

Personal information protection policy and confidentiality policy

MONTREAL-CONCORDIA ELITE KARATE CLUB

1. Context

The Montreal-Concordia Elite Karate Club (hereinafter, the “CEKMC”) is a non-profit organization whose mission is to teach traditional karate as a martial art, as a sporting discipline and as a method. of education and personal maturation, to promote the emergence of high-level athletes in the field of traditional karate, to train competent martial art instructors and to promote traditional shotokan style karate of the International Federation to the public of Shotokan Karate.

This policy aims to ensure the protection of personal information and to govern the way in which CEKMC collects, uses, communicates, stores and destroys it or how it otherwise manages it. In addition, it aims to inform any interested person about how the CEKMC processes their personal information. It also covers the processing of personal information collected by the CEKMC by technological means.

2. Application and definitions

This policy applies to CEKMC, including its officers, employees, consultants, volunteers, suppliers and partners as well as any person who otherwise provides services on behalf of CEKMC. It also applies to the CEKMC website, as well as all websites controlled and maintained by the CEKMC.

It covers all types of personal information managed by the CEKMC, whether it is the information of its clients, potential or current, its consultants, its members, its suppliers, partners or any other persons (such as visitors to its websites or other).

For the purposes of this document, personal information is information which concerns a natural person and which allows, directly or indirectly, to identify them. For example, this could be a person's name, address, email address, telephone number, gender or banking information, health information, ethnic origin, language , etc.

Sensitive personal information is information for which there is a high degree of reasonable expectation of privacy, e.g. ex. health information, banking information, biometric information, sexual orientation, ethnic origin, political opinions, religious or philosophical beliefs, etc. This information can be virtual, paper or audio.

Generally speaking, an individual's professional or business contact information does not constitute personal information, for example an individual's name, title, address, email address or work telephone number. More particularly and for the sake of precision, within the meaning of the Act respecting the protection of personal information in the private sector of Quebec, and as of September 22, 2023, sections 3 (collection, use, communication), 4 (conservation and destruction) and 6 (data security)

do not apply to information about a person relating to the exercise of a function in a company, such as their name, title, function, as well as address, I email address and workplace telephone number.

These same paragraphs also do not apply to personal information that has a public nature under the law, as soon as this policy comes into force.

The CEKMC website offers hyperlinks to other websites for which it is not responsible. The information exchanged on these sites is not subject to this policy, but to that of the external site, if one exists.

3. Collection, use and communication

As part of its activities, the CEKMC may collect different types of information for different purposes. The types of information that CEKMC may collect, their use (or intended purpose) as well as the means by which the information is collected are indicated in Appendix A of this policy.

The CEKMC will also inform the persons concerned, at the time of collecting personal information, of any other information collected, the purposes for which it is collected and the means of collection, in addition to other information to be provided as required by law .

The CEKMC applies the following general principles regarding the collection, use and communication of personal information:

Consent :

Generally, CEKMC collects personal information directly from the person concerned and with their consent, unless an exception is provided for by law. Consent may be obtained implicitly in certain situations, for example, when the individual decides to provide their personal information after having been informed by this policy on the use and communication for the purposes indicated therein (see Appendix A for more details). Thus, this policy and the information it contains may be consulted by the person concerned at the time of collection of personal information.

Normally, the CEKMC must also obtain the consent of the data subject before collecting their personal information from third parties, before communicating it to third parties or for any secondary use thereof. However, the CEKMC may act without consent in certain cases provided for by law and under the conditions provided for therein. The main situations where CEKMC may act without consent are indicated in the relevant sections of this policy.

Collection:

In all cases, CEKMC only collects information if it has a valid reason to do so. In addition, the collection will only be limited to the necessary information needed to fulfill the intended purpose.

Collection from minors (including volunteers)

When collecting personal information from a child, it is always done with the responsible parent or legal guardian.

Collection from third parties

CEKMC may collect personal information from third parties. Unless there is an exception provided for by law, the CEKMC will request the consent of the person concerned before collecting personal information concerning them from a third party. In the event that such information is not collected directly from the person, but from another organization, the person concerned may request the source of the information collected from CEKMC.

In certain situations, the CEKMC may also collect personal information from third parties, without the consent of the person concerned, if he or she has a serious and legitimate interest in doing so and a) if the collection is in the interest of the person and that it is not possible to do so from them in a timely manner, or b) if this collection is necessary to ensure that the information is accurate.

Possession and use:

The CEKMC ensures that the information it holds is up to date and accurate when it is used to make a decision relating to the person concerned.

