POLICIES AND PRACTICES GOVERNING THE GOVERNANCE OF PERSONAL INFORMATION

A. Components of the Governance Program		
Organizational Commitment	**a) Management Participation**	Management supports the Personal Information (PI) Governance Program and promotes a privacy-friendly culture by: • Appoint a Privacy Officer; • Approve program control measures; • Monitor the program and report to the Management Board as necessary; • Provide the resources needed to ensure the program's success.
	b) Privacy Manager	Responsible for the development and implementation of program control measures, as well as their ongoing evaluation and revision.
	c) PI Protection Committee	• Reinforces the Privacy Officer's ability to monitor compliance and create a culture of privacy within the organization. • Ensures that PI protection is integrated into all major functions where PI is used.
	d) Preparation of reports	The organization has established accountability mechanisms and takes them into account in its program control measures.
Governance Program Control Measures	**a) PI Inventory**	The organization is able to determine: • PI owned or controlled by the company; • The need to collect, use and communicate PI; • The sensitive nature of PI; • Safety measures in place.
	b) Policies, Directives and Procedures	• PI Protection Policy detailing the roles and responsibilities of staff members throughout the life cycle of this information;

		• Directive on the collection, use and communication of PI; • Directive on the preservation and destruction of PI; • Directive on PI security measures; • Procedure for handling PI requests and complaints; • Procedure for managing confidentiality incidents involving PI; • Privacy Policy for PI collected via the website.
	c) Risk Assessment Tools	Privacy Impact Assessments (PIAs) for : • Any project involving the acquisition, development or redesign of an information system or the electronic provision of services involving the collection, use, communication, retention or destruction of PI; • Communicate PI outside Quebec or entrust a third party located outside Quebec with the task of collecting, using, communicating or storing PI on its behalf; • Communicate PI to a third party without the consent of the persons concerned for the purposes of study, research or the production of statistics. Confidentiality incident risk assessment grid.
	d) Training and Awareness-Raising	A training program for all employees, including management, covering the following topics • Applicable laws, policies, guidelines and internal procedures relating to PI protection; • Techniques to identify and recognize confidentiality incidents; • Dealing with complaints and requests for PI protection; • The consequences of violating laws and internal rules regarding PI protection.
	e) Confidentiality Incident Management Protocol	The organization has set up a procedure and appointed a person responsible for managing confidentiality incidents involving PI. It has clearly defined responsibilities for internal and external reporting of breaches.

		The organization keeps a register of all confidentiality incidents, even those that do not involve a risk of serious harm.
	f) Service Provider Management	The organization incorporates confidentiality clauses or enters into a Data Subcontracting Agreement with its service providers that provide for, among other things: • PI protection measures; • The use of PI for contract performance; • Destruction of PI at the end of the contract; • The obligation for the service provider to notify the organization without delay in the event of a breach or attempted breach of confidentiality obligations; • The possibility for the organization to request any document and carry out any verification relating to the confidentiality of PR.
	g) External Communications	The organization informs individuals of their PI protection rights and the control measures of its governance program. The Privacy Policy available on the organization's website is written in simple, clear terms and includes in particular: • The purposes of collecting, using and communicating personal data, as well as their protection and retention period; • Inform individuals if their PI is shared with third parties outside Quebec; • Contact details for the Privacy Manager to whom questions, requests or complaints can be forwarded.

B. Ongoing Evaluation and Revision of the Governance Program	
Monitoring and Review Plan	The organization has developed an annual monitoring and review plan that sets out how it monitors and evaluates the effectiveness of the controls in its PI governance program.
Evaluate and Revise Governance Program Controls as needed	1. Update PI inventory; 2. Review policies, guidelines and procedures; 3. Treat risk assessment tools as living documents; 4. Modify training and awareness courses; 5. Adapt management protocol in the event of a confidentiality incident; 6. Fine-tune service provider management; 7. Improve external communications.