



Privacy policy

Current version: 2023.09.22

This Privacy Policy (the "Policy") sets out YWCA Québec's practices regarding the collection, use, disclosure and retention of your personal information. For ease of reference, we refer to ourselves as the "YWCA" or simply "we".

"Personal information" is data that identifies you as an individual or allows us to identify you as an individual (such as your name, home address, telephone number or other information you provide to us in connection with our services).

Our Policy applies regardless of how we collect your personal information, whether in person, by telephone, by e-mail, or via our website. In certain situations, we may provide you with additional information regarding our handling of your personal information at the time of collection.

By accepting our Policy or by providing us with personal information after you have had an opportunity to review our Policy or any supplemental notice, you agree that your personal information will be treated in accordance with our Policy and the relevant supplemental notice.

1. To contact our Privacy Officer

You can contact our Privacy Officer :

By e-mail :	confidentialite@ywcaquebec.qc.ca
By post :	855 Holland Ave., Quebec City, QC, G1S 3S5 Attention: Personal information privacy policy.

2. Treatment of personal information

How we treat your personal information will depend on the nature of your relationship with us. Below is a description of how we process your personal information, it being understood that we may process your personal information as provided by applicable privacy laws:

2.1. When you browse our website

We collect your personal information directly from you. Unless you authorize us to do so, we do not collect any personal information when you browse our website.

We collect and use your personal data to enhance your experience when browsing our website and to suggest products that match your interests and preferences, as well as for general marketing and promotional purposes.

We may share your personal information with certain third parties, such as service providers who supply us with software and cloud services, for safekeeping. In addition, we may also use third-party service providers to help us understand your preferences and the products that may appeal to you.

We invite you to consult our Cookie Policy attached hereto as Appendix B, for further information regarding the treatment of your personal information in connection with the use of our website.

2.2. When you create an account or subscribe to our newsletter

In most cases, we collect your personal information directly from you, when you create an account on our site, log in to your account and subscribe to our newsletter. We may, however, collect your personal information from a third party such as a subscription manager. In addition, if you choose to create an account or log in to your account through a social media provider, we or the registration manager will collect your personal information from the operator of the social media platform used to log in to your account.

We collect your information in order to create and manage your account, communicate with you, keep you informed of events and send you promotional material.

We may share personal information with certain third parties, including service providers and/or partners who may assist us in managing your account, managing our newsletter, or providers of cloud-based software and infrastructure to store and process your personal information.

2.3. When you register for an activity or service and when you purchase a product

In most cases, we collect your personal information directly from you. We may, however, collect your personal information from a third party, such as a registration and subscription manager, an organization dedicated to facilitating access to recreation and fitness classes, a form administration software provider, or a third party designated by us to process a purchase or refund on our behalf.

We collect your information in order to provide you with the service or product you request, for statistical purposes, to manage participation, to administer fiscal and legal services and to offer affordable leisure and physical activity courses.

We may share personal information with certain third parties, including service providers and/or partners who may assist us in the management of activities and the sale of products, facilitate your access to leisure and physical activity courses, operate an e-commerce platform or provide cloud-based software and infrastructure to store and process your personal information.

2.4. When you interact with our foundation

In most cases, we collect your personal information directly from you, such as when you register for events and activities and when you make a donation to our foundation. We may, however, collect your personal information from a third party, such as a donor and gift manager.

Most often, we use your personal information to: to manage the Foundation and its administration, including to fulfill our obligations and rights arising from any agreement entered into with you; to ensure the safety of participants, employees and volunteers during our activities and events; to invite you to our events; to carry out philanthropic prospecting, by issuing calls for donations or inviting you to renew a donation; to prevent fraud, to meet our legal or regulatory obligations regarding the disclosure of information, to protect the rights of third parties and to provide you with tax receipts.

We may share personal information with certain third parties, including service providers and/or partners who may assist us in organizing events, soliciting and managing donors and donations, where we are required to do so by law, or providers of cloud-based software and infrastructure to store and process your personal information.

2.5. When you request our hosting services

In most cases, we collect your personal information directly from you. We may, however, collect your personal information from a third party such as another housing organization.

Most often, we use your personal information to: manage and administer the units, including fulfilling our obligations and rights under any agreement we have with you; ensure the safety of tenants, visitors and employees; prevent fraud; enforce our rights; or to meet our legal and regulatory obligations.

We may share personal information with certain third parties, in particular, service providers and/or partners who assist us in rental management, data management on the cloud in order to store and process

your personal information or when we are required to do so by legal (including tax) and regulatory requirements.

