

**Marguerite Bourgeoys Historic Site
Personal Information Protection Policy**

Date created:	October 2023
Board of Directors approval:	October 7
Effective:	October 8
Revised:	

1. Introduction

The Marguerite Bourgeoys Historic Site (MBHS) includes the Marguerite Bourgeoys Museum, a major archaeological site dating back over 2,400 years, and the Notre-Dame-de-Bon-Secours chapel. The site has long been an important gathering spot for those who have lived here, contributing to a strong sense of belonging to the region, and respect for the spirit of the place. The MBHS team upholds that relationship still today by providing a unique experience for visitors and maintaining a sincere, caring connection with them.

This Personal Information Protection Policy has been created in that spirit to describe the framework for the protection of personal information that governs all MBHS programs, services, and activities. This policy complies with the Act respecting the protection of personal information in the private sector, RLRQ c P-39.1.

2. Mission of the Marguerite Bourgeoys Historic Site

To preserve, promote, and transmit Marguerite Bourgeoys' memory, legacy, and invaluable work by sharing the history of a pivotal figure in the early days of Montreal: she was among the city's first teachers, a pioneer, entrepreneur, founder, and advocate, and a woman of character whose values remain relevant today.

3. Commitment

The protection of your privacy is a priority for the Marguerite Bourgeoys Historic Site.

The purpose of this policy is to inform you of the safeguards in place to protect personal information that you provide to the organization online or by any other means, in accordance with applicable laws and regulations.

The MBHS is subject to the Act respecting the protection of personal information in the private sector, L.Q., 1993, c. P-39.1.

The present policy does not apply to third-party websites that may be accessed through links from the MBHS website. The MBHS is not responsible for any such third-party websites.

4. General principles¹

As part of its activities and with your consent, the Marguerite Bourgeoys Historic Site may collect personal information in order to use it for the purposes described below. This policy details the ways in which the MBHS:

- collects personal information;
- uses personal information and;
- communicates personal information to third parties when necessary, with your consent.

All MBHS employees are required to apply the Personal Information Protection Policy and its resulting practices with regard to personal information management.

The Museum and the Chapel that comprise the MBHS share resources and objectives. Personal information provided to the Museum or to the Chapel will be shared between both entities when necessary, for the purposes set out in this policy, except in the event of explicit refusal on your part.

5. Definition of personal information

As per the Act, personal information is defined as “any information which relates to a natural person and directly or indirectly allows that person to be identified.”

6. Consent

¹ This Personal Information Protection Policy is based on the Montreal Museum of Fine Arts Policy on the protection of personal information, which in turn was informed by a legal memo created by Monette Barakett S.E.N.C .

You must provide explicit consent for the communication and use of your personal information. That consent shall be valid for the purposes outlined in this policy, as well as for specific purposes indicated at the time of consent, if applicable. Consent shall be valid for the duration required to meet the objectives specified at the time of consent, or the objectives set out in Section 10 of this policy. You may withdraw your consent at any time, as indicated in Section 17 of this policy.

7. Personal information

The Marguerite Bourgeoys Historic Site may collect personal information, with your consent and depending on the circumstances, including:

- personal data (surname, first name, telephone numbers, mailing address, email);
- date of birth and gender;
- company name;
- credit card, money order, or cheque information;
- donation history;
- MBHS website use data.

The information collected concerns identity and demographics and is used to facilitate transactions.

The MBHS does not knowingly collect information from children or anyone under the age of 14. If you are a minor under the age of 14, please do not provide any personal information without the express consent of a parent or guardian. If you are a parent or guardian and you are aware that your child has provided personal information to the MBHS, please contact the MBHS Privacy Officer (see Section 19 for contact information). If the MBHS becomes aware that its personal information has been collected from any minor children without verifying parental consent, it will take steps to delete that information.

8. Collection of personal information

The Marguerite Bourgeoys Historic Site website collects personal information when you use its services and voluntarily provide that information, by, for example:

- using services on-site or online;
- participating in an event, activity, or survey;
- submitting a question or comment by any means of communication;
- subscribing to electronic communications such as the MBHS newsletter;
- making a purchase;
- applying for a job;
- making a donation.

Personal information may also be provided through cookies² submitted through the MBHS website.

The collection of personal information is limited to information required for the purposes specified in this policy.

When the MBHS collects your personal information, you will have the opportunity to indicate that you do not wish to have the information stored for future use by the MBHS.

