

PRIVACY AND ACCESS TO INFORMATION POLICY 2024-2027



This is a translation of the original French document. In case of divergence of interpretation, the French text shall prevail over the English text.

1. Scope of Application

- 1.1. This Privacy and Access to Information Policy (hereinafter the "**Policy**") takes into account all the requirements of the *Act respecting the protection of personal information in the private sector* (RLRQ, c. P-39.1) (hereinafter the "**Act**"), as it may be amended, repealed or replaced by the Government of Québec.
- 1.2. The Policy describes the practices and commitments of the Québec Golf Federation (hereinafter "**Golf Québec**") concerning the use of personal information that it collects, holds, uses or communicates in order to carry out its activities. The Policy also applies to any person browsing the Golf Québec website, <https://www.golfquebec.org> (hereinafter the "**Website**").

2. What Is Personal Information?

- 2.1. Personal information is information about a natural person that enables that person to be identified, directly or indirectly.
- 2.2. For the purposes of the Act, personal information does not include a natural person's professional information, such as name, title, position, business address, e-mail address or workplace telephone number. Also, personal information does not include information that has been duly anonymized or aggregated, in accordance with the provisions of the Act, and that can no longer be used to identify a natural person.

3. Consent

- 3.1. Unless authorized by the Act, no personal information will be collected, used or disclosed without the prior written or verbal consent of the person concerned by the collection, use and disclosure of such information.
- 3.2. Unless authorized by the Act, Golf Québec does not solicit or knowingly collect any personal information directly from a minor under the age of fourteen (14). If Golf Québec needs to collect personal information from a minor under the age of fourteen (14), the authorization of the parent or guardian will be required.
- 3.3. Golf Québec may, however, require the consent of the individual, or the individual's parent or guardian, as the case may be, to use and disclose the individual's personal information after collection in the event that Golf Québec wishes to use the individual's personal information for a purpose not identified in the Policy or for which consent has not been obtained.
- 3.4. If the member or other person concerned refuses to give consent, then Golf Québec will use his or her personal information solely for the purpose of communicating with

him or her and shall not disclose such personal information to any other person. In the event that a member or other person concerned does not indicate whether or not he or she consents, the fact that he or she voluntarily provides his or her personal information constitutes his or her consent to the use of his or her personal information for the purpose disclosed to him or her.

4. Collection of Personal Information

4.1. Golf Québec collects the personal information listed below via its website for the following purposes:

4.1.1. **Newsletter subscription:** first name, last name, postal address, e-mail address, gender, age group, date of birth, preferred language, and regional association affiliation status.

4.1.2. **Application to volunteer:** first name, last name, date of birth, type of affiliation, e-mail address, home address, telephone number, emergency contacts including relationship and telephone number, letter of recommendation, and photo.

4.1.3. **Communication with members:** first name, last name, and e-mail address.

4.2. The use of personal information collected by Golf Québec is limited to the purposes described in the Policy and authorized by the Act.

4.3. Golf Québec may also collect personal information about you from third parties as authorized by the Act, in particular from Golf Canada as part of your membership with Golf Québec or from *SportsQuébec* as part of the Placement Sports et Loisirs program.

5. Commercial and Philanthropic Prospecting

5.1. Golf Québec may use your first name, last name, and e-mail address to send you promotional offers from its various business partners if you have chosen to receive this information.

5.2. Following a donation to Golf Québec by an individual, Golf Québec may use your last name, first name, e-mail address, and the amount of your donation to send you an e-mail thanking you and inviting you to make another donation to Golf Québec programs.

5.3. As part of its commercial and philanthropic prospecting activities, Golf Québec will indicate, in all of its communications, the possibility for an individual to withdraw his or her consent to the use of his or her personal information for these purposes.

6. Who Has Access to Personal Information Held by Golf Québec?

6.1. All personal information is kept by Golf Québec under the seal of confidentiality and, except as provided below, personal information may not be disclosed to anyone unless expressly authorized by the individual to whom the information relates.