CEKMC may only use an individual's personal information for the reasons stated herein or for any other reasons provided at the time of collection. As soon as the CEKMC wants to use this information for another reason or another purpose, new consent must be obtained from the person concerned, which must be obtained expressly if it involves sensitive personal information. However, in certain cases provided for by law, the CEKMC may use the information for secondary purposes without the consent of the individual, e.g. ex. :

- when this use is clearly for the benefit of that person;
- when necessary to prevent or detect fraud;
- when necessary to evaluate or improve protection and security measures.

Limited access. The CEKMC must put in place measures to limit access to personal information only to people within its organization who have the authority to read it and for whom this information is necessary in the exercise of their functions. The CEKMC will request the individual's consent before granting access to any other person.

Communication :

Generally, and unless otherwise indicated in this policy or otherwise provided for by law, CEKMC will obtain the consent of the individual concerned before communicating their personal information to a third party. In addition, when consent is necessary and when it concerns sensitive personal information, the CEKMC must obtain the explicit consent of the person before communicating the information.

However, the communication of personal information to third parties is sometimes necessary. Thus, personal information may be communicated to third parties without

the consent of the person concerned in certain cases, in particular, but not exclusively, in the following cases:

The CEKMC may communicate personal information, without the consent of the person concerned, to a public body (such as the government) which, through one of its representatives, collects it in the exercise of its responsibilities or the implementation of a program which he manages.

Personal information may be transmitted to its service providers to whom it is necessary to communicate the information, without the consent of the person. For example, these service providers may be event organizers, CEKMC subcontractors designated for the execution of mandates and cloud service providers. In these cases, the CEKMC must have written contracts with these suppliers which indicate the measures they must take to ensure the confidentiality of the personal information communicated, whether the use of this information is made only in the context of the execution of the contract and that they cannot keep this information after its expiration. In addition, these contracts must provide that suppliers must notify the CEKMC Personal Information Protection Officer (indicated in this policy) of any violation or attempted violation of the confidentiality obligations regarding the personal information communicated and must allow this responsible for carrying out any verification relating to this confidentiality.

If this is necessary for the purposes of concluding a commercial transaction, the CEKMC could also communicate personal information, without the consent of the person concerned, to the other party to the transaction and subject to the conditions provided for by law.

Communication outside Quebec: It is possible that personal information held by the CEKMC may be communicated outside Quebec, for example, when the CEKMC does business with organizations located outside the province (e.g. Fédération Internationale of Shotokan Karate).

Additional information on the technologies used

CEKMC collects personal information through technological means such as forms sent by email.

If CEKMC collects personal information by offering a technology product or service that has privacy settings, CEKMC must ensure that these settings provide the highest level of privacy by default.

4. Retention and destruction of personal information

Unless a minimum retention period is required by applicable law or regulation, CEKMC will only retain personal information for the period necessary to achieve the purposes for which it was collected.

At the end of the retention period or when the personal information is no longer necessary, CEKMC will ensure:

1. to destroy them; Or

2. to anonymize them (i.e. they no longer irreversibly allow the person to be identified and it is no longer possible to establish a link between the person and the personal information) to use them for serious and legitimate purposes.

The destruction of information by the CEKMC must be done in a secure manner, to ensure the protection of this information.

This section may be supplemented by any policy or procedure adopted by the CEKMC concerning the retention and destruction of personal information, if applicable. Please contact the CEKMC Privacy Officer (listed in this policy) for more information.

5. Responsibilities of the CEKMC

Generally speaking, the CEKMC is responsible for the protection of the personal information it holds.

The person responsible for the protection of personal information at CEKMC is Mr. Chanh Chau Tran cchautran@videotron.ca. He must, generally speaking, ensure compliance with applicable legislation regarding the protection of personal information. The manager must approve the policies and practices governing the governance of personal information. More specifically, this person is responsible for implementing this policy and ensuring that it is known, understood and applied. In the event of the absence or inability to act of this person in charge, the Club secretary will assume the functions of the person in charge of the protection of personal information.

CEKMC administrators and staff members (coaches, assistants and other volunteers) having access to personal information or being otherwise involved in the management of it must ensure its protection and respect this policy.

The roles and responsibilities of CEKMC administrators and staff throughout the life cycle of personal information may be specified by any other CEKMC policy in this regard, where applicable.

6. Data security

CEKMC is committed to implementing reasonable security measures to ensure the protection of the personal information it manages. The security measures in place correspond, among other things, to the purpose, quantity, distribution, medium and sensitivity of the information. Thus, this means that information that can be qualified as sensitive (see the definition provided in section 2) will have to be subject to greater security measures and will have to be better protected. In particular, and in accordance with what was mentioned previously concerning limited access to personal information, the CEKMC must put in place the necessary measures to impose constraints on the rights to use its information systems so that only administrators and CEKMC staff members who require access to it are authorized to access it.

