

Early Childhood Observatory

Privacy policy

Preamble

The Early Childhood Observatory (the “**Observatory**”) recognizes the importance of ensuring individuals’ privacy and is committed to protecting the personal information it collects and processes in the course of its activities.

The Observatory is a project funded by the Lucie and André Chagnon Foundation. Accordingly, it applies the privacy policy of the Lucie and André Chagnon Foundation.

1. What is the purpose of this policy?

This privacy policy (the “**Policy**”) describes the policies and practices implemented by the Observatory to protect the personal information it collects in the course of its activities.¹

2. Definitions

Personal information: Any information concerning a natural person that allows them to be identified directly or indirectly (postal address, phone number, email address, bank account number, etc.).

Sensitive personal information: Personal information that entails a high reasonable expectation of privacy, namely due to the potential harm to the individual in the event of a breach of confidentiality (unauthorized disclosure of identification documents, financial information, medical information, biometric data, social insurance number, sexual orientation, etc.).

3. What personal information do we collect and for what purposes?

The Observatory only collects personal information that is necessary for the purposes of its activities. In addition to information relating to your identity (such as your name and email address), this includes information about digital interactions (cookies).

The Observatory collects, uses, and discloses your personal information for the purposes to which you have consented or as permitted by law. The purposes for which the Observatory collects your personal information are specified at the time of collection. You may also be informed of these purposes upon request. The purposes for which the Observatory collects your personal information include, but are not limited to, the following:

- Managing the Observatory’s website and newsletter subscriptions
- Managing and maintaining files and accounts created during a transaction and managing requests related to the Observatory’s products and services
- Conducting studies, surveys, analyses, targeting, and segmentation, as well as compiling statistics, particularly to understand and analyze subscribers’ interests, needs, and

¹The Policy does not apply to employees and other personnel of the Early Childhood Observatory who are covered by an internal policy.

preferences and to monitor product and service quality, conduct internal audits, or carry out continuous improvement activities

- Conducting subscriber surveys
- Communicating with the persons concerned, answering questions, comments, and requests, or handling complaints
- Confirming a person's identity, checking the accuracy of personal information, and updating it
- Protecting the website against cyberattacks and preventing, detecting, and controlling fraud and illegal activities such as money laundering or cyber threats
- Complying with legal and regulatory requirements

4. How is your personal information collected?

4.1 Directly from you

Most of the personal information we collect is information that you provide to us directly. This includes when you:

- Contact us in person, by phone, by email, or by other means
- Make specific requests to the Observatory
- Provide feedback or answer surveys

4.2 From third parties

The Observatory may collect your personal information from third parties with your consent or if authorized to do so by law.

4.3 Through the Observatory's website and online services

The Observatory may collect personal information when you visit its website.

Subject to applicable requirements regarding consent to collection via a technology service or solution, the IP address used by your device to connect to the internet is automatically collected when you access the Observatory's website.

The Observatory and some of its partner advertising networks may also use cookies to collect other information on the use of its website and mobile application. Among other things, cookies enable us to recognize users when they access the site and when they navigate from page to page. The Observatory and, where applicable, its partner advertising networks, use these cookies to identify people who show a particular interest in certain pages of the website, for the purposes of retargeting. Therefore, it may display specific ads, including banners, on other websites you visit.

5. Under what conditions may we collect, use, and disclose your personal information?

The Observatory collects, uses, and discloses your personal information on the condition of having obtained your consent in accordance with applicable requirements, or without your consent in certain circumstances provided for by law, such as in the case of criminal or penal proceedings.

If you no longer want the Observatory to use your personal information for secondary purposes, to generate personalized offers, or to make recommendations regarding its services, you may withdraw your consent at any time and the Observatory will respect your wishes.

With regard to primary purposes, such as the management and administration of our services, it is generally not possible to withdraw your consent for contractual or legal reasons, or without terminating your contract where this is permitted.

Requests to withdraw consent should be submitted to the Observatory's privacy officer, whose contact information is provided in section 11 below.

6. To whom is your personal information disclosed?

Your personal information is only accessible to staff members of the Observatory whose duties require them to have access to it.