6.2. As a general rule, only persons duly identified by Golf Québec, i.e., staff members, are authorized to access personal information held by Golf Québec.

6.3. It is possible, however, that other legal entities or individuals may have access to some or all of the personal information concerning an individual or his or her child:

6.3.1. Golf Québec's insurer, for insurance purposes.

6.3.2. Golf Québec volunteers, for event purposes.

6.3.3. Any service provider with whom Golf Québec has a service agreement and for whom the transmission of personal information is necessary to complete the mandate entrusted to this service provider.

6.4 Golf Québec may also use and disclose the personal information of an individual or his or her child that it holds, where it is of the opinion that such use or disclosure is authorized, necessary and appropriate, and in accordance with the following parameters:

6.4.1. In accordance with the provisions of the Act.

6.4.2. To comply with legal proceedings.

6.4.3. To respect its contractual agreements.

6.4.4. To protect Golf Québec's rights, security, or property, yours or those of others.

6.4.5. To enable it to exercise available remedies or limit the damages that Golf Québec may suffer.

6.5 In the event that Golf Québec discloses personal information without the consent of the person concerned, it will only disclose personal information that is necessary for the purpose of the disclosure.

7. Accuracy and Retention Period of Personal Information

7.1. Golf Québec will ensure that any personal information in its possession is accurate, current and complete for the purposes for which Golf Québec uses such personal information. If Golf Québec discovers that the information is inaccurate, incomplete, or out of date, it will contact the individual to update the personal information and, if necessary, ensure that third parties to whom the inaccurate information has been provided can also correct their records.

7.2. Personal information collected by Golf Québec may be used as long as the consent of an individual with respect to such personal information is valid.

7.3. Personal information provided to Golf Québec is kept only as long as necessary for the purposes for which it was collected.

7.4. However, if an individual withdraws his or her consent, or if the individual's consent expires, Golf Québec may still retain the individual's personal information, without using it, in accordance with the retention schedule established by Golf Québec in accordance with the law and its needs. In accordance with this retention schedule, Golf Québec will ensure that an individual's personal information is destroyed, deleted, erased, or converted to an anonymous form.

8. Protection of Personal Information (Security Measures)

8.1. Golf Québec is committed to maintaining an adequate level of physical, procedural, and technical security in its offices and premises reserved for the storage of personal information to prevent, to the extent possible, any unauthorized form of access, disclosure, reproduction, use, or modification of the personal information it holds. This principle also applies to the way Golf Québec destroys personal information.

8.2. Golf Québec regularly verifies safety procedures and measures.

9. Presence of Cookies on the Website

9.1. You may visit the Golf Québec Website at any time anonymously, i.e., without revealing any personal information about yourself.

9.2. When you connect to the Website, Golf Québec's server uses cookies to identify the IP address of your tablet, computer, or mobile device so that data can be exchanged and Golf Québec can compile statistics on the number of visitors to its Website. Please understand that no personal information is linked to your IP address.

9.3. The Golf Québec Website uses the following cookies:

9.3.1. Google Analytics cookies. These cookies are used to collect information about how people navigate the Website. The information compiled is then used to create reports and to help Golf Québec improve its Website. Cookies collect information in anonymous forms, including the number of visitors to the Website, where they came from before browsing the Website and the pages they visited immediately prior to browsing the Website. If this is not convenient for the user of the Golf Québec Website, he or she may deactivate Google Analytics tracking by visiting the following address:
<https://tools.google.com/dlpage/gaoptout?hl=fr>.

9.3.2. Facebook Pixel cookies. These cookies are extracts of code that have been added to the Golf Québec Website to enable it to measure the effectiveness of its advertising campaigns, to stimulate sales, and to distribute its advertisements to the appropriate people by tracking the actions taken by users on its Website.

9.4. With the help of the cookie banner on the home page of the Website, any person browsing the Golf Québec Website will be able to customize the use of cookies while browsing the Website.

