

## PRIVACY POLICY REGARDING PERSONAL INFORMATION

*Updated – September 22, 2023*

### **Preamble**

This privacy policy (hereinafter referred to as “this policy”) applies to all confidential information collected by GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS NOTAIRES S.E.N.C.R.L., in accordance with the *Act respecting the protection of personal information in the private sector*, as well as any other applicable law or regulation.

In this policy, the terms “we”, “us” and “our” refer to GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L., as well as its head office and all of its places of business.

With this policy, GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L. wishes to describe its practices regarding the treatment of personal information, including its collection, use, disclosure and retention, through our Web site or by various means of communication (telephone, Internet, fax or other).

GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L. collects, uses, discloses and retains various personal information in accordance with the *Civil Code of Québec* and the *Act respecting the protection of personal information in the private sector*, as well as with the laws and regulations applicable to the notarial profession and the directives issued by the Chambre des notaires du Québec, while maintaining the confidentiality of said information.

### **Our commitment**

At GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L., our activities are based on a close relationship between notaries, support staff and clients.

Our firm provides legal services, while our clients entrust us with highly confidential personal information.

It is essential for us to maintain this trust and to confirm our determination to preserve the security of personal information shared in the course of our business relationship. To this end, our firm has implemented several policies and provides ongoing training for our notaries and support staff who work with personal information.

## **What is considered a personal information?**

Personal information is information about a natural person that allows that person to be identified and that is confidential, such as, but not limited to, date of birth, social insurance number and driver's license number. With certain exceptions, they may not be communicated without the consent of the person concerned. They may be written, graphic, taped, filmed, computerized, or other.

## **Commitment to confidentiality by GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L.**

The firm of GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L. is committed to respecting privacy. In this regard, the firm takes all necessary measures to preserve the confidentiality of personal information in its possession.

By visiting or using our website and communicating with us, you consent to the collection, use, disclosure and retention of your personal information in accordance with this policy.

## **Personal information collected**

The firm of GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L. collects personal information in various contexts, such as file management, services rendered, professional meetings, applications, visits to our offices, as well as when using our Web site. Personal information comes from information you provide via forms and/or requests for information from the firm, or from information collected via documents, whether in electronic or paper form.

The firm GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L. collects only the information required for its activities and implements protective measures upon receipt of such information. In addition, it only collects information that is relevant, appropriate and limited to the purposes for which it is processed.

In particular, we collect only the information necessary to perform the tasks for which we are contracted to provide legal services.

This information is regularly updated during meetings with our notaries or the firm's staff, who provide us with any information that needs updating, as the case may be.

Personal information concerning specific individuals is confidential. In general, it cannot be shared without the consent of the person in question.

This information may include, but is not limited to:

- Name;
- Date of birth / date of death;
- Social insurance number;
- Home address;
- Telephone and fax numbers;

- E-mail addresses;
- Marital status;
- Revenues / expenses;
- Name of lawyer;
- Name of bank advisor;
- Name of financial advisor;
- Banking institution contact details;
- Medical data.

In order to create, obtain and update files, our clients must sign a consent form, which will then be added to their file.

### **Collection of personal information**

Personal information is collected as follows:

- In paper form, on the premises of the firm or its subsidiaries;
- In digital form, stored on the firm's servers on our premises or at our infrastructure host;
- In digital form on the Para-Maître software servers used by our firm in the course of our professional activities related to the services you request.

### **Purposes of processing personal information**

Personal information is collected for clear, explicit and legitimate purposes. Depending on the context, personal information may be used for the following purposes:

- File processing;
- Respond to satisfaction surveys and carry out statistical analysis to improve services and better understand clients;
- Processing applications for positions;
- Meeting legal or regulatory obligations;
- Follow up on legal services provided to improve legal advice in response to changes in the law.

It is important to underline that all personal information is processed for a specific purpose.

### **Protection of personal information**

Personal information is confidential and may only be accessed by members of the GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L. team, or by persons duly authorized by the latter. This information may be transmitted to control or inspection bodies in accordance with applicable legislation or regulations, as well as to authorized third parties.

