


# Protection of Personal Information (PPI) Policy

	<b>Title :</b> Privacy Policy	<b>Policy No. :</b> POL-PPI-02 Privacy
	<b>Prepared by :</b> Access to Information and Privacy Committee (“Access Committee”)	<b>Revision No. :</b>
	<b>Ratified by the Access Committee :</b> September 22, 2023	<b>Coming into effect :</b> September 22, 2023

## The Town’s commitment :

The Town of Kirkland 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 correct it, when necessary.

When you provide us with personal information in writing, verbally or online, via our website or one of our mobile applications, you consent to our use and disclosure of such information in the manner described in the Policy.

## This Policy at a glance :

### HOW :

When you visit our website, download one of our mobile applications 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 applications.

Who else is involved? Suppliers that help us process payments, provide a service or communicate with you also have access to certain information.

### WHERE :

Mostly in Quebec, but some of our suppliers may also have access to your information outside of Quebec.

## **YOUR RIGHTS :**

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

## **YOUR CONSENT :**

You have the right to withdraw your consent at any time, but this may have an effect on the services offered.

## **What do we mean by « Personal Information »?**

« Personal Information » is any information about an individual that makes it possible to identify them, either directly - using only this information - or indirectly - in combination with other information.

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

We collect your personal information when you :

- Fill out one of our online forms;
- Browse on our website;
- In writing or verbally at one of our service locations.

## **What information do we collect and why?**

We collect only the personal information we require in order to provide our municipal services. The personal information we collect is gathered in a variety of ways, including in writing, verbally or online. This includes our computer systems, online forms and the interactivity between you and our website. We also use cookies or log files to gather information about you.

Accordingly, we may collect the following information :

### **1) Information about your identity :**

- Last name, first name;
- Address and postal details;
- Email address;
- Telephone or Fax numbers;
- Any other personal information required as the case may be (date of birth, SIN, resume, credit card number, etc.).

### **2) Website usage information :**

- Cookies or browsing logs;

- Online correspondence or comments;
- User behaviour analysis systems, etc.

### **3) Documents related to municipal online services :**

In connection with our various online municipal services, your personal information is collected through various computer systems and forms, namely :

- Online requests;
- Access to information, claim or other service request forms;
- Registration forms (e.g. Day Camp, Emergency Information System, Online Services, Newsletter, etc.);
- Service forms (e.g. Taxation, Water meters, etc.);
- Subscription and access form (e.g. Library, etc.);
- License application form, certificates of authorization or permit request;
- Rental application form;
- Scholarship application form;
- Financial support application form;
- Employment application form;
- Surveys, etc.

### **4) Why?**

In connection with our various municipal services, we use the personal information collected for the following purposes :

- Information and service offers;
- Contacts and correspondence;
- Registration or subscription to services and contests;
- Follow-up, management and answers to requests, applications, registrations, subscriptions, licenses, certificates of authorization, permits, rentals, scholarships, financial support, jobs, etc.;
- Surveys and statistics;
- Website management, service improvement, personalized welcome, etc.

We occasionally have to use your personal information to :

- Meet our legal obligations;

- Prevent cyber threats and fraud;
- Respond to requests, warrants and orders from courts and other agencies;
- Protect your rights and interests as well as ours;
- Cooperate in legal proceedings or investigations, etc.

### **Who do we disclose your personal information to?**

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

### **Where is your personal information stored?**

We store and process your personal information in Quebec. In certain circumstances, it may be stored outside Quebec, when we use third-party service providers, mainly in Canada and the United States, but also elsewhere in the world.

Your personal information may be stored in countries other than your country of residence, which may have different privacy rules. In such cases, the information is subject to the laws of the country in which it is located, and may be disclosed to the governments, courts or law enforcement or regulatory agencies of that country.

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.

### **When does this Policy not apply?**

This Policy does not apply to websites operated by third parties over whom we have no control. If you follow a link to a third-party site (for example, to register for an event), the privacy policy of that third party site will apply. We are not responsible for their privacy policies, procedures or practices. We encourage you to review these policies before submitting any personal information on these websites.

### **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, to comply with our legal obligations, to settle disputes and to enter into agreements with suppliers, when applicable.

We take reasonable steps to delete obsolete or unnecessary personal information, for example, when you tell us that you no longer wish to use our services. You may request the correction or deletion of information at any time. On this subject, please see "What are your rights?" below.

## **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.

We have a plan in the event of an incident involving personal information. It stipulates that we will notify the authorities and the persons concerned when such an incident presents a risk of serious harm, and that we will put in place measures to limit negative consequences.

### **Limited access**

Only authorized personnel who need to consult your personal information in carrying out their duties have access to it. In addition, employee accounts and access to servers and applications are subject to up-to-date security standards, including, among other things, double authentication.

### **Disclaimer**

However, no security measure is absolute or fully guaranteed. If you have reason to believe that your interaction with us is no longer secure (for example, if you believe that the security of any information you have provided to us has been compromised), please contact us immediately at the address listed in the "How to contact us" section below.

## **What are your rights?**

### **Access, deletion and correction**

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

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

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

### **Withdrawal of your consent**

You can also withdraw your consent to the use and disclosure of your personal information. However, certain services require the use of your personal information. If you

withdraw your consent, we may no longer be able to offer you these services. Some of the information we collect may not be retrievable by law (e.g. Taxation, Billing, Infraction, etc.).

To exercise your rights, please write to us at the address indicated in the "How to contact us" section below. Please note that we may ask you for identification to make sure it's you.

To find out more about your rights under Quebec privacy laws, visit <https://www.cai.gouv.qc.ca/english/>.

## **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 (PCPPI) at the following coordinates :

### **Person in Charge of the Protection of Personal Information (PCPPI)**

Fabienne Gariépy  
Director of Legal Affairs and Town Clerk  
Town of Kirkland  
17200 Hymus Boulevard  
Kirkland (Quebec) H9J 3Y8  
[greffe@ville.kirkland.qc.ca](mailto:greffe@ville.kirkland.qc.ca)

If you have reason to believe that your interaction with us is no longer secure, please contact us at : [pji@ville.kirkland.qc.ca](mailto:pji@ville.kirkland.qc.ca).

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

### **Will this Policy be updated?**

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

This Policy comes into effect on September 22, 2023.