



Personal Information Governance Rules

PREAMBLE

In September 2021, the Quebec National Assembly adopted the Act to modernize legislative provisions respecting the protection of personal information ("Bill 25"). This Act introduces significant changes and additions to the legal framework applicable to private educational institutions, particularly concerning the collection, use, communication to third parties, retention, and security of personal information.

These new obligations concern both the personal information of students and their parents (holders of parental authority or guardians), as well as that of employees and various partners of private educational establishments.

One of the requirements of Bill 25 is that private educational institutions must demonstrate transparency and adopt governance rules concerning the management of the personal information they hold, even when this management is entrusted to a third party.

This requirement comes into effect on September 22, 2023, and is incorporated into both the Act respecting access to documents held by public bodies and the protection of personal information, and the Act respecting the protection of personal information in the private sector.

The governance rules must enable Centennial Academy staff to understand and apply legal requirements and privacy principles in the performance of their duties.

Source: GOVERNMENT OF QUEBEC Rules governing the governance of personal information

SCOPE AND LEGAL FRAMEWORK

Centennial Academy collects personal information, particularly that of students and staff members. As a result, it is subject to the provisions of the Access Act, the Privacy Act, the Civil Code of Quebec, and the Charter of Human Rights and Freedoms. In the event of any discrepancy between the Access Act, the Privacy Act, and this guide, these laws shall prevail. This guide applies to any person who, in the performance of their duties, collects, consults, uses, communicates, holds, or retains personal information held by the Academy concerning any individual.

COLLECTION OF PERSONAL INFORMATION

Personal Information That May Be Collected: To fulfill its mission, the Academy must collect various types of personal information. It collects only the information required to carry out its duties or to implement a program for which it is responsible. It may also collect personal information if it is required to implement a program of a public



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organization with which it collaborates. In such cases, the collection must be preceded by a privacy impact assessment and carried out within the framework of a written agreement submitted to the Commission d'accès à l'information du Québec, in accordance with the Access Act. Centennial Academy ensures that the personal information collected is adequate, relevant, not excessive, and used for limited purposes.

Centennial Academy collects the personal information required for its activities, including:

- Name
- Address
- E-mail address
- Social insurance number
- School records
- Student diagnoses
- Intervention plans
- Phone number
- Gender
- Age
- Tax information
- Demographic information
- Banking information
- Website usage information
- Employee information: curriculum vitae, diplomas, evaluations, disciplinary measures, etc.

The data collected is used for:

- Parent and student identification
- Student admission and registration
- Procurement of supplies
- Service delivery
- Communication
- Employee file management
- Issuance of tax receipts

Information Communicated When Collecting Personal Information: When collecting personal information, the Academy informs the person concerned, no later than at the time of collection:

1. The name of the person for whom the information is being collected;
2. The purpose of the collection;
3. The means of collection;
4. Whether the request is mandatory or optional;
5. The consequences of a refusal to answer or consent;



6. Legal rights of access and rectification;
7. The possibility of communicating information outside Quebec, if applicable.

Upon request, the person concerned is also informed of the information collected, the categories of persons having access to this information within the organization, the length of time this information is kept, and the contact details of the person responsible for the protection of personal information.

USE OF PERSONAL INFORMATION

The Academy uses personal information about its students, staff, and other third parties to carry out its missions and functions. It will not use this information for purposes other than those identified at the time of collection, except with your express consent or as required by the Access Act or the Act respecting private education.

CONSENT

When necessary, the Academy requests consent for the collection, use, or disclosure of personal information. Such consent must be explicit, free, informed, given for specific purposes, in clear and simple terms, and for the duration necessary to achieve the objectives for which it was requested. A person may withdraw consent at any time by contacting by e-mail the person indicated on the consent form. Withdrawal of consent may make it impossible to provide certain services.

HANDLING COMPLAINTS

In the course of their academic or professional career, students, parents, or employees may file a complaint or request access to their personal information.

At Centennial Academy, the person responsible for handling complaints is Angela Burgos, General Manager.

Here is the procedure for handling complaints:

1. The complaint must be sent by e-mail to the Privacy Officer (direction@centennial.qc.ca). If a complaint is received by another person in the organization, it must be forwarded immediately to the Privacy Officer.
2. The Privacy Officer will acknowledge receipt and respond within 20 days (with a possible extension of 10 days depending on the situation). During this period, they will review the complaint, investigate the circumstances, and respond in writing to the complainant. Recommendations for improving the protection of personal information may be made where appropriate.
3. The incident will be recorded in the register and reported to management if necessary.



RETENTION AND DESTRUCTION

At Centennial Academy, we attach great importance to the retention and destruction of personal information, in accordance with the provisions of the Act respecting access to documents held by public bodies and the protection of personal information and the Private Sector Act.

Once the purposes for which personal information was collected or used have been achieved, we undertake to destroy or anonymize it, unless otherwise specified by law for specific retention periods.

In this regard, we refer to the *Guide de gestion des archives à l'intention des établissements d'enseignement privés du Québec*, prepared by the Fédération des établissements d'enseignement privés and sent to Bibliothèques et Archives nationales (February 2016), as well as to the recommendations of the Commission d'accès à l'information.

Reference:

- *Guide de gestion des archives à l'intention des établissements d'enseignement privés du Québec* (French only)

INCIDENT MANAGEMENT

At Centennial Academy, in the event of a privacy incident, we comply with applicable laws and undertake to:

- Record the incident in the dedicated register.
- Assess the potential risks to privacy and/or identity theft.
- Inform the Commission d'accès à l'information and the persons concerned if the incident presents a risk of serious harm.

We have put in place a security response plan, including for confidentiality incidents. This plan includes a description of the incident, the training of the incident response team, and the steps to be taken to manage the incident.

If you are the victim of a security or confidentiality incident, please contact the person responsible in writing at the following address: direction@centennial.qc.ca

With speed and discretion, Centennial Academy reserves the right to consult members of the Bill 25 Committee or to seek legal advice from a law firm or the Commission d'accès à l'information, if necessary.



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