

## **Privacy Policy**

#### **Policy objectives**

In carrying out our <u>mandate</u> under the <u>Privacy Act</u> legislation and regulations, Ada X collects, uses and shares personal and non-personal data about its members and users who use, purchase or access our website online or on any mobile device. The main purpose of this policy is to clarify the management of this data and to provide users with the following information:

- Personal data collected by Ada X;
- The use of the collected data;
- Who has access to the collected data;
- Users' rights with regard to the collected data;
- The site's cookie policy.

This policy complies with the laws set out in the <u>Personal Information Protection and Electronic Document</u> <u>Act</u> (PIPEDA) and <u>Bill 25</u>, which is overseen by the <u>Commission d'accès à l'information</u>, in Quebec.

#### Why Ada X collect personal information

Usually, the information collected by Ada X is related to online purchases, user participation in our programming activities, administrative purposes required for the internal management of operations and statistics requested by our funders. Ada X may use personal data only for the purposes for which it was collected, or for a use consistent with those purposes.

#### What Personal Information Ada X Is Collecting

Ada X only collects personal information that is directly related to our mandate and activities. Wherever possible, this information is collected directly from users, and the amount and type of information collected is only limited to the identified purposes. Ada X collects only what the organization needs to communicate, pay and obtain statistics from our members, users and suppliers for funders. Usually, this consists of first and last name, mailing address, email address, telephone number and, in some cases, banking information and social security number. Ada X may also collect personal information from other sources as required, including witnesses, employers, government or organizational files and records.

When you visit or consult the Ada X website, we may collect the user's IP address, the place of connection, the links clicked, the content consulted and the date and time of connection.

#### Consultation of personal information collected by Ada X

Ada X doesn't disclose personal information without the consent of the people concerned. In the case of disclosure with consent, Ada X undertakes to disclose only the specific information that is necessary in the circumstances of the request and, to the extent possible, to inform the person concerned.



Access to Ada X' personal information is limited to permanent team members who need the information to perform their daily tasks. These employees will treat the information as strictly confidential and will not provide access to this information to any unauthorized person.

Any person hired by Ada X under contract or otherwise to perform duties on behalf of the organization must comply with the provisions of applicable laws, as well as this policy and related internal procedures. Any breach of any part of the contractual agreement may result in the cancellation of the contract.

# Protection of Personal Information Collected by Ada X

Ada X is committed to protecting personal information and data against loss, theft, unauthorized access, use for disclosure, alteration or destruction through appropriate administrative, technical, and physical security measures and safeguards. The level of protection afforded to personal information depends on the:

- The sensitivity of the personal information;
- Amount, distribution and format of the information;
- Method of storage.

The methods used to protect the data collected by Ada X included:

- Staff training on privacy and the protection of personal information;
- Granting access to information on a "need-to-know" basis;
- Screening and security checks of employees and prospective employees in line with the sensitivity of the information those employees will be handling;
- Technical measures such as passwords, audit trails, encryption, firewalls and other technical security safeguards;
- Physical measures such as locked filing cabinets, restricted access to our offices and other areas where personal information is stored.

#### Consent

Wherever possible, Ada X seeks a person's consent before collecting their personal information. The form of consent may vary depending on the circumstances and the type of information being requested. Consent can be express or implied, and can be provided directly by the individual or by their authorized representative.

Ada X undertakes to give priority to express consent, whether verbal, electronic or in writing. Implied consent may be reasonably inferred from an individual's action or inaction, for example, providing a name, address, or telephone number to obtain an answer to a question. In determining the appropriate type of consent, Ada X considers the sensitivity of the personal information involved, the purposes for which it's collected and the reasonable expectations of the individual. If Ada X wants to use personal information for a new purpose, it will describe the intended use and ask for consent again.

Ada X will not use your personal information without your consent unless it's either:

- For the same purpose for which the information was originally collected or compiled;
- Consistent with that purpose;



- Required by law;
- Required for legal proceedings;
- To prove or protect Ada X's legal rights.

## Retention and destruction of personal information

Ada X ensures that all personal information is processed according to a life cycle pre-established by the organization's document retention schedule. In this regard, personal information that Ada X uses to take a decision about an individual will be retained for a minimum of two years and a maximum of seven years after that decision is made. This period is sufficient to allow any individual to seek legal recourse and exercise all their rights under the Privacy Act.

## Access or Corrections to Personal Information

Any individual may access and correct their personal information collected by Ada X informally, i.e., without using the Privacy Act. However, users have the right to formally request access to, or correct their personal information under the Privacy Act. Any person also has the right, under the Access to Information Act, to formally request access to information contained in Ada X files that may include personal information.

Any individual may choose to withdraw or change their consent to the collection and use of data at any time, if it's legally acceptable to do so and that Ada X is notified within a reasonable time. Any person wanting to delete or modify their personal information in any way should contact the person responsible for the protection of personal information:

Marianne Desrochers General and Administrative Coordinator at Ada X 201-4001 Berri Street, Montreal, Qc, H2L 4H2 protection@ada-x.org (514) 845-7934