9.5. All persons must understand that by refusing the collection of data through cookies, it is possible that certain functionalities of the Golf Québec Website may not be accessible.

10. Links to External Websites

10.1. The Website may contain links to external sites, in particular to the websites of its partners and sponsors or its social networks. These sites are not covered by the Policy. Personal information that an individual discloses on these external websites will be subject to the privacy policy of the external website, if any.

- 10.2. More specifically, when a hyperlink on the Golf Québec site redirects a person to the Golf Canada site, in particular for membership purposes or to find a nearby golf course, the personal information provided on this site will be subject to the Golf Canada privacy policy, if it exists, and not to that of Golf Québec.
- 10.3. Also, when a person wishes to make a donation to Golf Québec via the Website, he or she is automatically redirected to the online donation website <https://www.jedonneenligne.org/sportsquebec/PLSPGOLF/>, which belongs to Logilyf Inc. but is made available to Golf Québec for the purposes of the Placements Sports et Loisir program. The use of this Website by an individual is then subject to all the conditions and policies set forth by Logilyf Inc. and not those of Golf Québec.
- 10.4. Golf Québec is not responsible for the privacy policies adopted and implemented by third parties, as each must respect the laws and regulations in force in its country of residence. Before providing any personal information, Golf Québec strongly recommends that you read the privacy policies posted on these sites to understand how your personal information will be collected, stored, used, or disclosed.

11. Withdrawal of Consent

- 11.1. Any individual may withhold or withdraw consent to the collection, use, and disclosure of personal information about him or her or his or her child. However, depending on the circumstances, withdrawing consent may prevent Golf Québec from providing the products and/or services for which the individual or his or her child is registered, from properly evaluating and processing the individual's request or even from communicating with the individual.

12. Access to and Correction of Personal Information

- 12.1. Golf Québec authorizes any person to access the personal information it holds on that person.
- 12.2. In the event that an individual believes that personal information held by Golf Québec concerning him or her or his or her minor child is inaccurate or incomplete, the individual may also contact Golf Québec to have the personal information corrected.
- 12.3. Any request for access or correction of personal information concerning an individual must be made in writing to the person responsible for the protection of personal information. Golf Québec will respond to the request within thirty (30) days of receipt. If Golf Québec refuses the request, the person responsible for the protection of personal information will send the person who sent the request the legal reasons justifying the refusal. Golf Québec will also inform the individual of his or her recourse under the Act and the time limits within which they may be exercised.

13. Complaint

- 13.1. To maintain and improve the quality of its services, Golf Québec offers individuals the opportunity to express their dissatisfaction with the measures it takes to protect the personal information it collects, holds, uses, or communicates. Anyone wishing to lodge a complaint should contact the person responsible for the protection of personal

information in writing.

13.2. All complaints must contain at least the following information:

13.2.1. Full name of the person filing the complaint.

13.2.2. The telephone number, postal address or e-mail address of the person filing the complaint.

13.2.3. A description of the reasons for the complaint.

13.3. All complaints will be treated confidentially by Golf Québec.

13.4. Within five (5) days of receiving the complaint, Golf Québec will send an acknowledgement of receipt to the person who filed the complaint. A response to the complaint will be sent to the person who filed the complaint within thirty (30) days of receipt of the complaint by Golf Québec.

14. Person Responsible for the Protection of Personal Information (RPRP)

14.1. The Executive Director of Golf Québec is responsible for the protection of personal information.

14.2. For further information or if you have any questions regarding the processing or updating of your personal information, you may contact the RPRP by one of the following methods.

14.2.1. By e-mail: pbeaulieu@golfquebec.org

14.2.2. By phone: 514 252-3345, ext. 3732

14.2.3. By mail:

Québec Golf Federation
7665, Lacordaire Blvd., 3rd floor
Montréal (QC) H1S 2A7

14.3. The RPRP will contact you within thirty (30) days of receiving your request.

15. Effective

15.1 The Policy comes into effect upon adoption by Golf Québec's Board of Directors.