensuring the completion of training activities;
- Receiving complaints relating to this Policy, determining their admissibility and, if applicable, forwarding them to the appropriate body, as provided for in Section 10;
- Ensuring external consultants and service providers sign a confidentiality agreement and take the necessary steps to enforce and comply with the Policy.

8.2 Employees and anyone working on behalf of INS Québec

Employees are responsible for:

- Complying with this Policy;
- Participating in awareness and training activities offered by INS Québec;
- Sharing the information required by Section 3 of this Policy when collecting personal information;
- Ensuring they have the required quality and consent before collecting or using personal information;
- Ensuring when disclosing personal information that the recipient has the required quality to receive it and that consent is given to permit such disclosure;
- Having a confidentiality agreement signed before disclosing personal information to an external consultant or service provider;
- Making reasonable efforts to minimize the risk of the unintentional disclosure of personal information;
- Taking the necessary precautions to ensure that personal information is not seen, overheard,

accessed or lost while working at premises other than the INS Québec offices;

- Taking the necessary precautions to protect the personal information to which they have access;
- Promptly reporting a confidentiality breach to INS Québec's Privacy Officer;
- Promptly reporting any disclosure to a third party made without the consent of the individual concerned to the Privacy Officer, as described in Section 5 of this Policy;
- Retaining personal information only for as long as necessary to fulfill the purposes for which it was collected, unless the law or regulations provide for a longer retention period;
- Collaborating in the search for documents and information that are the subject of any request for access;
- Ensuring they take the necessary safeguarding measures to guarantee the confidentiality of personal information when it is destroyed.

8.3 External consultants and service providers

External consultants and service providers with access to personal information held by INS Québec are responsible for:

- Complying with this Policy;
- Signing a confidentiality agreement and having a confidentiality agreement signed by any person who will be called upon to consult personal information in order to fulfill the contract;
- Sharing the information required by Section 3 of this Policy when collecting personal information;
- Ensuring they have the required quality and consent before collecting or using personal information;
- Ensuring when disclosing personal information that the recipient has the required quality to receive it and that consent is given to permit such disclosure;
- Making reasonable efforts to minimize the risk of the unintentional disclosure of personal information;
- Taking the necessary precautions to ensure that personal information is not seen, overheard, accessed or lost while working at premises other than INS Québec premises;
- Taking the necessary precautions to protect the personal information to which they have access;
- Promptly reporting a confidentiality breach to INS Québec;
- Promptly reporting any disclosure to a third party made without the consent of the individual concerned to INS Québec, as indicated in Section 5 of this Policy;
- Retaining personal information only for as long as necessary to fulfill their contract, unless the applicable law or regulations provide for a longer retention period;
- Ensuring they take the necessary safeguarding measures to guarantee the confidentiality of personal information when it is destroyed.

9. CONFIDENTIALITY BREACH MANAGEMENT

9.1 Definition

Within the context of this Policy, a confidentiality breach is:

- The collection, access, use or disclosure of personal information not authorized by the Privacy Act;
- The loss of personal information or any other breach of the protection of such information.

For the purposes of clarification, the following examples are considered confidentiality breaches:

- Accessing personal information that is not necessary for a person to carry out their duties;
- Exceeding the access rights that have been granted to a person to consult personal information;
- Using personal information from a database to which an individual has access in the course of their duties in order to impersonate an individual or alter information;
- Mistakenly disclosing personal information to the wrong person;
- The loss or theft of documents containing personal information;
- Forgetting to redact personal information in a document intended for a person who is not authorized to receive it;
- Sharing personal information without authorization with their team or group when some members are not authorized to receive this information;
- Being a victim of a cyberattack.

9.2 Handling a confidentiality breach

When INS Québec has reason to believe a confidentiality breach has occurred involving personal information that it holds, it must take reasonable measures to reduce the risk of harm and to prevent new incidents of the same nature from happening.

