



Privacy Policy

1. Purpose

The purpose of this Privacy Policy is to help you understand our practices regarding the collection, use, disclosure and retention of personal information.

By providing us with personal information (by e-mail, in person, by telephone, through our website, by completing an event participation form, or otherwise), you agree to its processing in accordance with this Privacy Policy, and you authorize CECI, its partners and service providers to process your personal information for the purposes set out below.

This policy does not apply to third-party websites that can be accessed by clicking on links found on CECI's website, and CECI is therefore in no way responsible for such websites. If you follow a link to a third-party website (e.g., Défi sportif), that site will have its own privacy policies that you should review before submitting any personal information.

2. WHAT PERSONAL INFORMATION DO WE COLLECT?

We may collect and process different types of personal information in the course of our activities, such as:

- professional and/or personal contact information, such as your name, physical address(es), e-mail address(es), date of birth and telephone number(s);
- biographical information, such as the name of an employer, professional and/or personal background, social involvement, professional affiliations;
- photos and video or audio content;
- information relating to communication preferences, as well as related information such as comments or survey responses;
- information relating to contribution history, participation in organizational events, financial information, such as billing address, bank account information or payment data;
- recruitment information, such as curriculum vitae;
- website usage and other technical information, such as details of visits to our site, your interaction with our online content, or information collected through cookies and other tracking technologies;
- any other personal information you provide.



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Please note that if you provide us with personal information about other persons (such as your customers, directors, officers, shareholders or others), you must ensure that you have duly notified them that you are providing us with their information and that you have obtained their consent to such disclosure.

We do not knowingly collect information from children or others under the age of 14. If you are a minor under the age of 14, please do not provide us with any personal information without the express consent of a parent or guardian. If you are a parent or guardian and you are aware that your children have provided us with personal information, please contact us. If we learn that we have collected personal information from minor children without verification of parental consent, we will take steps to delete that information from our servers.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect your personal information from you and during our interactions with you, including:

- when you register for events, training and newsletters;
- when you register for benefit events;
- when you make a donation to our organization, in whatever form;
- when you register as a volunteer for our organization;
- when you apply as an employee or volunteer.

We also collect publicly available information on public platforms, including our own website.



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HOW DO WE USE PERSONAL INFORMATION?

We may use personal information in any of the following ways:

- To provide our services and for the conduct of our activities, including to carry out our obligations under any agreement between you and us.
- To facilitate the use of our websites and to ensure that the content is relevant and to ensure that the content of our websites is presented in the most effective manner for you.
- For marketing and business development purposes – to provide details of our activities, and information on developments in our organization and industry, and in connection with invitations to seminars and events.
- For research and development purposes – to carry out analyses to help us better understand the evolution of the environments in which we operate.
- For recruitment purposes – to enable us to process job applications and assess whether an individual meets the requirements of a position for which he or she could apply to CECI.
- To meet our legal, regulatory or risk management obligations.
- To prevent fraud and/or conduct other background checks that may be required at any time by applicable law, regulation and/or best practices (if false or inaccurate information is provided or fraud is detected or suspected, information may be forwarded to fraud prevention organizations and may be recorded by us or such organizations). When processing special categories of personal information, we may also rely on important public interests (crime prevention or detection) or legally founded claims.
- To enforce our rights, to meet our legal or regulatory reporting obligations, or to protect the rights of third parties.
- To ensure we get paid – to collect payments owed to us and, where appropriate, to enforce such collections through debt collection agencies or other legal means (including legal proceedings).
- In order to reorganize or change our organization – if we undertake a reorganization, we may need to transfer some or all personal information to a third party (or its advisors) as part of any due diligence process for the same purposes as set out in this policy or for the purposes of analyzing any proposed reorganization.



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WITH WHOM DO WE SHARE PERSONAL INFORMATION?

CECI is a non-profit organization, duly incorporated and recognized as a charitable organization. Consequently, the personal information we collect may be transmitted to and processed by any entity in the CECI network. We may also share personal information with certain third parties, including:

- third-party service providers and/or partners, including those who provide us with donation solicitation, database analysis, website, application development, hosting, maintenance and other services. These third parties may access or process personal information in connection with the services they provide to us. We limit the information we provide to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with these service providers require them to maintain the confidentiality of such information;
- CECI volunteers or suppliers for the purposes of recruiting human resources, volunteers or soliciting financial contributions;
- government authorities and law enforcement agencies when required by applicable law. Specifically, we may disclose personal and other information if we are required to do so by tax or other laws, or if we believe in good faith that such disclosure is necessary to comply with applicable laws, in response to a court order or government subpoena or search warrant, or otherwise to cooperate with such government authorities and law enforcement agencies;
- We will use personal information only to fulfill the primary and legitimate purpose for which it was collected, or for purposes consistent with that primary purpose.

