



# Privacy and Personal Information Protection Policy



## **Preamble**

This policy addresses the management and protection of information deemed confidential within Palliacco. It specifically deals with information concerning its members in good standing.

It applies to the conduct of all individuals, whether they are administrators, donors, staff members, volunteers, members, partners, or any other persons working or present at the various locations of Palliacco.

It aims to achieve the following objectives:

- To ensure the respect of individuals' privacy and the security of personal information held by Palliacco, both physically and electronically.
- To establish guidelines for the exchange of information both within and outside the organization.

Anyone who requests services from Palliacco agrees that their personal information may be collected, used, processed, and disclosed in accordance with the conditions described in this policy.

## **Context**

New provisions are coming into force to regulate the protection of personal information and privacy (Quebec Law 25). Palliacco wishes to update its privacy and personal information protection policy to protect the privacy and integrity of all who are associated with it.

Respect for privacy remains a fundamental priority for Palliacco.

## **Personal Information Protection Officer**

For any questions related to the protection of personal information, the requester must contact the Personal Information Protection Officer at the following coordinates:

Ms. Chantal Roy, Palliacco Executive Director  
2280, rue Labelle, Mont-Tremblant, QC, J8E 1T8  
Tél : 819-717-9646 | Toll-free : 1-855-717-9646  
Email : [direction@palliacco.org](mailto:direction@palliacco.org)

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## Definitions

**Personal Information:** Any information that concerns a physical person and allows them to be identified directly or indirectly.

**Confidentiality:** The act of limiting or prohibiting access to private information obtained in the course of Palliaccio's activities.

## Palliaccio's Commitments

Palliaccio commits to respecting the principles of:

**Consent:** Palliaccio commits to collecting personal information only if the person concerned gives permission via written or verbal consent (verbal for all clients who open a file by telephone).

**Responsibility:** Palliaccio assumes responsibility for the handling and use of information provided to it and commits to establishing and implementing methods to protect the confidentiality of such information.

**Transparency:** Palliaccio commits to acting with full transparency in managing personal information by informing all those involved of its policy, having individuals sign consent forms or by obtaining verbal consent for all clients who open a file by phone, and commits to notify concerned individuals in the event of a breach of their confidentiality.

In practice, Palliaccio commits to:

- Ensuring the security and confidentiality of information obtained,
- Putting mechanisms in place to protect confidential information,
- Ensuring the confidential handling of complaints,
- Collecting only necessary or useful information,
- Applying the privacy policy in accordance with its values.

## Standards for Discretion

Anyone within Palliaccio who engages in communications unrelated to their duties must act with discretion. Therefore, they must:

- Respect the private lives of individuals,
- Not disclose confidential information obtained through the organisation,
- Know how to protect the sensitive information of those who confide in them,
- Act according to the values of the organisation.

## Standards for Confidentiality

Anyone in Palliaccio's team who obtains confidential information in the course of their duties is required to respect the confidentiality of this information. Exceptions are made in certain cases where it is essential for employees to share certain information in order to provide better service. In such cases, the individuals concerned must also maintain the confidentiality of the shared information.

## **Standards for Information Exchange and Record Keeping**

### **Exchanging Information Outside Palliacco**

Members of the Board of Directors, management, volunteers, and employees are prohibited from discussing files, identities of individuals, or decisions made by Palliacco with external persons or with persons unrelated to the activities of Palliacco. If this prohibition is not possible to observe in individual cases, the person concerned must not be identified, and any exchange of confidential information must take place in a location and manner that protect confidentiality. Under such exceptional circumstances, if telephone conversations are required, it must be assured that no information can be overheard by others.

### **Exchanging Information Within Palliacco**

Palliacco commits to:

- Limiting information exchange among employees to team meetings and to conducting such meetings only in a secure location (e.g., in a private office with the door closed),
- Avoiding discussing files, individuals, or decisions other than during such times. If these measures are impossible, to ensure that the person concerned is not identified and to exchange information only in a location conducive to protecting confidentiality,
- Ensuring that telephone conversations involving confidential information are not overheard by others.

## **Procedures for Maintaining Records**

Palliacco commits to:

- Recording only true, relevant, and necessary information in clients' files,
- Avoiding personal comments, reflections, or perceptions and adhering to facts reported by the person concerned or directly observed by the worker.

## **Security Measures to Limit Access to Confidential Information**

### **In offices**

- Close office doors during lunchtimes, at the end of the day, and when the occupant is absent,
- Keep files closed and in a secure location in accordance with Palliacco's standards.

### **Filing Cabinets**

- Secure filing cabinets containing clients' and employees' files, as well as files containing personal information, outside of office hours or in the absence of the person or persons responsible.

### **Computers and Other Information Storage Modalities**

- Lock computer screens during lunchtimes and in case of absence,
- Change passwords as needed (computer server, work station, voicemail, etc.),
- Ensure the security of the computer and network,
- Ensure the security of the website,
- Ensure contingency plans: report confidentiality breaches to the Commission d'accès à l'information du Québec.

## Procedures for Retention of Confidential Files

Palliacco is committed to respecting the right to anonymity of individuals who are directly or indirectly connected with it. Accordingly, anyone asking about their right to be forgotten and who request such can have all their personal information deleted from Palliacco's physical and electronic records.

Additionally, Palliacco commits to:

- Identifying an expiration date (retention period) for personal information that may become unnecessary over time.

### Retention Period

The retention period for each of the categories listed below is established as follows:

- Employees and contractors:
  - 7 years after the end of employment,
  - Exception: files of employees who have been subject to any claims must be kept for life.
- Board members:
  - 7 years after the end of their mandate,
  - Exception: meeting minutes in which their names are recorded must be kept for life.
- Volunteers: 7 years after the end of their term of volunteering,
- Donors: 7 years after their last donation,
- Clients: 10 years after the end of the last service provided to them.

### Destruction of Confidential Files

- Ensure that closed files are shredded by a team member or board member at the end of the retention period,
- Ensure that digital personal information is completely deleted from all devices, servers, and cloud storage.

## Individual Rights

### Right of Access

Anyone whose personal information is held by Palliacco has the right to request access to it within a reasonable time and in the form in which the information was collected.

**Anonymity** - Anyone who requests it can avail themselves of their right to be forgotten and have all their personal information deleted from Palliacco's physical and electronic records.

## **Implementation**

Palliacco's management is responsible for implementing and applying the privacy policy. Upon commencing their work with Palliacco, administrators, management, employees, and volunteers must sign an agreement to respect this policy. In case of non-compliance with the privacy policy by management, the board of directors must intervene. If an administrator, employee, or volunteer discloses confidential information, the applicable authority must impose a sanction in accordance with Palliacco's policies and regulations. The sanction can range from a reprimand to termination.

## **Complaint Process**

Palliacco commits to appointing a person responsible for all questions related to confidentiality and personal information protection. The name of this person will be posted on the organization's website. Any complaints must be addressed to Ms. Chantal Roy, Executive Director, and will be handled according to the prescribed procedure.

## **Effective Date**

This policy comes into effect on July 18, 2025, following its adoption by the Board of Directors. It may be revised after an appropriate period of analysis. Any revisions must conform to Palliacco's values and regulations.