



Privacy Policy

Vision Gaspé-Percé Now

In accordance with the Act Respecting the Protection of Personal Information in the Private Sector (Law 25)

Effective Date: October 14, 2025

Last Updated: October 14, 2025

1. Introduction

At Vision Gaspé-Percé Now (VGPN), we value the trust individuals place in us when they share their personal information. This policy explains how we handle personal information in accordance with Quebec's Act Respecting the Protection of Personal Information in the Private Sector (Law 25).

2. Purpose

Our goal is to ensure transparency and accountability in how we collect, use, store, share, and protect personal information. This policy supports our commitment to respecting the privacy rights of every individual who interacts with our programs, services, and online platforms.

3. Definitions

Personal Information: Under Law 25, personal information refers to any information that relates to a natural person and allows that person to be identified, directly or indirectly. This includes information that, when combined with other data, could identify someone.

Types of personal information can include, but are not limited to, the following:

- *Identity and Contact Information:* Full name, date of birth or age, address, email address, phone number, language preference, gender
- *Health and Support Information:* Health conditions, mobility or accessibility needs, dietary restrictions
- *Program and Service Participation:* Registration or attendance records, program interests or feedback, emergency contact information
- *Employment or Volunteer Information:* Résumés or job applications, references or background checks, Social Insurance Numbers, banking details, training records
- *Communications and Publicity:* Photos or videos, testimonials or stories, written correspondence (emails, notes, survey responses)
- *Online and Technical Information:* Information collected via online forms, IP address, website usage data (basic analytics, if identifiable), consent checkboxes and form submission details

- *Legal and Financial Information:* Income status, legal documents (e.g., service agreements, biometric or sensitive data - if ever applicable)

Sensitive Personal Information: This is private information that needs extra protection. It includes things like health details, biometric data (identify based on body such as fingerprints, facial recognition etc.) or financial information. We must get your clear permission (explicit consent) before collecting or using this type of information.

Individual: A person whose information is handled by VGPN.

Consent: Voluntary and informed agreement to collect and use personal information for defined purposes.

Privacy Officer: The designated staff member responsible for privacy oversight and compliance.

4. What We Collect and Why

Vision Gaspé-Percé Now collects personal information to support program delivery, manage operations, and meet legal or funder requirements. Information is collected from individuals who engage with the organization in various ways, including program participants, job applicants, employees, volunteers, board members, website users, and members of the public who contact us. The type of information collected depends on the individual's relationship with VGPN and may include, for example, names, contact details, or participation history. In line with Law 25, we only collect what is necessary for clearly defined purposes and inform individuals at the time of collection. For a detailed overview of the types of personal information we may collect, the reasons for collection, and how long we retain it, please refer to **Appendix A**. Information is collected securely whether in person, by phone or email, through online forms, or via the VGPN website.

5. Consent and Choice

We obtain consent before collecting, using, or sharing personal information unless permitted by the law. Consent must be:

- Clear and informed, and presented separately
- Specific to each purpose

- Explicit for sensitive personal information

You can withdraw your consent at any time by contacting our Privacy Officer.

6. How We Use and Share Information

VGPN uses personal information only for the purposes stated at the time of collection or for other purposes that align with those original intentions. We do not sell personal information under any circumstances.

Personal information may be shared with:

- Staff members or authorized volunteers, strictly for work-related responsibilities
- Trusted service providers or funding partners, subject to confidentiality agreements
- Legal or regulatory authorities, when disclosure is required by law

7. How Information is Stored and Protected

We use a combination of digital and physical safeguards to protect the personal information in our care:

- Password-protected systems and encrypted servers
- Locked filing cabinets for paper records
- Limited access for authorized personnel only

In accordance with Quebec's Law 25, when we offer technological tools or digital platforms that include privacy settings, these settings are configured by default to provide the highest level of confidentiality, without requiring any action from the user.

Retention periods vary by type of data and are detailed in Appendix A.

8. Your Rights

You have the right to:

- Ask what personal information we have about you
- Request corrections to inaccurate or outdated information
- Be informed of how your information has been shared or used

To submit a request, contact the Privacy Officer.

9. Online Forms and Website Use

Our online forms are secure and used for registrations, surveys, and other communications. Our website may track basic analytics to improve user experience, but we do not use invasive tracking or targeted advertising tools.

10. Role of the Privacy Officer

The Privacy Officer ensures our organization follows privacy rules by:

- Conducting privacy impact assessments
- Managing access and correction requests
- Overseeing staff awareness and training
- Maintaining a log of privacy-related incidents

11. Privacy Impact Assessments

The Privacy Officer will conduct a Privacy Impact Assessment:

- Before using a new tool that collects personal information
- When personal information will be sent or stored outside of Quebec
- When personal information is shared for research or statistics without asking for consent
- When a third party is hired who will handle personal information
- If systems are engaged to track location, behaviour, or browsing activity
- If there is a significant change in how VGPN collects, uses, or protects personal information

12. Reporting a Privacy Incident

If a privacy breach happens or is suspected, staff must report it right away to the Privacy Officer. The incident will be reviewed and logged. If necessary, affected individuals and privacy regulators will be notified.

13. Collection of Information from Minors

We do not collect personal information from children under the age of 14 without the consent of a parent or legal guardian. For youth aged 14 and older, their consent may be accepted, but we may also request additional parental consent depending on the sensitivity of the information or the context. All information collected from minors is treated with the highest level of confidentiality and protection.

14. Staff Training and Reminders

VGPN provides training to ensure staff and board members understand privacy expectations. Reminders and updates are shared when processes or laws change.

15. Policy Review and Revisions

We review this policy at least once a year. Any updates are shared internally and published on our website.

16. About the Commission d'accès à l'information (CAI)

The Commission d'accès à l'information (CAI) is an independent public body that oversees the application of privacy laws in Quebec, including Law 25. The CAI makes sure that organizations like ours respect your rights when we collect, use, or share personal information.

If you have a concern about how your information is handled, or if you feel your privacy rights have not been respected, you can contact the CAI for advice or to file a complaint. The CAI also provides information to help individuals better understand their rights under Quebec's privacy laws.

Website: <https://www.cai.gouv.qc.ca>

Contact Us

If you have questions or want to make a request related to your personal information, contact our Privacy Officer:

Jessica Synnott, Executive Director

info@vgpn.ca

418-368-3212

*See Appendix A for a summary of the personal information we collect, how it is stored, and how long it is kept.

This document has been drafted in plain language and is available on our website at www.vgpn.ca in accordance with Quebec's Law 25, which requires that privacy practices be accessible and easy to understand.