

Privacy Policy

Effective date: 26-11-2024.

Date of last update: 26-11-2024.

1. General information

a) Introduction

Purpose of this Policy. The protection of privacy is important to Salesian Sisters (hereinafter the "Organization", "We", "Us", "Our"). For this reason, We have implemented safeguards and practices to manage Your Personal Information in accordance with applicable laws in Quebec and Canada.

Supplement to Terms and Conditions. This privacy policy (the "Policy"), which should be read in conjunction with Our Terms and Conditions, describes Our practices with respect to the collection, use, processing, disclosure, retention and destruction of Personal Information of persons benefiting from Our Services, visitors to this Website and its users (hereinafter "You", "Your").

Consent. By using Our Website <https://salesiansisterscanada.com/> (the "Website") or any of Our Services, You agree that We may collect, use, disclose, communicate, disclose and retain (hereinafter "Process" or "Processing") Your Personal Information in accordance with the terms described herein. If You do not agree to abide by and be bound by this Policy, You may not visit, access or use Our Website or Services, or share Your Personal Information with Us.

Policy limitations. This Policy does not apply to Personal Information of the Organization's employees, representatives and consultants, or any other person affiliated with the Organization, or to any information that does not constitute Personal Information as defined by applicable laws in Quebec and Canada.

b) Privacy Officer

Contact information for the Privacy Officer. All comments, questions and complaints regarding the Organization's Privacy Policy and practices may be addressed to Our Privacy Officer at the following coordinates:

Phone : (514) 351-6233

Email : privacyca@salesiansisters.org

Address : 9299 Pierre-De Coubertin Av, Montréal QC H1L2H6

2. Definitions

Definitions of certain notions and expressions. The following notions and expressions, when they appear with a capitalized first letter in the Policy, have the meaning attributed to them hereinafter, unless otherwise implied or explicit in the text:

"Organization", "We", "Us", "Our": The Salesian Sisters

"Service Provider" means any individual or entity that processes Personal Information on behalf of the Organization. This includes third-party companies or individuals employed by the Organization to facilitate the Services, to provide the Services on behalf of the Organization, to perform services related to the Services or to assist the Organization in analyzing the use of the Services.

"Personal information" means any information that relates to a natural person and allows that person to be identified, i.e., that directly or indirectly reveals something about the identity, characteristics (e.g., abilities, preferences, psychological tendencies, predispositions, mental abilities, character and behavior of the person concerned) or activities of that person, regardless of the nature of the medium or the form in which the information is accessible (written, graphic, sound, visual, computerized or other).

"Privacy Officer": the person responsible for the application of this Policy and whose contact information is identified in section Error! Reference source not found.**Policy limitations. This Policy** does not apply to Personal Information of the Organization's employees, representatives and consultants, or any other person affiliated with the Organization, or to any information that does not constitute Personal Information as defined by applicable laws in Quebec and Canada.

b) of this Policy.

"Services": Services refers to the applications of the Website, Our pages on social networks and all programs and services rendered to You therein such as:

- Provide you with information about our activities;
- Allow you to apply for a vocational discernment experience;
- Offer you various services in spiritual direction;
- Send you newsletters; and
- Ask you to participate to occasional surveys.

"Website": This website, i.e. <https://salesiansisterscanada.com/>.

"Process", "Treatment": This term covers all operations that may affect or concern personal information, including: collection, use, storage, destruction, communication or transmission.

"You", "Your", "Vos": The persons benefiting from Our Services, the visitors to the Website and all users having recourse to the Organization's Services.

3. Personal Data Processing

3.1 Collection of Personal Information

3.1.1 Collection methods

Various means. We collect Your Personal Information through Our Website or other technological means in a variety of ways:

- **Automatically.** When You connect to Our Website, the device You use to connect will send Us Personal Information ;
- **Electronic Forms.** By completing and sending Us one of Our electronic forms;

- **E-mails.** By sending Us e-mails using one of the e-mail addresses available on Our Website;
- **Surveillance cameras.** By surveillance cameras installed on Our property to protect the Sisters and the property

3.1.2 Personal information collected

Categories of information collected. In the course of Our activities, We may collect and process various types of Personal Information, including the information listed below:

