

# PRIVACY POLICY

**Approval:**

August 16, 2023, by the Committee on Access to Information and the Protection of Personal Information

**Coming into effect:**

September 22, 2023

VILLE DE  
MONT-ROYAL



TOWN OF  
MOUNT ROYAL

# PRIVACY POLICY

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## **1. PURPOSE**

Town of Mount Royal is committed to protecting the privacy and safety of your personal information.

This policy concerns you. It describes how we collect, use and disclose your personal information. It also explains how you can request access to this information or, when necessary, correct it.

When, after having read this policy, you provide personal information to us via our website or one of our mobile apps, you agree that we use and share it as described in this policy.

## **2. OVERVIEW**

### **HOW:**

When you visit the Town's website, download one of our mobile apps or contact us, we collect certain information about you that enables us to identify you.

### **WHAT:**

We collect information that allows us to identify you, information about purchases and information about the use you make of our services.

### **WHY:**

To better serve you, answer your questions, handle your requests and manage our website and apps.

Who else is involved? Suppliers that help us process payments and communicate with you also have access to some information.

### **WHERE:**

Some of our suppliers outside Quebec may also have access to your information.

### **YOUR RIGHTS:**

You can request access to and the correction of your information simply by writing us.

### **YOUR CONSENT:**

You can withdraw your consent at any time, though doing so may prevent us from continuing to serve you.

## **3. WHAT DO WE MEAN BY "PERSONAL INFORMATION"?**

Personal information is information that, by itself or in combination with other information, makes it possible to identify, locate or contact you.

## **4. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?**

We collect your personal information when you:

- Fill out an online request form, for example:
  - o Signing up for a newsletter
  - o Requesting access to information
  - o Submitting a claim

- Applying for a dog or cat licence
- Making a tax payment
- Apply for a permit
- Register for a recreational activity
- Are involved in a recruitment process with the Town.

## 5. **WHAT INFORMATION DO WE COLLECT AND WHY?**

We collect only the personal information we require in order to provide our municipal services. Although the information is accessible to Town employees, consultation is limited to the information necessary to carry out their duties. Accordingly, we may collect the following information:

### 5.1.1 Information about your identity

#### **Which information?**

Family name, first name, address, telephone number, email address, date of birth, health insurance number, emergency contact, signature, etc.

#### **Why?**

- To correctly reply to your questions, comments and suggestions
- To improve services
- To provide personalized customer service
- For safety reasons, most notably when registering you for a recreational activity

### 5.1.2 Information about use

#### **Which information?**

- Language of correspondence
- Some technical, device-related information regarding your use of our services (your device's unique identifier, information about your device, your browser and operating system and the date and time you visited our site)
- The Town's website may use cookies or similar/equivalent technology, such as beacons or pixels, to provide a richer browsing experience, improve system performance and generate viewer statistics

#### **Why?**

- To optimize the citizen experience

## 6. **GENERAL**

We occasionally have to use your personal information to:

- Meet our legal obligations
- Prevent cyberthreats and fraud
- Reply to requests, warrants and court orders
- Protect your rights and interests and those of the Town
- Cooperate in legal proceedings and inquiries.

## 7. **WHO DO WE RELEASE YOUR PERSONAL INFORMATION TO?**

In some circumstances, we call on suppliers to help us serve you. Before sharing your personal information with them, we take reasonable measures to ensure these suppliers undertake to comply with this policy.

<b>Category of third party</b>	<b>What they do for us</b>
Managing citizen relations	Sending the newsletter and email notices
Managing relations with the Agglomeration of Montreal	Managing landownership
Managing recreational activities	Providing services for arts- and sports-related activities

## 8. **WHERE IS YOUR PERSONAL INFORMATION STORED?**

We store and process your personal information in Quebec. On some occasions, when we use third-party service providers, it may be stored outside Quebec, mainly in Canada and the United States.

Your personal information may be sent to countries other than your country of residence and these countries may have different rules regarding the protection of personal information. In such cases, the information is subject to the laws of the country in which it is found and may be released to government bodies, courts or law enforcement or regulatory bodies in the country concerned.

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

## 9. **HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**

We keep your personal information for as long as necessary for the purposes described in this policy and to meet our legal obligations, resolve disputes and enter into agreements with suppliers when applicable.

We delete your personal information in accordance with the Town's records retention schedule.

## **10. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

### Measures

We have implemented physical, administrative and technical measures to protect the confidentiality and security of the personal information we hold, most notably to prevent unauthorized access.

Our servers are managed by the Town and a specialized third party.

We also have a plan in place should an incident involving personal information occur. Under the plan, we will notify authorities and the persons concerned when such an incident presents a risk of serious harm and take action to limit any negative consequences.

### Limited access

Only authorized and qualified personnel needing to view your personal information as part of their duties are given access to it. In addition, all employee accounts and access to remote servers are subject to two-factor authentication.

### Disclaimer

However, no security measure is absolute or failsafe. If you have reason to believe your interaction with us is not secure (for example, if you think the safety of the information you have provided has been compromised), please contact the Town immediately; you will find the Town's contact information in the [Contact Us](#) section of the Town website.

## **11. WHEN DOES THIS POLICY NOT APPLY?**

This policy 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 an event), the privacy party of the third-party site will apply. We are not responsible for their personal information policies, procedures and practices. We encourage you to learn about these policies before submitting personal information on these websites.

## **12. WHAT ARE YOUR RIGHTS REGARDING PERSONAL INFORMATION?**

### 12.1 Access, deletion and correction

You are entitled to access the personal information about that you we hold and, if applicable, request corrections in accordance with the laws that allow or require it. You can also request that outdated or unjustified personal information be deleted or submit comments in writing.

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

On your request and provided it does not entail serious practical difficulties, we can provide you with your personal information computerized in a structured, commonly used technological format.

### 12.2 Withdrawal of your consent

You can also withdraw your consent for us to use and release the personal information collected about you. In such cases, however, we may no longer be able to provide certain services to you.

To exercise your rights, email us at [info@mont-royal.qc.ca](mailto:info@mont-royal.qc.ca) (see the [Contact Us](#) section of the Town website). Please note that we may ask you for an ID to be sure it is indeed you.

### **13. HOW TO CONTACT US**

For any question or comment about this policy or the protection of your personal information, please contact the Person in Charge of the Protection of Personal Information:

Mr. Alexandre Verdy  
Town Clerk and Director of Public Affairs  
[townclerk@town.mount-royal.qc.ca](mailto:townclerk@town.mount-royal.qc.ca)  
514-734-2988

Our Person in Charge of the Protection of Personal Information will reply to requests for access to or correction of personal information and look into any complaint you may have regarding our personal information practices.

### **14. WILL THIS POLICY BE UPDATED?**

If we make significant changes to this policy – to conform with new legal requirements, for example – the Town will publish a notice of change 15 days before the changes take effect. The new version of the policy, along with the notice of change, will be made available to you on the Town website, with the date of the latest update indicated.

### **15. COMPLIANT HANDLING**

A person concerned about personal information may avail themselves of the process for handling complaints related to the protection of personal information, as provide in the Governance Policy Regarding the Protection of Personal Information.

### **16. COMING INTO EFFECT**

This policy comes into effect on September 22, 2023.