As notaries and employees of GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L., we are authorized to access personal information, and it is essential that we fully understand the importance of preserving and protecting the confidentiality of this information. Our training clearly instills the need to use such information only for the specific purposes intended. In fact, as soon as they start work,

employees who are not subject to professional secrecy are required to sign a confidentiality agreement.

The firm GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L. takes all necessary measures to protect and secure personal information, in order to preserve its confidentiality and prevent any alteration, destruction or unauthorized disclosure to third parties.

These measures are in place for as long as is necessary for the purposes pursued in accordance with applicable legislation or regulations. However, there is no such thing as totally secure transmission or storage of information. Consequently, an absolute guarantee of the security of information transmitted or stored cannot be provided.

### **Collection of personal information via our website**

#### **a) Automatic collection**

We may automatically receive certain information when you interact with our website, email, social media or other online marketing tools.

We could, for example, find out about:

- The type of Internet browser or operating system you use;
- Your IP address;
- The pages you visit;
- The date and time you access these pages;
- The domain name of the website you just left.

Most of the information transmitted automatically between computers does not allow you to be identified.

#### **b) Use of cookies**

If your browser settings allow it, we may also store some data on your computer in the form of “cookies” or other tracking technologies.

Cookies are pieces of information stored on your computer that enable us to recognize your computer each time you visit our website. We may also use cookies to transmit content or store data (to save you having to re-enter your password, for example). If you wish, you can disable cookies by modifying your Internet browser settings. However, this setting may prevent you from making full use of all or some of our website's functionalities.

These cookies do not collect personal information about you.

### **c) Information provided by the user**

When you interact with GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L., you may provide us with personal information, for example, through an online form or by other means, such as:

- Your identity information (first or last name);
- Your contact details (address, e-mail, telephone number, etc.);
- Information relating to your professional activity (position, function, etc.), which we may use to respond to your request, manage your firm's profile on our website or process any other requests for information, if applicable.

You may also send us your information for recruitment purposes, when you apply for a position with our firm. In this case, we will only ask you for the information we need to process your application (for example, your contact details and *curriculum vitae*). We will then store your information in accordance with the policies applicable to our employees. Only authorized persons within our firm have access to this information.

We do not collect personal or confidential information from anyone under the age of 14 without the express consent of a parent or guardian.

The transmission of personal information by e-mail is not totally secure. At any time, you may contact the person responsible for your file to obtain a secure link for transmitting personal information.

### **d) Social media**

Although we prefer to avoid this type of communication for computer security reasons, we may invite you to communicate with us via websites, Facebook, plug-ins and social networking applications operated by third parties. On these platforms, you may give us access to information related to your social media account. We may use this information to validate and personalize your profile on our website.

### **External links**

Links on our website may redirect you to other external sites. Please note that this policy applies only to personal information collected and used on or through our website. We are not responsible for the content or activities of other websites accessible via the links we provide, nor for the privacy practices of third parties.

We strongly recommend that you read the privacy policy of these third parties before providing them with any personal information. However, we attach great importance to the integrity of our website and welcome your comments on external sites linked to it.

### **Disclosure of personal information**

Subject to the exceptions provided for in the *Civil Code of Québec* and the *Act respecting the protection of personal information in the private sector*, as well as the laws and regulations applicable to the notarial profession and the directives issued by the Chambre des notaires du Québec, access to your personal information is restricted to GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L.,

including members of the firm's staff and technical teams, management and administrative team, notaries and lawyers.

In the course of carrying out the mandate you have entrusted to GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES S.E.N.C.R.L., we may nevertheless transfer personal information that is not encrypted to:

- service providers, that is, third parties who provide services for our firm, such as, for example: our service providers for the platforms used to process legal files, as well as for telephone, Internet, messenger services, etc.;
- entities, organizations and authorities for legal purposes and/or file processing, such as, for example: the Québec Land Register, the Québec Register of Personal and Movable Real Rights, Corporations Canada, the Québec Enterprise Register, the Directeur de l'état civil du Québec, the Chambre des notaires du Québec, the Barreau du Québec, the governments of Quebec and Canada and their various departments, etc.; and
- parties involved in your file, such as financial institutions, real estate brokers, land surveyors, accountants and tax specialists, and other parties involved in the file.