- **identifying information and Your contact details**, including Your first and last name, postal address, e-mail address and telephone number;
- **demographic information**, such as Your age or place of residence;
- **technical or numerical information**, including connection information and other information about Your activities on the Website, such as Your IP address, the pages You consulted, the time and date of Your visits, Your number of connections, Your domain name, the address of the referring site (if You access the Website from another site), the type of browser You use, the operating system of Your device and other hardware and software information;
- **information that You choose to provide or transmit to Us**, for example, when You fill out an online form;

Limiting processing to necessary and legitimate purposes. In each case, Personal Information is processed in accordance with the legitimate and necessary purposes listed in section 3.3 - Error! Reference source not found. **Information** below.

3.2 How to refuse optional collection

Withholding consent. Unless the Law or Your contractual obligations provide otherwise, You may refuse or withdraw Your consent to certain specific uses or disclosures of Your Personal Information:

- by not entering Your Personal Information in Our electronic or paper forms when the provision of such information is indicated as being optional;
- by sending a request to Our Privacy Officer at the coordinates identified in section 1b) of this policy.

Measures offered to refuse means of collecting Personal Information. You may also provide Us with Your Personal Information by means other than through technological means such as Our Website. You may provide Us with the following:

- By e-mail;
- By phone; or
- In person.

3.3 Use of Personal Information

Purposes of Personal Information. We may use Your Personal Information for the purposes described below:

- To operate, maintain, supervise, develop, improve and provide the functionality of Our Website;
- Introduce You to and provide Our Services as described in section **2 - Definitions**;
- Perform Our contractual obligations towards You;
- Handle and resolve complaints and dissatisfactions;
- To develop, improve and offer new Services;
- To send newsletters, if You have previously consented to the processing of Your Personal Information for these purposes;
- To answer Your questions and provide You with assistance if required;
- To carry out research, analysis and statistics relating to Our Organization and Our Services;
- To detect and prevent fraud, error, spam, abuse, security incidents and other harmful activities;
or
- For any other purpose imposed or permitted by applicable law.

3.4 Access, disclosure and transfer of Personal Information

Access and Disclosure. We may transfer, disclose or provide access to Your Personal Information to Our employees and Service Providers who need to know that information in order to operate Our Website, perform Our Services, conduct Our business or serve You.

3.4.1 Access to Personal Information within the Organization

Limiting access to Personal Information. Your Personal Information is only accessible to Our directors, employees or representatives who require access to Your Personal Information in order to perform their duties. As such, Your Information may be accessible to:

- Our Privacy Officer;
- Our IT Services (“Information Technology”); and to
- Our Vocations Director (if You have applied for a vocational discernment experience).

3.4.2 Disclosure of Personal Information

Safeguards for disclosure to third parties. We will only disclose Your Personal Information to Our Service Providers if they have previously agreed in writing to maintain the confidentiality of Your Personal Information in accordance with applicable laws and Our Information Governance Program through the implementation of various safeguards and information governance measures. These measures are

proportionate to the sensitivity of the Personal Information processed or communicated. Without limitation, Our Service Providers may only use Your Personal Information in a confidential manner in accordance with Our instructions and only for the purposes for which it was provided. Furthermore, We only provide Our Service Providers with the Personal Information that is necessary for the performance of their mandate or contract, and We require such Service Providers to destroy the Personal Information in an appropriate manner upon termination of the contract or as soon as its use is no longer necessary.

Our Service Providers. Although We try to avoid sharing Your Personal Information with third parties, We may use Service Providers to perform various services on Our behalf, such as IT management and security, marketing, and data analysis, hosting and storage. We have defined below certain cases in which such sharing may take place:

- We use **YouTube** to present Our Services and activities. For more information, please consult Google's [privacy policy](#) ;
- We use **Google** services (such as Gmail) to store Our documents and e-mails. For more information, please consult Google's [privacy policy](#);

All categories of Personal Information identified in section **3.1 - Collection of Personal Information** may be communicated or stored through this service.

- We use **Bluehost** services to store Our documents and e-mails. For more information, see use Bluehost privacy policy;

All categories of Personal Information identified in section **3.1 - Collection of Personal Information** may be communicated or stored through this service.