2.6. When you request support from our employees or volunteers

In most cases, we collect your personal information directly from you. We will collect your personal information when you interact with one of our members, either by e-mail, telephone or in person.

We collect your personal information in order to validate your identity to ensure that we are speaking to the right person, to access your history as a customer and/or member with us or to respond to your questions and requests.

We may share personal information with certain third parties, including service providers and/or partners who assist us in providing products and services.

2.7. When applying for a position as a YWCA employee, volunteer, director or committee member

In most cases, we will collect your personal information as part of the recruitment process directly from you. If your application is submitted via a recruitment agency, another employee when you are referred, or a website, social network or platform offering application collection services (such as LinkedIn, Jobbom, Joillico, Indeed, etc.), we are likely to collect your personal information from this third party. We may also collect personal information about you from your references, former employers, school and other third-party service providers we use for background and reference checks.

We collect your personal information in order to :

- i. Identify and evaluate your application, including assessing skills, qualifications and interests;
- ii. Verify your information and carry out employment, background and reference checks where necessary;
- iii. Communicate with you about the recruitment process and your application;
- iv. Find out about other positions that might be suitable for you, and take them into consideration;
- v. Keep records of your recruitment process;
- vi. Comply with our legal, regulatory or corporate governance requirements; and
- vii. Analyze and improve our application and recruitment process.

We will only disclose your personal information to third parties if required to do so by law or to our employees, contractors or third party service providers who need it to help us manage the recruitment process, including service providers who provide services to us or on our behalf. For example, we may use third-party service providers for a variety of purposes, including, but not limited to, obtaining employment and background checks. Finally, we rely on service providers who provide cloud-based software and infrastructure to store and process your personal information on our behalf.

2.8. When you are a YWCA employee, volunteer, director or committee member:

In addition to the personal information collected as part of the recruitment or selection process, we will collect personal information throughout your employment with the YWCA, as appropriate: through your communications with us by e-mail, telephone or in person; through one of our portals or those of third parties; through one of our forms and as part of any disciplinary, merit or performance assessment procedure, in order to, among other things, ensure your safety and that of others, communicate with you; remunerate you; monitor your performance and determine any salary increases or promotions; process your applications linked to benefits and entitlements; as well as update your file.

In most cases, we collect your personal information directly from you. We may also collect information from third parties such as your supervisor, other employees, the group insurer, a human resources and payroll manager, your physician, the government and other public bodies.

Disclose your personal information to third parties. For example, software and cloud-based infrastructures to store and process your personal information on our behalf, for payroll administration, management of certain benefits, union, and will share your personal information with the government, including for tax purposes.

2.9. Minors under 14

We do not voluntarily collect personal information from individuals under the age of 14 without parental consent. Information is normally collected by means of a form.

If you are a minor under the age of 14, you may not provide us with personal information without the express consent of a parent or guardian.

If you are a parent or guardian and are aware that your children have provided us with personal information, please contact us.

If we discover that we have collected personal information from an individual under the age of 14 without the individual's consent, we may ask the individual to provide us with the information.

we will take the necessary steps to delete this information from our systems.

3. Access to your personal information within YWCA and externally

The following people will have access to your personal information, only when necessary to accomplish the purposes to which you have consented:

- i. YWCA employees, committee members and volunteers who need it for the purposes of their duties. Internal controls ensure that only authorized individuals have access to the information they need to perform their duties. Please refer to our Summary of our Privacy Governance Policy in Appendix A for further details;
- ii. Our affiliated service providers in order to better serve you and support our operations, for example payment service, customer management system, hosting services, maintenance, accounting, mailing list managers and other services for the purposes indicated in section 2 above;
- iii. To service providers or suppliers offering a product or service in collaboration with us for the purposes indicated in section 2 above;
- iv. Our service providers for the management of our employees, volunteers and committee members to support our human resources, for example group insurers or payroll providers for the purposes indicated in section 2 above;
- v. Government authorities for any applicable legal or regulatory requirements; and
- vi. To all other persons where required or permitted by law.

4. Fully automated decisions based on your personal information

We will not make fully automated decisions about you.

5. Identification, profiling or location technologies we use

We use technologies to identify you, locate you or profile you.

Please refer to our policy on the use of cookies and identification, profiling and location technologies in [Appendix B](#).

6. How long we keep your personal information

We will retain your personal information until the purposes for which it was collected have been fulfilled. However, we may retain your personal information for a longer period.

when required to comply with our legal and regulatory obligations to retain or preserve information or records.

