



Comité d'action des locataires
de l'Ouest-de-l'Île

Personal information protection policy and confidentiality policy 2024

The **West Island Tenants Action Committee (CALODI)** is a non-profit legal entity which works with personal information as part of its associative and democratic organizational activities and its legal information service. The following policy aims to ensure the protection of the personal information of people using CALODI's services or participating in its activities. This policy governs the way in which the organization collects, uses, communicates, stores and destroys the personal information transmitted to it. This policy also addresses how CALODI collects personal information by technological means.

1. Scope and definitions

This policy applies to CALODI employees, as well as the organization's interns and administrators of the organization. The policy covers all personal information collected in the course of providing CALODI services. In this policy, personal information is defined as information which concerns a natural person and which allows, directly or indirectly, to identify them such as the name, telephone number, address, name of the owner of their accommodation or email address.

2. Collection, use and communication of personal information

As part of its activities, CALODI must collect personal information, essential for its associative and democratic life activities and for its monitoring of tenant service files. This information is compiled in the form of statistics in our activity report for reporting purposes to our various donors. As part of its legal information service, the information collected makes it possible to help draft a formal notice, to identify buildings where collective action could be possible and to target the most present problems in the neighbourhood. They may be shared with partners with the consent of the person concerned.

CALODI only collects the information necessary for the provision of services or participation in the organization's activities. In its collection, use and communication of personal information, CALODI applies the following principles:

Consent : Generally, CALODI collects personal information directly from the person concerned, sometimes with the help of a relative or an interpreter if necessary. This data

collection is done with the person who requires the organization's services. This information is obtained with the consent, either written or implied, of the person, unless an exception is provided by law. CALODI must also obtain the consent of the person concerned before collecting their personal information from third parties, before communicating it to third parties or for any secondary use thereof. A written power of attorney is necessary for us to contact any public or parapublic organization on your behalf, for example the Permits and Inspection Division of a city in the West Island, the City of Montreal, an Office municipale d'habitation, a CIUSSS, etc.

Collection : All information requested from people requiring our services is requested because there is a valid reason to do so. CALODI does not collect information that is not necessary for the provision of service, unless it is used for static purposes, in which case, individuals are informed. Information collected from a third party, when it comes to government authorities, is always done with the signing of a power of attorney signifying consent. Verbal consent is used when CALODI must contact another organization or person. Communication by CALODI with a third party for data collection is always made as a necessity for the provision of the service.

Possession and use: CALODI ensures that the information it holds is up-to-date and accurate when it is used to make a decision relating to the person concerned. CALODI only uses personal information for the reasons stipulated when signing the power of attorney. Personal information is only used for the provision of services requested by the individual. A new power of attorney must be signed when a new request for the provision of services is requested or if the provision of the service concerns a new service period. As soon as the organization wishes to use this information for another reason, new consent must be obtained from the person concerned. When CALODI wishes to use personal information for statistical purposes, analyses, open letters or any other public communication, the information will be anonymized beforehand. Access to personal information is limited to CALODI permanent staff, interns and contract workers under the supervision of the work team, all subject to the code of ethics and this policy.

Communication : Generally, and unless an exception indicated in this policy or otherwise provided for by law, CALODI will obtain the consent of the person concerned before communicating their personal information to a third party, by written power of attorney or verbal consent.

Additional information on the technologies used : A web form to become a member of CALODI is integrated into our website. This information is compiled in the same way as other information mentioned in this policy.

When you visit our website (calodi.info), we collect anonymized statistical data using Google Analytics (such as your location and the pages you visited). We use this information for statistical purposes, to better understand the needs and interests of our website users. Using cookies, Google Analytics collects information about your activities on our site, in addition to the path taken to get there. This data is collected by Google in the United States. All data collected by Google Analytics is generally anonymized.

When you subscribe to our newsletter, Mailchimp also collects your email address. If you wish to unsubscribe from the CALODI newsletter, the organization will delete your data from our Mailchimp lists within six (6) months following your unsubscription.

3. Retention and destruction of personal information

CALODI documents are kept in a locked office at all times, except when one or more employees are present. Computers and online work tools are locked by a personal password for each employee. All employee and intern files are kept indefinitely for future reference purposes, but will be destroyed at the verbal or written request of the employee in question. Any paper document containing personal data of people attending CALODI or using its services (call return forms, draft notices, telephone call lists, forms, etc.) are systematically shredded after use.

4. Responsibilities of CALODI

Generally speaking, the organization is responsible for protecting the personal information it holds. The person responsible for the protection of personal information at CALODI is designated for this purpose by the work team. The responsible person must ensure compliance with applicable legislation, policy and modify practices as necessary. They keep the complaint registry up to date.

The person responsible for the protection of personal information at CALODI is Ryan Simonyik.

In the event of the absence or inability to act of the person responsible, the work team and the board of directors will designate a person who will carry out the functions of the person responsible for the protection of personal information. All employees and interns having access to personal information or being otherwise involved in its management must ensure its protection and respect this policy.

5. Data security

CALODI undertakes to put in place reasonable security measures to ensure the protection of the personal information contained in its files.

6. Rights of access, rectification and withdrawal of consent

To withdraw consent, request access or request rectification, the person concerned must contact the person responsible for the protection of personal information by email using the contact details found in the following section.

7. Complaint handling process

Reception To file a complaint regarding the application of this policy, individuals must file a complaint by contacting the person responsible for the protection of personal information.

For any request, question, complaint or comment in the context of this policy, please contact the person responsible for the protection of personal information at CALODI, by email, at the following contact details:

Ryan Simonyik; rsimonyik@calodi.info

The following information is required in the complaint:

- Name
- Contact details (telephone number and/or email)
- Object
- Reason for complaint

Complaints are handled confidentially within 30 days. It is also possible to file a complaint with the Commission d'accès à l'information du Québec or any other supervisory body regarding the protection of personal information responsible for the application of the law concerned by the subject of the complaint.

8. Approbation

This policy is approved by the board of directors of the West Island Tenants Action Committee (CALODI).

9. Publication et modifications

As prescribed by the [law modernizing legislative provisions regarding the protection of personal information in the private sector, also called the Law 25](#). This policy is published on the CALODI website. This policy is also available for consultation on the organization's premises.

10. Privacy and/or security incident

A confidentiality incident occurs when access, use or disclosure of personal information is not authorized by law, loss of personal information or any form of breach of data protection. 'personal information. A security incident occurs when offices or computer systems are penetrated by unauthorized individuals.

CALODI undertakes to follow the following obligations in the event of an incident:

- Keep a record of confidentiality incidents;
- Take reasonable measures to reduce the risk of harm being caused;
- Notify the person concerned and the Commission for Access to Information if the incident presents a risk of serious harm.

11. Privacy Impact Assessment

CALODI is committed to making a [Privacy Impact Assessment](#) according to the guide provided by the Quebec Information Access Commission in the following situations:

- A project or initiative involving personal information
- A project likely to have an impact on respect for the privacy of individuals