7. Rights of access, rectification and withdrawal of consent

To assert their rights of access, rectification or withdrawal of consent, the person concerned must submit a written request to this effect to the person responsible for the protection of personal information at CEKMC, at cchautran@videotron.ca.

Subject to certain legal restrictions, data subjects may request access to their personal information held by CEKMC and request.

8. Complaint handling process

Reception

Any person who wishes to make a complaint relating to the application of this policy or, more generally, to the protection of their personal information by the CEKMC, must do so in writing by contacting the person responsible for the protection of personal information of the CEKMC, at cchautran@videotron.ca.

The individual must indicate their name, contact details, including a telephone number, as well as the subject and reasons for their complaint, giving sufficient detail so that it can be evaluated by the CEKMC. If the complaint made is not sufficiently precise, the person responsible for the protection of personal information may request any additional information that he considers necessary to be able to evaluate the complaint.

Treatment

The CEKMC undertakes to treat any complaint received confidentially.

Within 30 days following receipt of the complaint or following receipt of all additional information deemed necessary and required by the CEKMC personal information protection manager to be able to process it, the latter must evaluate it and formulate a reasoned response. written by email to the complainant. This evaluation will aim to determine whether the processing of personal information by the CEKMC complies with this policy, any other policies and practices in place within the organization and the applicable legislation or regulations.

In the event that the complaint cannot be processed within this period, the complainant must be informed of the reasons justifying the extension of the deadline, the progress of the processing of his complaint and the reasonable time necessary to be able to provide him with a final answer.

The CEKMC must create a separate file for each complaint addressed to it. Each file contains the complaint, the analysis and documentation supporting its assessment, as well as the response sent to the person who made the complaint.

It is also possible to file a complaint with the Commission d'accès à l'information du Québec or any other supervisory body regarding the protection of personal information responsible for the application of the law concerned by the subject of the complaint.

However, the CEKMC invites any interested person to first contact their personal information protection officer and to wait for the end of the processing process by the CEKMC.

9. Approval

This policy is approved by the CEKMC Personal Information Protection Officer, whose business contact details are as follows:

Responsible for the protection of personal information:

Chanh Chau Tran

Elite karate club Montreal-Concordia

Claude-Robillard sports complex

1000 Avenue Émile-Journault

Montreal (Quebec) H2M 2E7

cchautran@videotron.ca

For any requests, questions or comments regarding this policy, please contact the person in charge by email.

10. Publication and modifications

This policy is published on the CEKMC website, as well as on all websites controlled and maintained by the CEKMC, to which this policy applies, in relation to the personal information collected there. This policy is also disseminated by any means likely to reach the people concerned.

The CEKMC must also do the same for all modifications to this policy, which must also be the subject of a notice to inform the persons concerned.

Table of versions and changes: N/A (first version)

Annex A

Here is a non-exhaustive list of the types of information that CEKMC may collect, their use, or the intended purpose, as well as the means by which the information is collected. So, this includes, but is not limited to, the following.

Please note the personal information managed by the CEKMC is information of members (athletes), administrators and staff members (instructors, assistant instructors

and other volunteers). Please note that the CEKMC also collects the professional position of members (see section 2 on professional contact details).

Relationship Type of personal information Purpose of collection/uses Way of collecting information (means)

Members (athletes) - Last name, first name

- Date of birth
- Age
- Sex
- Phone number
- Name of responsible parent (if applicable)
- Address
- E-mail
- Expiry date of sports passport (if applicable)
- SKIF passport
- Photo(s) / Video(s)
- Grade
- Medical questionnaire
- Session/event
- Banking information (if applicable, e.g. payments by check). - Establish and manage relationships with members and obtain a means of communication.
- Register members for events organized by CEKMC or its partners.
- Ensure payment of costs related to services or events of CEKMC or its partners.
- Demonstrate the identity of the member receiving the services.
- Allows us to provide a personalized program to members and adapted to their specific conditions.
- Allows you to meet the requirements of public organizations - By email (directly or through a document, for example the affiliation request, session registration, camp registration).
- By telephone
- In person

Staff members (instructors, assistant instructors and other volunteers) - Last name, first name

- Address
- E-mail
- Phone number
- NCCP card - Validate instructor qualification - By email
- By telephone
- In person

Administrators – Last name, first name

- Address
- E-mail
- Telephone number - Registration in the Quebec Business Register - By email
- By telephone
- In person