PERSONAL INFORMATION GOVERNANCE POLICIES AND PRACTICES (SUMMARY)

THE ORGANIZATION'S COMMITMENT

The *Bus Carriers Federation* (hereafter the "Federation") has internal policies relating to personal information in all areas of its activities for the benefit of its members, its staff, and any member of the public who may be required to use a service of this organization.

The Federation therefore protects all personal information (hereafter "PI") entrusted to it in accordance with the Act[1] and following reasonable means with regard to its activities.

The Federation is aware that it must take specific security measures to ensure the protection of the PI collected, used, communicated, retained, or destroyed which are reasonable taking into account, particularly, its sensitivity, the purpose of its use, its quantity, its distribution, and its medium.

PRIMARY ACTIONS TAKEN BY THE FEDERATION

The policies in question apply to all staff at all hierarchical levels.

Within the framework of these policies, the Federation has, in particular:

- Determined and identified, within the context of its activities, the PI that it collects, processes, and holds;
- Determined its rights and obligations with respect to applicable PI laws;
- Determined the responsibilities of Federation staff with respect to its obligations (the most senior executive, the personal information officer, and all staff);
- Determined the life cycle of the PI that it collects, processes, and holds;
- Developed tools, examples, and forms to support staff in PI processing compliance within the Federation;
- Established a process for handling requests, complaints, and reports relating to PI;
- Established clear expectations for staff regarding PI.

[1] Bill 64 - Assented (2021, chapter 25) (gouv.qc.ca), hereafter the "Act"

CONSENT WHEN COLLECTING PERSONAL INFORMATION

In accordance with the Act and established procedures, the Federation collects the consent of the persons targeted by the collection of any PI which proves necessary in the context of its activities—in other words, for all files, regardless of whether they are sensitive[2] or not.

When PI is collected online, the necessary statements are also included there.

For the purposes of applying the Act, the Federation hereby confirms that it does not make decisions based exclusively on the automated processing of PI.

For the purposes of applying the Act, the Federation hereby confirms that it does not use identification, localization, or profiling technology.

For the purposes of applying the Act, the Federation hereby confirms that it does not hire staff under the age of 14.

For the purposes of applying the Act, the Federation hereby confirms that it does not communicate PI outside of Quebec, following verification with our suppliers.

For the purposes of applying the Act, the Federation hereby confirms that it does not establish a bank of characteristics or biometric measurements.

The personal information collected and held by the Federation is considered confidential and part of the private lives of the individuals who consent to its disclosure.

HANDLING OF REQUESTS, COMPLAINTS, AND REPORTS

Any request, complaint, or report regarding PI must be made to the PI Officer within the Federation **in writing**. The contact information for the officer is published on the Federation website, but it can also be found below:

Me Christine Deslauriers, Director of Legal Affairs and Corporate Secretary
Extension 209, juridique@federationautobus.com

The PI officer will follow up on requests, complaints, disagreements, and reports in accordance with the Act.

Any person with the required interest is therefore invited, if necessary, to use the forms available from the PI officer, primarily:

- Request for communication/file consultation/rectification;
- Request for the withdrawal of the consent given;

[2] Personal information is considered sensitive when, by its medical, biometric, or otherwise private nature or due to the context of its use or communication, it generates a high degree of reasonable expectation of privacy.

- Request for deindexing, reindexing, or dissemination;

- Request for the bereavement process.[3].

Please note that you can also request to be informed of the categories of people who have access to your file within the company as well as the retention period of your PI.

Please also note that at all times and if necessary, legal recourse is available to you under the Act, particularly in the event of a disagreement. For all the details, we refer you to sections 41.1 et seq. of the *Act Respecting the Protection of Personal Information in the Private Sector*[4].

BASIC OBLIGATIONS (REMINDER)

- Any person operating a business who, due to a serious and legitimate interest, may create a file on another person must, when creating the file, register its purpose. This registration is part of the file;

- Any person operating a business must ensure that the files that they hold on another person are up to date and accurate when using them to make a decision relating to the person in question;

- Using the information contained in a file is only permitted, once the purpose of the file has been fulfilled, with the consent of the person in question, subject to the time limit provided for by the Act or by regulation;

- The person who collects PI to create a file on another person or records such information there must only collect the information necessary for the purpose of the file. This information must be collected through lawful means;

- **Unless otherwise** provided for by the Act, the person who collects PI on another person must collect it from the person in question, unless the latter consents to collection from third parties;

- The person who collects PI on another person must inform them of the purpose of the file and their rights under the Act;

[3] In case of death, if you do not want the Federation to grant access rights to your information to your loved ones in the context of a bereavement process, request the relevant form from the Personal Information Officer to express your refusal.

[4] p-39.1 - Act Respecting the Protection of Personal Information in the Private Sector (gouv.qc.ca)

- No one may communicate the PI contained in a file that they hold on another person to a third party or use it for purposes not relevant to the purpose of the file **unless** the person in question consents to this or the Act provides for it;

- Any person operating a business must take specific security measures to ensure the protection of the PI collected, used, communicated, retained, or destroyed which are reasonable taking into account, particularly, its sensitivity, the purpose of its use, its quantity, its distribution, and its medium;

- The Federation must destroy the PI that it holds when the purposes for which it was collected or used have been fulfilled, **subject** to a retention period provided for by any law.

Given that the Federation may create files as part of its duties and may also be required to collect PI, it must follow these guidelines.

The PI Officer remains available to assist any person who requests it in relation to the subject of this document.