



# Confidentiality policy

*Last Updated: August 2023*

The City of Beaconsfield is committed to protecting the confidentiality and security of your personal information.

This policy is of relevance to you. It describes how we collect, use, and disclose your personal information. It also explains how you can request access to this information or have it corrected, when necessary.

When you provide us with personal information through our website or one of our mobile applications after reading this policy, you consent to us using and disclosing it as described.

## **HOW:**

when you browse our website or get in touch with us, we collect certain information about you that allows us to identify you.

## **WHAT:**

we collect information that allows us to identify you and information about your use of our services.

## **WHY:**

to better serve you, answer your questions, process your requests, and administer our website or applications. Who else: suppliers who assist us in processing payments or communicating with you will have access to certain information.

## **WHERE:**

we are located in Quebec, but some of our suppliers may have access to your information outside of Quebec.

## **YOUR RIGHTS:**

you have the right to request access to or rectification of this information by writing to us.

## **YOUR CONSENT:**

you have the right to withdraw your consent at any time, but this may prevent us from continuing to serve you.

## What is meant by “personal information”?

“Personal information” can, on its own or in combination with other information, allow for your identification, location, or for us to contact you.

## How do we collect your personal information?

The City may ask you to provide personal information that allows for your identification in order to process it in a context requiring your identification. In such cases, the City explicitly presents the personal information that needs to be provided and its usage so that you can provide explicit consent for the collection of this personal information.

### For example, we collect your personal information when you:

- Fill out an online request form (council question, newsletter subscription, information request, electronic signboard request, facility reservation, neighborhood event, library suggestion, etc.)
- Register for an activity or service
- Apply for a permit
- Sign up for the list of vulnerable people

Third parties also collect personal information on behalf of the City<sup>1</sup>, such as:

- B-CITI - to manage citizen requests
- SirsiDynix - to manage the library account
- Workland - to manage job applications
- Mailchimp - to communicate the City’s newsletter
- CodeRed - to communicate with residents during certain emergency situations
- Consigno - to collect electronic signatures

## What information do we collect and why?

We only collect the personal information that is necessary to provide our municipal services. Thus, we may collect the following information<sup>2</sup>:

### Information about your identity

The required information varies depending on the service offered

#### Which ones?

- Your personal contact details, such as your name, address, email, and phone number
- Information related to your library account
- Sensitive information such as your social insurance number, health insurance number, and date of birth.
- Information about other individuals (a power of attorney, your spouse or common-law partner, or dependents listed in your leisure file (IC3))
- Your signature

<sup>1</sup>the list of third parties is non-exhaustive and may vary depending on the use of new applications

<sup>2</sup>this list is non-exhaustive and may vary depending on the use of new applications

**Why?**

- To respond properly to your questions, comments, and suggestions;
- To deliver and improve services;
- To send you relevant alerts and notices based on your user profile;
- To understand user demographics and for statistical purposes.

**Usage Information****Which ones?**

- Certain technical information and device-related information regarding your use of our services. This information may include your device's unique identifier, information about your device, browser, and operating system, as well as the date and time of our site usage.
- Our website may use cookies or similar technologies such as beacons or pixels to provide you with a richer browsing experience, enhance performance, and generate audience statistics. These are files that are installed on your computer's hard drive or browser to collect information such as your preferred language, browsing history, and the type and version of the browser you are using. A user can, at any time, modify their browser's privacy settings to block cookies or delete those already stored. This action does not prevent access to the service, but may impact its performance during your visit.
- Google Analytics: The City utilizes analytics tools (Google Analytics) for its service. These tools enable the collection, analysis, measurement, and presentation of data on site visits, with the aim of understanding and optimizing service usage. The City retains this type of information to track, among other things: the number of visitors, the most frequently visited pages, user technology preferences, referring websites, and the country from which users are connecting.

**Why?**

- To optimize your experience.
- To customize usage preferences.

**Other uses:****Occasionally, we may need to use your personal information to:**

- Comply with legal obligations
- Prevent cyber threats and fraud
- Respond to requests, warrants and court orders from courts and other organizations
- Protect your rights and interests as well as our own
- Cooperate in legal proceedings or investigations

**To whom do we disclose your personal information?**

In certain circumstances, we use suppliers to assist us in serving you. Before sharing your personal information with them, we take reasonable steps to ensure that they undertake to comply with this policy.