CECI uses the services of third-party websites, such as Google and Facebook, to promote its content and offers.

When you visit our website, these third parties may use cookies, web beacons or similar technologies on your hard drive to collect or receive information about your browsing on the website and elsewhere on the Internet. These technologies enable them to deliver relevant, targeted advertising based on your areas of interest. You can consult cookies and delete them if you wish. Please refer to your browser settings to make the appropriate changes.

For more information, please consult our Cookies Policy (see page 8).



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HOW LONG DO WE KEEP PERSONAL INFORMATION?

We will retain personal information only as long as necessary for the purposes set out in this policy and to comply with our legal and regulatory obligations.

To find out more about how long we keep personal information, please contact us as set forth in the "How to contact us" section.

WHERE DO WE STORE PERSONAL INFORMATION AND TRANSFERS OUTSIDE QUEBEC?

CECI has chosen to use cloud-based applications (SaaS) in its approach to data storage. Third-party service providers are responsible for managing data storage and security.

CECI ensures that all its suppliers comply with best practices in data security. This compliance is regularly assessed by means of annually updated compliance reports, including SOC I & II and ISO certifications.

To guarantee the continuous availability of its services, data is generally replicated on several servers simultaneously. Although CECI favours cloud services hosted in Quebec, it is important to note that many services are not available in the province, and must therefore be managed in other Canadian provinces or in the United States.

With regard to data access, CECI adheres strictly to its privacy policies. In addition, annual audits of its IT services are carried out by independent third-party firms to ensure that they are secure and in line with current best practices.



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HOW DO WE PROTECT PERSONAL INFORMATION?

We follow generally accepted industry standards to protect the information submitted to us, both at the time of transmission and once we have received it. We maintain appropriate physical, technical or administrative safeguards to protect personal information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, misuse or other unlawful forms of processing of personal information in our possession. We have taken steps to ensure that the only employees who have access to your personal information are those who have a need to know or whose duties reasonably require them to know it.

However, no method of transmission over the Internet, nor any means of electronic storage, is 100% secure. We therefore cannot guarantee the security of any information you transmit or provide to us, and you do so at your own risk. Nor can we guarantee that such information will not be accessed, obtained, disclosed, altered or destroyed as a result of a breach of our physical, technical or administrative safeguards. If you have reason to believe that personal information has been compromised, please contact us. In the event of a privacy incident involving your personal information, we will notify you as soon as possible after we become aware of the incident. We will take reasonable steps to minimize the risk of harm and to prevent similar incidents in the future.



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WHAT RIGHTS DOES AN INDIVIDUAL HAVE IN REGARDS HIS OR HER PERSONAL INFORMATION?

Under certain circumstances and in accordance with applicable data protection laws, an individual has the following rights:

- Access: the right to ask whether we process personal information and, if so, to request access to it. Subject to applicable law and, where applicable, the payment of a monetary sum, the individual may thus receive a copy of the personal information we hold and certain other information concerning him or her.
- Accuracy: we are required to take reasonable steps to ensure that personal information in our possession is accurate, complete and not misleading.
- Rectification: the right to request rectification of any incomplete or inaccurate personal information held by us.
- De-indexing: the right to request that we cease disseminating personal information or de-index any hyperlink attached to their name giving access to information if such dissemination causes them prejudice or contravenes the law or a court order (**right to erasure or forgetting**).
- Anonymization: the fact that our organization may, instead of destroying it, anonymize personal information in order to use it, but only for serious and legitimate purposes (e.g., keeping information required for possible tax inspection purposes).
- The right to be informed when you are the subject of a decision based exclusively on automated processing.
- The right to be informed when identification, tracking or profiling technology is used and of the means available to activate these functions.

Finally, it is also possible to lodge a complaint with a data protection supervisory authority, more specifically in the country, province or state in which you normally reside (in Quebec, the Commission d'accès à l'information), in which we are located or in which an alleged breach of data protection laws has occurred.

To exercise any of these rights, please contact us as set out in the "How to contact us" section.