To find out more about how long we keep personal information, please contact our Privacy Officer.

You understand that your consent is valid for this period, unless you exercise your right to withdraw your consent, with the consequences that such a request entails, as described below.

7. Where your personal information is stored and transferred outside Québec

Some of your personal information is also physically archived and stored on paper at the YWCA offices. All physically-held personal information is protected by secure and restricted access at its physical location.

Your personal information is also held virtually on a number of servers and platforms, including YWCA servers and those of cloud service providers we use, as well as on the servers of third-party service providers such as certain employees' e-mail boxes, Microsoft and Google Forms. When using these platforms, your personal information may be transferred and hosted outside Quebec by these suppliers.

When we consider that the disclosure of your personal information outside Quebec is necessary for the purposes of our operations, we will assess whether or not your personal information would benefit from adequate protection in the event of disclosure. We will only disclose your personal information if we are satisfied that it is adequately protected.

8. Protective measures and inherent risks

We deploy appropriate security measures to protect your personal information. In particular, we have put in place appropriate physical, technical and administrative safeguards to ensure the protection of personal information.

Despite these measures, given the risks inherent in the use of computer systems, we cannot ensure or warrant the security and confidentiality of any personal information you transmit or provide to us, and you do so at your own risk.

If you have reason to believe that personal information has been compromised, please contact our Privacy Officer.

9. Your rights regarding your personal information

By law, you have various rights with respect to your personal information. In particular, you have the following rights:

9.1. Access to your personal information

You may ask us whether we hold any personal information about you and, if so, request access to that personal information.

9.2. Rectification

You may ask us to rectify any incomplete or inaccurate personal information we hold about you.

You can correct your personal information yourself through your account or by contacting our Privacy Officer. Our goal is to ensure that the personal information we hold about you remains accurate, up-to-date and complete.

9.3. Withdrawal of consent

You may withdraw your consent to the disclosure or use of the personal information we hold about you.

You understand, however, that in such a case, you may no longer be able to benefit from certain products and services.

9.4. Portability

As of September 22, 2024, you may ask us to disclose your personal information to you or to transfer it to another organization in a structured, commonly used technological format.

9.5. Stop distribution or de-indexing

You may ask us to stop disseminating your personal information or to de-index any hyperlink attached to your name allowing access to this information by a technological means, when the dissemination of this information contravenes the law or a court order.

You may also request that the hyperlink providing access to this information be re-indexed, if the dissemination of this information causes you serious harm with regard to the right to respect for your reputation or your private life when certain conditions provided for by law are met.

10. Exercising your rights

To exercise any of your rights, please contact our Privacy Officer.

11. Complaints about our handling of your personal information

YWCA takes inquiries, complaints and comments about our handling of your personal information very seriously. We invite you to contact our Privacy Officer if you have any complaints or comments about our privacy practices.

Your complaint will be reviewed by our Privacy Officer, who will determine whether the processing of your personal information complies with our privacy program and any applicable laws.

Our goal is to do our best to resolve your complaint. We aim to respond to every complaint politely, promptly and ideally within 30 days.

You may also file a complaint with the *Commission d'accès à l'information du Québec* using the form available [here](#). However, we invite you to first contact our Privacy Officer.

12. External sites or services

This Policy does not apply to, and we are not responsible for, any third-party websites, pages or applications that may be accessed through our website, products or services. If you follow such links, these third-party sites or services may have their own privacy policies that you should review before submitting your personal information.

13. Updating this Policy

We may change our Policy from time to time at our sole discretion.

Prior to coming into force, the proposed amendments will be published on the YWCA website, together with a notice of change. The proposed amendments will come into force on the date specified in the relevant notice of change.

14. Approval and entry into force

Our policy was approved by the Privacy Officer on 22/09/2023 and is effective as of that date.

Appendix A: Summary of our privacy governance policy

YWCA is committed to protecting your personal information throughout its life cycle in accordance with its privacy program and in compliance with the requirements of applicable laws.

To this end, in addition to our Privacy Policy, the YWCA has adopted a Personal Information Governance Policy, the purpose of which is to set out the principles governing the protection of personal information in the context of our operations.

The objectives of our governance policy are :

- i. ensure that your personal information is handled appropriately, securely, correctly and transparently;
- ii. establish guidelines for the handling of personal information by YWCA throughout its life cycle; and
- iii. define the roles and responsibilities of the Privacy Officer and those of our staff.