9. Cookies and web analytics

Some pages of the Marguerite Bourgeoys Historic Site website require cookies to help users browse more rapidly and to offer them content more likely to be of interest to them. No personal information is stored in cookies. The use of cookies is a common practice and many popular browsers are configured to allow them. However, you can configure your

² According to the Oxford English Dictionary, a cookie is “a packet of data sent by an Internet server to a browser which is returned by the browser each time it subsequently accesses the same server, used to identify the user or track their access to the server.”

browser to refuse or disable cookies. Note that if you disable cookies you will no longer be able to access certain features of our website.

Browsing data may be shared with authorized third parties with which the MBHS collaborates, such as partners. This data contains no personal information. The MBHS will take all reasonable steps to ensure that authorized third parties take the necessary measures to respect the confidentiality of your data. Authorized third parties include web analytics services such as Google Analytics.

The MBHS website may contain links to other websites. Any information you provide on those sites is not subject to this policy.

10. Use of personal information

The personal information you provide will be used exclusively for the following purposes:

- to identify you and authenticate your identity in the Marguerite Bourgeoys Historic Site computer system in order to facilitate transactions;
- to allow the MBHS to provide services adapted to your needs;
- to periodically communicate with you in writing, by phone, or electronically in order to keep you informed of MBHS activities;
- to allow the MBHS to keep statistics on visitors and patrons;
- to allow the MBHS to process your donations and prepare tax receipts, in accordance with tax laws;
- to allow the MBHS to carry out any necessary follow-up in the case of one-time donations;
- to allow the MBHS to inform donors of how their donations are being used;
- to allow the MBHS to recognize donor contributions through various communications, including annual reports;
- to allow the MBHS to process job applications and assess whether applicants meet the requirements of particular positions.

11. Retention period and destruction of personal information

Unless a minimum retention period is required by an applicable law or regulation, the Marguerite-Bourgeoys Historic Site will retain personal information only as long as necessary for the fulfillment of the purposes for which it was collected.

These timelines are consistent with the MBHS conservation schedule, which is based on legal obligations and best practices.

Users may withdraw their consent at any time.

12. Data storage

Personal data is stored digitally in secure cloud files.

13. Use and disclosure

The Marguerite Bourgeoys Historic Site uses personal information only for the purposes for which it was collected. Only members of the MBHS team who need to use personal information to achieve the purposes set out in this policy have access to that information.

The MBHS may disclose personal information in its possession:

- if an external firm is mandated to carry out a service contract to assist the MBHS in its activities;
- to carry out commercial and philanthropic development in relation with the purposes specified in this policy, always with the prior consent of users;
- if personal information must be disclosed to a third party for legal reasons.

The MBHS will take all reasonable steps to ensure that third parties take the necessary measures to respect the regulations and commitment of this policy.

14. Use, storage, disclosure, and destruction

a) Use of personal information

Your personal information will only be used for the purposes for which it was collected in accordance with Section 10 of this policy. The Marguerite Bourgeoys Historic Site will store your personal information confidentially for as long as necessary.

The MBHS will take appropriate material, organizational, and technological security measures to ensure the protection of your personal information. In addition, the MBHS will ensure that employees have limited access to personal information, in accordance with the levels specified in Section 15.

b) Storage of personal information

The MBHS abides by generally accepted industry standards to protect information, both during transmission and once the information has been received. The MBHS maintains appropriate material, technical, and administrative safeguards to protect personal information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, misuse or other unlawful forms of processing of the personal information in its possession. The MBHS has taken steps to ensure that confidentiality-bound staff who have access to your personal information are limited to those who need to know or whose duties reasonably require such information.

The MBHS notably restricts access to its offices and IT equipment, trains its staff, and requires any subcontractors and suppliers with access to personal information to sign confidentiality agreements and implement equivalent security measures.

Please note, however, that no method of transmission over the Internet and no means of electronic storage are completely secure. The MBHS cannot guarantee the security of any

personal information transmitted to us or provided by you, and any personal information is provided at your own risk.

c) Disclosure of personal information

The Marguerite Bourgeoys Historic Site may disclose personal information to third parties in the following cases:

- to MBHS employees, subcontractors, or suppliers such as service providers who by virtue of a service or business contract assist the MBHS in its activities only for the purposes authorized by law. The MBHS limits the information shared with these service providers to what is reasonably necessary to allow them to perform their duties, and the MBHS's contracts with these service providers require them to keep this information confidential;
- in all cases where, under the Act respecting the protection of personal information in the private sector, the disclosure of personal information is allowed without prior authorization.