- We use **Meta** social media to share our activities and inform the public about our Organization. If you visit our Facebook or Instagram pages or account, [Meta Privacy policy](#) will apply.
- We use **Metatracer** to facilitate the detection and management of Your Personal Information and that of Our employees, all to ensure Our compliance with privacy laws.

3.4.3 Communications outside Quebec

Disclosure of Personal Information Outside Quebec. We may communicate Your Personal Information outside of Quebec and mandate an entity located outside of Quebec to collect, use or retain Your Personal Information on Our behalf.

3.4.4 Compliance with legislation, responding to legal requests, preventing harm and protecting Our rights

Specific disclosures of Your Personal Information. We may disclose Your Personal Information when We believe that such disclosure is authorized, necessary or appropriate, including:

- to respond to requests from public and governmental authorities, including public and governmental authorities outside Your country of residence;
- to protect our activities and Organization;

- to comply with legal proceedings;
- to protect Our rights, the privacy of Our employees, officers and directors, Our security and Our property;
- to protect Your privacy and Your rights, or the privacy and rights of third parties;
- to enable Us to pursue available remedies or limit the damages We may suffer; and
- when it is compliant or mandatory according to applicable laws, including laws outside Your country of residence.

3.5 Consent

Consent for Collection, Use or Disclosure of Personal Information. Unless otherwise required by law, the Organization obtains Your consent to the collection, use and disclosure of its Personal Information. However, if You provide Us with Personal Information about other persons, You must ensure that You have duly notified them that You are providing Us with their information in addition to obtaining their consent to such disclosure.

Consent requirements. We will seek Your manifest, free, informed and purposeful consent before using or disclosing Your Personal Information for purposes other than those set out herein. We will also seek Your express consent whenever sensitive Personal Information is involved in any of the Organization's processing activities. We will ask for Your consent for each specific purpose in clear and simple terms, separate from any other information provided to You.

BY USING OUR WEBSITES, TRANSMITTING YOUR PERSONAL INFORMATION BY E-MAIL OR USING AN ONLINE FORM, YOU CONSENT TO THIS PRIVACY POLICY AND TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE PRIVACY POLICY.

Refusal to use the Web Site. If You do not consent, please discontinue using the Web Sites. Except where otherwise provided by law, You may withdraw Your consent at any time upon reasonable notice. Please note that if You choose to withdraw Your consent to the collection, use or disclosure of Your Personal Information, certain features of Our Website may no longer be available to You or We may no longer be able to offer You some of Our services.

3.6 Retention of Personal Information

Retention of Personal Information. Subject to applicable law, We retain Your Personal Information only for as long as is necessary to fulfill the purposes for which it was collected, unless You consent to Your Personal Information being used or processed for another purpose.

Additional information. To obtain more information about the periods during which Your Personal Information is kept, please contact Our Privacy Officer using the contact details provided in section Error! Reference source not found.**b) - Privacy Officer** of this Policy.

4. Your rights

List of rights. You may exercise the rights set out below by contacting Our Privacy Officer in writing at the contact information provided in Article Error! Reference source not found.**b) - Privacy Officer** of the Policy. Please note that We may ask You to verify Your identity before responding to any of these requests.

- You have the right to be informed of the Personal Information We hold about You, its use, disclosure, retention and destruction, subject to exceptions provided by applicable law;
- You have the right to access Your Personal Information, to request a copy of the documents containing Your Personal Information, subject to the exceptions provided by applicable law, and to obtain, if applicable, additional details on how We use, communicate, store and destroy it by communicating a written request to Our Privacy Officer at the coordinates identified in section Error! Reference source not found.**b) - Privacy Officer** for this Policy;
- You have the right to have the Personal Information We hold about You rectified, amended and updated if it is incomplete, equivocal, out of date or inaccurate by sending a written request to Our Privacy Officer at the contact information identified in section Error! Reference source not found.**b) - Privacy Officer** for this Policy ;
- You have the right to withdraw or modify Your consent to the collection, use and communication of certain of Your Personal Information collected (as identified in section **3.1 - Collection of Personal Information** of this Policy) at any time, subject to applicable legal and contractual restrictions;
- You have the right to ask Us to stop disseminating Your Personal Information and to de-index any link attached to Your name which gives access to this information if such dissemination contravenes the law or a court order;
- You have the right to request that Your Personal Information be communicated to You or transferred to another organization in a structured and commonly used technological format;
- The right to be informed of any privacy incident concerning Your Personal Information that could cause You serious harm. To this end, we maintain a register of all privacy incidents and assess the harm they may cause; and
- You have the right to file a complaint with the *Commission d'accès à l'information*, subject to the conditions set out in the applicable law.

