

Privacy Policy

1. Objective

This policy on the protection of personal information (hereafter “the Policy”) is intended to meet the obligations set in the *Loi sur la protection des renseignements personnels dans le secteur privé* (hereafter “the Law”), notably with respect to the collection, retention, use, communication, and destruction of personal information.

2. Definitions

Personal information: any information concerning a private individual that allows them to be identified.

File: includes both paper and digital files.

Confidentiality incident: consists of any access, use, or communication not authorized by law of personal information, including the loss of personal information or any infringement of its protection.

Sensitive personal information: personal information is sensitive when, due to its medical, biometric, or otherwise intimate nature, or due to the context of its use or communication, a high level of privacy is reasonably expected (for example, a social insurance number).

3. Person responsible for applying the Policy

The Secretary-Treasurer is responsible for protecting the personal information held by the Association of Graduate Students Employed at McGill (hereafter “the Union”). This person ensures that the Law is respected and enforced. They are also responsible for responding to requests to access or rectify personal information. Contact information for this person can be obtained on the website of the Union.

Responsibility for protecting personal information, in part or in its entirety, may be delegated in writing to another person.

4. Collection of personal information

The Union will not create a file on someone without a serious and legitimate reason. The purpose of a file must be indicated within the document itself or be stored alongside it.

The Union will only collect personal information necessary for the purpose of the relevant file.

The Union will inform the subjects of personal information collection of the purpose of the file, how it will be used, what categories of people will have access to it on behalf of the Union, the location the file will be stored, and rights concerning access to and modification of the file.

5. Use of personal information

The Union will establish a registry identifying the people who can access personal information.

The Union will limit access only to people for whom the personal information is necessary to the performance of their duties.

The Union will obtain the consent of the person concerned if it wishes to use their data for other purposes than those for which the data were collected.

For sensitive personal information, this consent will be obtained in writing.

6. Communication of personal information

The Union will inform concerned individuals of the name or categories of third parties to whom personal information will be communicated.

The Union will obtain consent from concerned individuals to communicate their personal information to third parties, unless otherwise provided for in the Law. This consent will be obtained in writing when it concerns sensitive personal information.

The Union will ensure that emails containing personal information are limited to authorized persons and sent to the proper recipients.

7. Retention of personal information

The Union will take the security measures enumerated in this section to safely store personal information. Different measures will be taken for digital and paper documents.

7.1 Paper documents

The Union will establish measures to control and restrict access to the spaces in which personal information is stored.

The Union will store personal information in locked containers. Only persons authorized to access the information will be able to unlock the containers.

7.2 Digital documents

The Union will establish a system to control and identify who accesses personal information stored in a digital format.

The Union will use technologies to ensure the confidentiality and security of personal information that it holds appropriate for the sensitivity of the information.

8. Destruction of personal information

The Union will destroy personal information in a secure manner once the purposes for which it was collected have been accomplished. Personal information will be destroyed at the latest seven years after a file is closed.

The Union will put into place a procedure to systematically and securely destroy personal information.

9. Confidentiality incident

The Union will act to limit the impact of any security breach relative to personal information upon becoming aware of it.

If the security breach presents a risk of serious injury, the Union will inform the affected individuals and the *Commission d'accès à l'information* once it is reasonably possible to do so.

The Union will maintain a registry of confidentiality incidents in conformity with the Law.

10. Rights to access and rectify a file

Any person may submit a request to the Union to verify if a file on them exists.

10.1 Right to rectify

Any person whose personal information is held by the Union has the right to rectify imprecise, incomplete, or incorrect information concerning them, or to remove information that is outdated or is no longer required for the purposes of the file.

10.2 Right to access

Any person whose personal information is held by the Union may request a copy of the information concerning them. The Union may refuse this request for the reasons specified in the Law.

10.3 Procedure for requests to access or rectify

Requests to access or rectify personal information must be made in writing to the Secretary-Treasurer.

The Union must respond with a request to access or rectify a file within 30 days of receipt. If no response is sent within this period, the Union is deemed to have refused the request.

When the Union refuses a request, it must notify the sender of its decision in writing, explain the reason for the refusal, and indicate what recourse is available.

11. Complaints

Any person may file a complaint concerning the collection, use, retention, communication, or destruction of personal data by the Union with the person previously designated to apply the Policy.

12. Privacy impact assessments

When a Privacy Impact Assessment (*Évaluation des facteurs relatifs à la vie privée*) is required under the Law or a regulation of the union, the Executive Committee will form an Ad-Hoc Committee to conduct the assessment. The results of Privacy Impact Assessments are non-confidential.

13. Publication of the Policy

The Union will ensure that the workers it represents are aware of the Policy by publishing it and any future versions.