1. Roles and responsibilities

Because respecting your personal information is everyone's business at YWCA, our Privacy Officer is supported by a multidisciplinary team that includes members of each of our business units as well as external advisors, as needed.

Every member of our staff has a role to play in ensuring that we act in accordance with our privacy program. In fact, every member of our staff is called upon to :

- i. direct any questions or comments about how we handle or should handle your personal information to the Privacy Officer;
- ii. participate in training and awareness-raising activities on the importance we attach to protecting personal information;

2. Corporate governance guidelines

YWCA recognizes the importance of protecting the confidentiality and security of the personal information it handles in the course of its activities, and of making its employees and partners aware of this.

YWCA has prepared guidelines of good and prohibited practices regarding how we may handle your personal information, for example:

- i. We identify the purposes and objectives for which we collect your personal information. Thereafter, your personal information is used only in accordance with those purposes.
- ii. If we identify new purposes, we will seek express consent to allow us to process your personal information in accordance with these new purposes, unless the law allows us to do otherwise;
- iii. we seek to collect only the bare minimum in order to achieve the identified purposes;
- iv. we strive to obtain your consent at the time we collect your personal information, and where sensitive personal information is involved, we seek your express consent;
- v. we display our privacy policy in a clear and visible manner when we collect your personal information through a technological means;
- vi. we ensure that our technological products or services with privacy settings offer the highest level of privacy by default, without any intervention on your part;
- vii. we do not use technologies that allow identification, location or profiling without disclosing this practice and informing you how to activate such features;
- viii. we ensure that your personal information is complete and up-to-date when we use it;
- ix. we conduct Privacy Impact Assessments when required by law, and when we consider that processing your personal information involves risks to your privacy;
- x. To the extent possible, we restrict access to your personal information to those members of our staff and our service providers who need to have access to it in order to carry out our operations;
- xi. when we make fully automated decisions using your personal information, we ensure that you are informed of the use of such technology and we have a process in place for you to submit your comments;
- xii. we do not share your personal information with third parties without your consent, except where permitted by law.

3. CONFIDENTIALITY INCIDENT

YWCA has set up a process to respond to and handle confidentiality incidents.

Under this process, YWCA must take reasonable steps to reduce the risk of serious harm and review its practices to prevent future privacy incidents of a similar nature.

YWCA documents all Privacy Incidents in its Privacy Incident Log and will adjust its privacy program as necessary following a Privacy Incident.

APPENDIX B

Use of cookies and identification, profiling and location technologies

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This Appendix complements our Privacy Policy and should be read in conjunction with it.

1. Cookies and web beacons

1.1. What are cookies and Web beacons?

Cookies are small text files that are downloaded to your device when you visit a website or download an e-mail. Cookies enable a website to recognize a device and store information (e.g. about your preferences, your use of the website) and to read this information each time you access the website.

There are two types of cookies: (i) primary; and (ii) third-party. Essentially, both types are technically identical and perform the same functions; the main difference lies in how they are created and then used.

Primary cookies. Primary cookies are created by the website you are visiting. A Web site can only access the cookies it has placed on your device, so, for example, cookies placed when you visit a search engine are not accessible by our Web sites.

Third-party cookies. Third-party cookies are created by a site other than the one you are visiting and are mainly used for profiling purposes and behavioral advertising. They also enable Web site owners to provide certain services. This type of cookie may be placed via what is known as a Web beacon (more on this below). Since a Web site can only access cookies it has placed itself, we cannot access third-party cookies placed on any of our Web sites.

A web beacon, often referred to as a pixel tag, is a transparent image, usually 1 pixel x 1 pixel, that is placed on a website or in an e-mail to evaluate how a user interacts with specific content. Web beacons work by sending information along with the request to the third-party web server when the request to display the web beacon is made.

1.2. What can you do to control cookies placed on your computer?

Most browsers allow you to configure how cookies are accepted by your browser. Please bear in mind that changing your cookie settings may prevent certain websites from functioning properly. Please consult your browser developer's documentation to find out how to configure your cookie settings:

[Google Chrome](#)
[Mozilla Firefox](#)
[Android Browser](#)
[Internet Explorer](#)
[Safari \(computer\) / Safari \(mobile devices\) Edge](#)

You can also use your browser's private or incognito mode, which will automatically delete any cookies placed while you are in private mode when all private mode tabs are closed. See your browser's help section for more information on how private mode works.

Some recent browsers have built-in functionality to block or control profiling content. Please consult your browser's help section to see if such functionality is available.