5. Questions and complaints

Complaint Process. You may address any complaints regarding Our practices and policies for the protection of Your Personal Information by contacting Our Privacy Officer using the contact information identified in section Error! Reference source not found.**b) - Privacy Officer**.

Questions. You may also contact Our Privacy Officer with any questions regarding this Privacy Policy using the contact information identified in section Error! Reference source not found.**b) - Privacy Officer**.

Necessity to identify You. In order to process Your request, You may be asked to provide an appropriate identification document or to identify Yourself in some other way.

6. Safety measures

Objectives of Our Security Measures. We have implemented physical, technological and organizational security measures to adequately protect the confidentiality and security of Your Personal Information against loss, theft or any unauthorized access, infringement, disclosure, reproduction, communication, use or modification. These measures include :

- **Administrative measures.** On the administrative front, the adoption of a series of measures, policies and procedures as part of the implementation of our Information Governance program, including :
 - govern the access, disclosure, retention, de-identification, destruction or anonymization of Personal Information;
 - determine the roles and responsibilities of Our employees throughout the life cycle of Personal Information and documents;
 - establish procedures for intervention and response in the event of a confidentiality incident;
 - govern the process for requests and complaints relating to the protection and handling of Personal Information.
- **Technical measures.** On a technical level, the use of several means such as:
 - Use of Secure Socket Layer (SSL) technology; and
 - The use of a firewall system.

Incomplete list of measures. Given the public nature of this Policy, we have not provided an exhaustive list of the measures we are implementing.

Impossibility of guaranteeing a complete absence of risk. Despite the measures described above, We cannot guarantee the absolute security of Your Personal Information. If You have reason to believe that Your Personal Information is no longer secure, please contact Our Privacy Officer immediately using the contact details set out in section **1b) - Privacy Officer** above.

7. Changes to this Privacy Policy

Right to change this Policy. We reserve the right to modify this Policy at any time in accordance with applicable law. In the event of a change, We will post the revised version of the Privacy Policy and update the update date in the footer of the Privacy Policy. We will notify You prior to the effective date of the new version of Our Policy. If You do not agree to the new terms of the Privacy Policy, please do not continue to use Our Website and Services. If You continue to use Our Web Site or Services after the new version of Our Policy becomes effective, Your use of Our Web Site and Services will be governed by the new version of the Policy.

8. Links to third-party websites

Responsibility for Third Party Websites. From time to time, We may include on Our Website references or links to websites, products or services provided by third parties ("**Third Party Services**"). These Third-

Party Services, which are not operated or controlled by the Organization, are governed by privacy policies that are entirely separate from and independent of ours. We therefore assume no responsibility for the content and activities of these sites. This Policy applies only to the Website and the Services we offer.

9. ReCAPTCHA

What reCAPTCHA does. Google's reCAPTCHA analyzes activity on a web page function (e.g. mouse movements and typing patterns) to determine whether a user is a robot. The invisible reCAPTCHA service may collect information from Your device. Information collected by reCAPTCHA is stored in accordance with its privacy policy.

10. Individuals under 14 years of age

Consent of minors under the age of 14. If You are under the age of 14, You must not provide Us with Your Personal Information without the consent of Your parent or guardian. If You are a parent or guardian and You become aware that Your child has provided Us with Personal Information without consent, please contact Us using the contact details set out in section **1b)** above to request that We delete that child's Personal Information from Our systems.

11. Applicable laws

Laws of Quebec and Canada. The laws of Canada and Quebec, excluding its conflict of law rules, will govern this agreement and Your use of the Website. Your use of the Website may also be subject to other local, provincial, national or international laws.