The MBHS will take all reasonable steps to ensure that third parties take the necessary measures to respect the regulations and commitment of this policy.

d) Destruction of personal information

At the end of the retention period or when the information is no longer required, the Marguerite Bourgeoys Historic Site will ensure that personal information is:

- destroyed; or
- anonymized (i.e., such that it no longer identifies the individual, and that it is no longer possible to connect the individual and their personal information), so that it can be used for legitimate purposes.

The MBHS shall proceed to destroy personal information in a secure manner to ensure the information is protected.

15. Employee access

The Marguerite Bourgeoys Historic Site has taken measures to ensure the optimal protection of your personal information. To this end, three levels of security have been put in place:

- top level: employees with access to all personal information.
- high level: employees with access to some personal information.
- basic level: employees with access to minimal personal information.

The only people at the MBHS who have access to the high and top levels of personal information are the executive director, the assistant director, and the accountant.

Basic-level security clearance is afforded to the communications director and the head of concerts, events, and rentals, given the nature of their work. Other MBHS employees do not have access to your personal information.

16. Accuracy

The MBHS wishes to keep users' personal information as up to date as possible, and regularly takes steps to validate the information in its possession, as user transactions and exchanges take place. Your voluntary participation is greatly appreciated.

17. User rights

Access to your personal information and rectification

The MBHS allows you to access your personal information, subject to exceptions provided for by law, to know how it is used, including third-party disclosure, and to request any necessary corrections.

You can request a copy of your file for a reasonable fee.

Requests for access to personal information must be submitted in writing to the MBHS Privacy Officer (see Section 19). The MBHS will endeavour to process requests within 20 business days of receipt.

Withdrawing consent

You may ask to withdraw your consent to the MBHS's use of your personal information. Withdrawal of consent may result in the MBHS being unable to provide you with certain services, or may make the delivery of those services more difficult.

Any request to withdraw consent must be submitted to the privacy officer (see Section 19) with proof of identity. The MBHS will endeavour to process requests within 30 business days of receipt.

Complaints

Anyone wishing to file a complaint regarding the application of this policy or more generally regarding the Marguerite Bourgeoys Historic Site's protection of personal information must do so in writing to the privacy officer (see Section 19).

To file a complaint, please include your name and contact information, including a telephone number, as well as the subject of and the reasons for the complaint, with sufficient detail to allow the MBHS to assess the complaint. If a complaint is not sufficiently specific, the privacy officer may request any additional information deemed necessary to assess the complaint.

The MBHS treats all complaints confidentially.

The MBHS will endeavour to process complaints within 30 business days of receipt of the complaint or of the receipt of any additional necessary information required by the MBHS privacy officer in order to process the complaint; complainants will receive a written

response, with explanations or justifications, by email. The purpose of the complaint assessment process is to determine whether the MBHS's personal information management is in compliance with this policy, other policies and practices in place within the organization, and applicable legislation and regulations.

If a complaint cannot be dealt with within the prescribed timeline, the complainant will be informed of the delay and the reasons thereof, of the progress to date, and of a reasonable timeframe needed to provide a definitive response.

The MBHS will file complaints separately, including in each case the complaint, assessment, documentation supporting the assessment, and the response sent to the complainant.

18. Update

This policy may be amended from time to time to ensure ongoing compliance with the law and to reflect any changes that may occur in the processes related to the collection of personal information.

Users will be informed prior to any amendment to this policy, including regarding the general purpose of amendments to the Personal Information Protection Policy and the date on which amendments come into effect.

Effective on:

Last MBHS Board of Directors Personal Information Protection Policy update:

19. Marguerite Bourgeoys Historic Site Privacy Officer contact information

If you have any questions or comments about how we handle your personal information, our Personal Information Protection Policy, or if you wish to exercise any of your rights, please contact the MBHS Privacy Officer:

Email

direction@sitehmb.org

Mail

Marguerite Bourgeoys Historic Site, Attn. Privacy Officer
400 Saint-Paul Street East
Montreal, Québec H2Y 1H4

Telephone

514-282-8670 x 240

20. Declaration

All persons affected by the collection of personal information must confirm that they have read and understood and that they agree to the terms of the Marguerite Bourgeoys Historic Site Personal Information Protection Policy. They understand that they have been given the opportunity to refuse to allow the Marguerite Bourgeoys Historic Site to collect personal information, and confirm that:

- the Marguerite Bourgeoys Historic Site may collect confidential information about them in order to achieve the objectives described in Section 10 of this policy;
- the Marguerite Bourgeoys Historic Site may share confidential information collected in order to achieve the common objectives described in Section 10 of this policy, in accordance with applicable laws;
- they understand that they may withdraw their consent at any time.

2023-10-27