## **Category of Third Parties**

Citizen Relationship Management:

Purpose: Provide a service (send our newsletter and other notices via email)

Relationship Management with the Agglomeration of Montreal:

Purpose: Property management

## **Where is your information hosted?**

We host and process your personal information in Quebec. In certain circumstances, they may be hosted outside of Quebec, where we engage third-party service providers, notably in Canada and the United States.

Your personal information may be hosted in countries other than your country of residence, which may have different rules for the protection of personal information. They are subject to the laws of the country in which they are located and may be disclosed to the government, courts, or law enforcement agencies or regulators of that country.

However, our practices regarding your personal information are at all times governed by this policy and applicable Quebec laws on the protection of personal information.

## **How long do we retain your personal information?**

We will retain your personal information for as long as necessary for the purposes described in this policy, to comply with our legal obligations, settle disputes and conclude agreements with our customers or partners.

We delete obsolete or unnecessary personal information, for example, if you inform us that you have permanently stopped using our services. You can request the correction or deletion of information at any time.

## **How do we protect your personal information?**

### **Measures:**

We have implemented physical, administrative, and technical protection measures to safeguard the confidentiality and security of the personal information we hold, including preventing unauthorized access.

In case of an incident involving personal information, we have a procedure. It stipulates that we will notify the authorities and affected individuals when such an incident poses a risk of serious harm, and we will implement measures to mitigate negative consequences.

## **Access Limitation**

Only authorized and qualified personnel who need to access your personal information in the course of their duties have access to it. Furthermore, for certain access and when available, employee accounts and server access are subject to dual authentication.

## Disclaimer

However, no security measure is absolute or entirely guaranteed. If you have reason to believe that your interaction with us is no longer secure (for example, if you believe the security of the information you have provided to us has been compromised), please contact us immediately at the address provided in the “[Contact Us](#)” section.

## When does this policy not apply?

This confidentiality policy applies solely to the collection, use, and disclosure of personal information conducted by the City of Beaconsfield. It does not apply to websites operated by third parties over which we have no control. If you follow a link to a third-party site (for example, to register for a service offered by a third party), the confidentiality policy of that third-party site will apply. We are not responsible for their policies, procedures, or practices regarding the protection of personal information. We encourage you to review these policies before submitting personal information to these third-party sites.

## What are your rights regarding personal information?

### Access, deletion, and rectification

You can access the personal information we hold about you and, where applicable, request corrections, as permitted or required by law. You can also request the deletion of outdated or unjustified information or provide written comments.

However, to ensure that the personal information we hold about you is accurate and up to date, please inform us promptly of any changes.

Upon your request, and unless it poses significant practical difficulties, we can provide you with computerized personal information in a structured and commonly used technological format. We will also disclose this information to any person or organization authorized by law to collect such information, if you so desire.

### Withdrawal of Your Consent

You can also withdraw your consent to the collection and disclosure of collected personal information. However, this may affect our ability to offer you certain services.

To exercise your rights, please write to us at [info@beaconsfield.ca](mailto:info@beaconsfield.ca) (see the “[Contact Us](#)” section for other options). We may request identification to ensure it is indeed you.

To learn more about the rights provided by Quebec laws that protect your confidentiality, please refer to the following links: [Quebec](#) (in French only).

## Complaint

You may avail yourself of the complaint handling process related to the protection of personal information outlined in the governance rules of the public organization with respect to personal information published under section 63.3 of the Law.

## How to Contact Us?

For any questions or comments regarding this policy or the protection of your personal information, please contact our Person in charge of the protection of personal information at the following coordinates:

**Me Nathalie Libersan-Laniel**

**Clerk and Director of Registry and Public Affairs**

[greffe-registry@beaconsfield.ca](mailto:greffe-registry@beaconsfield.ca)

Our Person in charge of the protection of personal information is responsible for addressing requests for access or correction, providing information, and handling any complaints you may have regarding our practices concerning your personal information.

## Will We Update This Policy?

If we make significant changes to this policy, for example, to comply with new legal requirements, we will notify you so that you can make an informed choice about your use of our services. We will make the new version available on the website, indicating the date of the last update. If you have provided us with your contact information, we will send you a notice of the modification.

Effective Date: September 22, 2023

Date of the most recent update: September 22, 2023