The Observatory may also disclose your personal information to partners or service providers in connection with the performance of service contracts that fall within the scope of the purposes described above, or to public authorities by virtue of the law. There are several categories of third parties to whom we may disclose your personal information:

- Persons acting on your behalf with your consent
- Our service providers, including advertising agencies and providers of technology services and solutions
- Criminal and penal prosecution authorities, if we have personal information about an individual who has committed an offence and whose personal information is required to take legal action against them
- The Commission d'accès à l'information (the supervisory body in Quebec responsible for the protection of personal information) and all persons authorized to obtain such information by law, such as securities regulators, self-regulatory organizations, and the Financial Transactions and Reports Analysis Centre of Canada

7. How do we store your personal information and for how long?

The Observatory uses facilities and service providers that ensure your personal information is stored securely and kept confidential.

Your personal information is generally stored in Quebec. However, the disclosure of personal information to certain technology solution providers may result in the transfer of such information outside the province. In such cases, the Observatory will take the following measures:

- Perform the necessary privacy risk analysis
- Validate the privacy laws and practices applicable in the relevant jurisdiction in advance and ensure that your personal information is adequately protected
- Notify you no later than at the time your personal information is collected

The Observatory keeps your personal information only as long as needed for the purposes for which it was collected and for the applicable legal retention periods, which may sometimes result in longer retention periods. Destruction or, if warranted by a serious purpose, anonymization is carried out in a secure manner.

8. How do we ensure the protection and security of your personal information?

The Observatory applies security measures that are proportionate to the sensitivity of your personal information and that protect it against loss or theft and any unauthorized access, disclosure, copying, use, or modification, in accordance with applicable legislation. These security measures include:

- I. **Administrative measures**, such as regular monitoring of security threats to your personal information and the deployment of a privacy training and awareness program for all Observatory staff members, including regular mandatory training.
- II. **Physical measures**, such as restricting access to the Observatory's premises and protecting its IT equipment, systems, and internet networks with passwords or two-factor authentication.
- III. **Technical measures**, such as allowing access to your personal information strictly on a need-to-know basis—that is, limiting access only to those who need it to perform their duties, setting up alerts in the event of suspicious activity, and securely encrypting communications.

In addition, on signing their employment contracts, all Observatory personnel undertake to respect the confidential nature of the information to which they have access.

Although the Observatory uses multiple security measures to adequately protect your personal information and minimize the risk of a privacy breach, it is impossible to eliminate this risk entirely. We cannot guarantee that your personal information will not be compromised in the event of a breach of our administrative, physical, or technical security measures. If you have reason to believe that your personal information has been compromised, please contact our privacy officer using the information provided in section 11.

9. What are your rights regarding your personal information?

The Observatory respects your legal rights concerning your personal information and has procedures in place to accommodate the following requests:

- I. **Accessing and correcting your personal information:** You are entitled to access the personal information that the Observatory has collected about you, verify its accuracy, and request that it be amended, subject to exceptions provided by law. Requests for access or correction are free of charge. However, there may be a reasonable fee for the transcription, reproduction, or transmission of your personal information. Requests for access or correction should be sent to the Observatory's privacy officer, whose contact information is provided in section 11 below. They will be processed no later than thirty (30) days following the date of receipt.
- II. **Withdrawing your consent:** In certain circumstances, you may withdraw your consent to the processing of your personal information. Requests to withdraw consent must be communicated in writing to the Observatory's privacy officer (see section 11 below).
- III. **Portability:** Upon request, you may obtain a copy of the personal information that has been collected about you. Barring serious practical difficulties, if your personal information

has been computerized, you may request that it be communicated to you in a structured, commonly used technological format.

- IV. **Cessation of dissemination and de-indexation:** You may request that the Observatory cease to disseminate your personal information or de-index any hyperlink attached to your name that enables access to your personal information by technological means, provided the dissemination of the information causes you harm or contravenes the law or a court order.

10. What if I have a question or complaint about my personal information?

Any questions about your personal information or complaints regarding non-compliance with the principles set forth in the Policy should be forwarded to the Observatory's privacy officer (see section 11 11 below

11. Who is the person within the Observatory responsible for ensuring the protection of my personal information?

The privacy officer is responsible for ensuring the protection of your personal information.

Their contact information is as follows:

- **Mailing address:** 2001 McGill College Avenue, Suite 1000, Montreal, QC H3A 1G1
- **Email address:** renseignementspersonnels@fondationchagnon.org

12. Can the Policy be modified, and if so, will I be notified?

The Observatory may occasionally modify the content of the Policy. If applicable, the new version will be posted on the Observatory's website.