### **Storing and destruction of personal information**

We keep your personal information only for as long as it is required to meet our legal obligations, after which it is destroyed or anonymized, but only for serious and legitimate purposes.

### **Where do we store your personal information?**

Personal information is stored as follows:

- In paper form, on the premises of the firm or its subsidiaries;
- In digital form, stored on the firm's servers on our premises or at our infrastructure host;
- In digital form on the Para-Maître software servers used by our firm in the course of our professional activities related to the services you request.

### **Privacy options**

Clients may receive a copy of this policy and our associated procedures at any time by accessing our page on our website at the following address: [http://www.pmegatineau.ca/wp-content/uploads/2023/10/politique-de-confidentialite\\_2023.pdf](http://www.pmegatineau.ca/wp-content/uploads/2023/10/politique-de-confidentialite_2023.pdf).

By sending a written request to our office located at 188, rue Montcalm, Gatineau (Québec) J8Y 3B5, or by sending an e-mail to our Privacy Officer, Mtre Jean-François Venne-Pronovost, notary ([renseignements@pmegatineau.ca](mailto:renseignements@pmegatineau.ca)), you may access your information. We will respond to your request as quickly as possible, and no later than 30 days following receipt of your request.

Our clients may revoke their consent at any time by contacting our Privacy Officer. However, it will be explained to them that failure to provide the necessary information could hinder our ability to perform the tasks for which our services are requested. In addition, GAGNÉ, ISABELLE, PATRY, LAFLAMME & ASSOCIÉS, NOTAIRES, S.E.N.C.R.L. may be required to retain certain personal information already provided, in accordance with the laws and regulations applicable to the notarial profession.

### **Modification of this policy**

We reserve the right to change this policy at any time. We will inform you of any changes by indicating the date of the last update at the beginning of this policy. It is your responsibility to visit our website to check for changes.

We strongly recommend that you read this policy so that you understand how your information will be used. Any changes to this policy will apply to personal information collected prior to the effective date of the amended policy, as well as to personal information collected on or after that date.

### **Violation of privacy**

If we believe that personal Information has been handled inappropriately, we will review this policy and make any necessary changes. If necessary, the affected individual(s) and our insurer will be notified. The Commission d'accès à l'information du Québec will be informed when required by law.

Should you wish to express concerns about our privacy procedures or report a violation of this policy, you may file a written complaint with our Privacy Officer. The Privacy Officer will contact you to obtain all relevant details.

Our Privacy Officer will then analyze the circumstances giving rise to the complaint and determine whether any adjustments need to be made to the current provisions of this policy.

### **Right of access or rectification**

You have the right to access or rectify your personal information. If you wish to access or rectify your personal information, please write to us at [renseignements@pmegatineau.ca](mailto:renseignements@pmegatineau.ca), to the attention of the Privacy Officer.

### **Questions or comments and complaints**

If you have any questions or comments about this policy or its application, please write to us at [renseignements@pmegatineau.ca](mailto:renseignements@pmegatineau.ca), to the attention of the Privacy Officer.

We undertake to reply to you as soon as possible to inform you of the measures taken or planned in response to your questions or comments.

If you wish to file a complaint, you may contact the Commission d'accès à l'information du Québec by clicking on the following link: <https://www.cai.gouv.qc.ca/a-propos/nous-joindre/>. However, we invite you to first contact the person in charge of protecting the confidentiality of personal information at our firm.

## **Act respecting the protection of personal information in the private sector**

The *Act respecting the protection of personal information in the private sector* applies to personal information that an enterprise collects, holds, uses or communicates to third parties, regardless of the medium or form in which the personal information is held.

### **Person responsible for the confidentiality of personal information:**

**Name: Mtre Jean-François Venne-Pronovost**

**Function: notary**

**Telephone: 819-771-2124, extension 320**

**Email address: renseignements@pmegatineau.ca**