INS Québec shall immediately notify the Privacy Officer. INS Québec may also notify any person or organization likely to reduce this risk by disclosing only the personal information necessary for this purpose without the consent of the individual concerned. In the latter case, the Privacy Officer must record the disclosure.

If the confidentiality breach presents a risk of serious harm, INS Québec must diligently notify any individual whose personal information is affected by the incident. The Institute must also notify the Commission d'accès à l'information.

In order to assess the risk of harm to an individual whose personal information is affected by a confidentiality breach, INS Québec must specifically consider:

- The sensitivity of the information concerned;
- The anticipated consequences of its use;
- The probability of it being used for detrimental purposes.

9.3 Confidentiality breach log

INS Québec maintains a log of confidentiality breaches. This specifically contains:

- A description of the personal information affected by the incident;
- The circumstances surrounding the incident;
- The date on which the incident took place;
- The date on which the Privacy Officer became aware of the incident;
- The number of individuals affected or, if not known, an approximation of that number;
- The assessment of how serious the risk of harm is;
- If there is a risk of serious harm to the individual concerned, the dates on which they were notified;
- The measures taken in response to the incident.

The information contained in the log must be kept up to date and held for a minimum of five (5) years from the date or period during which INS Québec became aware of the incident.

10. ACCESS AND RECTIFICATION

Anyone can request access to the personal information concerning them, have inaccurate, incomplete or ambiguous information corrected in a file concerning them or have personal information deleted that is out of date or not justified by the subject of the file.

This request must be sent to INS Québec's Privacy Officer, the President and Chief Executive Officer, who can be reached at the following address: administration@insquebec.org. The request must provide enough specific information to enable INS Québec to process it.

INS Québec must respond to any request for access to or the rectification of an individual's file within thirty (30) days of receipt of the request.

If INS Québec refuses to comply with an individual's request for access or rectification, it must notify the individual in writing of its refusal, explaining the reasons for this and indicating their solution.

The individual whose request for access or rectification of personal information has been refused by INS Québec may submit, in writing, a request for a review of the disagreement to the Commission d'accès à l'information within thirty (30) days of the refusal of the request, briefly explaining the reasons in support of this request for a review of the disagreement.

INS Québec will not charge an individual for verifying or correcting their personal information.

11. PRIVACY POLICY COMPLAINTS HANDLING PROCEDURE

11.1 Filing a complaint regarding the Privacy Policy

Any employee of INS Québec and any individual who has entrusted personal information to INS Québec that has reason to believe that a confidentiality breach has occurred, and that INS Québec has failed to protect the confidentiality of the personal information it holds, may file a complaint to request that the situation be rectified. In an email to the Privacy Officer (administration@insquebec.org), the complainant must provide a description of the incident, the date or period when the incident occurred, the nature of the personal information affected by the incident and the number of individuals involved. In the event that the complaint questions the conduct of the President and Chief Executive Officer, it must be forwarded to the Chair of the INS Québec Board of Directors at presidenceCA@insquebec.org.

11.2 Handling a complaint

If applicable, the Privacy Officer at INS Québec is responsible for handling the complaint within a maximum of thirty (30) business days. In the event that the complaint proves to be justified, INS Québec shall take the necessary measures to rectify the situation as soon as possible in accordance with Paragraph 8.2 of this Policy. It shall record the incident in the log as described in Paragraph 8.3.

12. PENALTIES FOR NON-COMPLIANCE WITH THIS POLICY

Failure to comply with this Policy may lead to administrative or disciplinary measures, up to and including dismissal. The character, seriousness and repetitive nature of the alleged acts must be considered when determining a penalty.

Penalties for failings are also provided for in the Privacy Act.

As part of its contractual relationships with a third party, INS Québec may terminate any contract for non-compliance with this Policy without notice.

The Policy will be presented to all third-party contractors for INS Québec, who must undertake, in writing, to comply with it.

13. EFFECTIVE DATE AND REVISION

This INS Québec Privacy Policy was adopted by the Board of Directors on February 13, 2024. The Policy may be reviewed as required and at least every three (3) years.