Some browsers may have extensions created by third parties that can be used to manage and delete cookies. If you decide to use extensions, please pay particular attention to the extensions you install and the permissions they require.

Please note that deleting cookies may reduce your user experience on the Website. In addition, deleting cookies may prevent you from using certain features.

2. Use of cookies on our website

2.1. Why do we use cookies and what types of `cookies` are used on our websites?

We use cookies and web beacons to, among other things:

- i. Website operation: these cookies cannot be deactivated in our systems. They are generally set in response to actions you perform that constitute a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or inform you of the existence of these cookies, but some parts of the website may be affected. These cookies do not store any personally identifying information.
- ii. Website performance and optimization: These security and analytics cookies enable us to determine the number of visits and sources of traffic, in order to measure and improve the performance of our website. They also help us to identify the most and least visited pages and to evaluate how visitors navigate the website. If you do not accept cookies, we will not be informed of your visit to our site.
- iii. Web site personalization and improvement: These cookies are used to improve and personalize the functionality of the Web site. They may be activated by our teams, or by third parties whose services are used on the pages of our Web site. If you do not accept these cookies, some or all of these services may not function properly.
- iv. Targeted advertising: These cookies may be set on our Web site by our advertising partners. They may be used by these companies to profile your interests and serve you relevant advertisements on other Web sites.

They do not directly store personal data, but are based on the unique identification of your browser and Internet device. If you do not authorize these cookies, your advertising will be less targeted.

- v. Creation of user profiles: These cookies are used to create user profiles in order to display advertising or track usage on websites for marketing purposes.
- vi. Promoting our activities on social networks: These cookies are placed on our website to promote content on Facebook, Twitter, LinkedIn, Instagram, etc.

In addition, we use Web beacons in our promotional e-mails to collect statistics on e-mail opening and interaction with e-mail content in order to analyze the performance of our promotional campaigns. We use your interaction with our promotional e-mails as an indicator of your interest in our products and services. We may adjust the way we contact you based on your interaction with our promotional e-mails.

3. Tools for statistical, security and analytical purposes to measure interaction with our website and promotional material

3.1. What you need to know about analytics

Analytics tools are used to collect, analyze and measure web traffic and user visits to our websites in order to understand and optimize their use. Analytics work by collecting information about a visitor's interactions with one or more web pages. This information includes, for example, the visitor's IP address.

3.2. What analytics tools do we use on our websites?

3.2.1. Google Analytics and Google Ads

We use the Google Analytics tool offered by Google Inc. to collect information about how visitors use our websites. We use the reports compiled by Google Analytics to help us improve our websites.

The information is collected anonymously and includes :

- i. the country and city from which you access our websites;
- ii. demographic information based on information Google already has about you from your interactions with other websites;
- iii. the number of visitors to our websites and the pages visited.

Further information on the information made available to us by Google Analytics can be found on this [page](#).

When we send your IP address to Google for use with Google Analytics, we anonymize it by truncating its last 3 digits. The Google Analytics Terms of Use prohibit us from sending personal information to Google via Google Analytics.
Visit

information about your interaction with our websites will be transferred to and stored by Google.

If you wish, you can prevent Google from recording information about your browsing by installing the Google Analytics deactivation browser add-on on your computer. This hyperlink will open in a new window. On mobile, you can use a private browser or use the "incognito" mode.

3.2.2. Pixels

YWCA also uses tracking pixels for advertising purposes. Tracking pixels are images, generally one pixel in size, whose loading when visiting a Web site triggers a request to a third-party server to collect information about the Internet user. Tracking pixels work in tandem with cookies. They enable us to measure the effectiveness of our advertising by tracking the actions taken by Internet users when they click on one of our ads. The data collected enables the YWCA to compile statistics that will be used to optimize advertising, in particular so that it reaches the appropriate audience more effectively.

For more information on the tracking pixels of the various suppliers, please visit the following websites:

- [Meta Pixel](#)
- [Google Privacy Policy](#)
- [LinkedIn Inside Tag](#)

3.3. How are we going to use the information we've gleaned from the analytics tools?

We rely on analytics tools to obtain information about you for these purposes:

- i. Improve our Web sites based on the interactions of our visitors;
- ii. Evaluate the effectiveness of our promotional campaigns;
- iii. To better understand the path taken by our visitors: from the original campaign to becoming customers;
- iv. Establish marketing profiles and qualify potential customers; and

4. How do we update this Policy?

We may change our Policy from time to time at our sole discretion.

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