

# PRIVACY POLICY

Latest update: September 15<sup>th</sup> 2023

Safeguarding your privacy is of the utmost importance for Passages Marketing Inc.

The present confidentiality policy details:

- How your personal data is gathered and processed. All information that could likely identify you is considered to be personal information. This includes, notably, your given name and family name, your age, your postal address, your e-mail address, your location, or even your IP address;
- Your rights regarding this information;
- Who is responsible for managing personal data that has been gathered and processed;
- Who receives a transmission of this information;
- Eventually, the website's cookie policy.

## 1. GATHERING OF PERSONAL DATA

During the process of completing surveys on the Passages Marketing site, the following personal information might be requested:

- Postal code
- Web address
- Telephone / fax number
- Gender
- Age / birthdate
- Ethnic origins / nationality
- Education / training
- Profession
- Income / financial resources
- Preferences (musical, literary, cinematographic, etc.)
- Physical description
- Familial situation / marital status
- Consumption habits (depending on a given survey's subject matter)
- Behavioural habits (depending on a given survey's subject matter)

All personal data that we gather are submitted to us using the methods described below, in the section titled "Data Gathering Forms and Methods" and in subsequent sections.

## 2. DATA GATHERING FORMS AND METHODS

Your personal data are gathered using the following methods:

- Opinion surveys

We use the gathered data for the following ends:

- Statistics
- Website management

## 3. LOG JOURNALS & COOKIES

We gather certain types of information using log files and cookies. These files allow us to process statistics and information about web traffic, facilitate site navigation, and improve service for your increased comfort.

### a) Cookie types

Cookies can be grouped into 4 categories. Though Passages exclusively uses "essential" cookies, below is a definition of each cookie type.

#### ***Essential cookies:***

These cookies enable the proper functioning of a website being visited. Though they remain invisible to respondents, website navigation could become laborious or even impossible without them.

#### ***Functional cookies:***

These cookies allow a website to store your preferences and choices when you visit, with the goal of saving you the trouble of having to reset them on subsequent visits.

#### ***Performance and tracking cookies:***

These cookies allow SEO and communications agencies to correlate a website's content relevance with the behaviours of the site's visitors: number of visits, most frequently-viewed pages, peak traffic, ad campaign transformation rate, etc...

#### ***Targeted advertising cookies:***

These cookies store information about an individual's use of a website and enable targeted promotional activities. **Passages does not and will never use this type of cookie.**

## **b) Description of cookies used by the site**

This shall primarily include the following types of information:

- IP address
- Operating system
- Connection date and time
- Consumption habits (depending on a given survey's subject matter)
- Behavioural habits (depending on a given survey's subject matter)

The use of these files enables us to attain the following objectives:

- Improve the site's service and personalised welcome
- Create custom consumption profiles
- Perform statistical studies

When using the site, third-party cookies might be stored. In particular, the following third party:

Google Analytics (<https://policies.google.com/privacy?hl=en-CA>)

Third party sites maintain their own privacy policies and general conditions for use that may differ from those that apply to our own site. Please consult the privacy policies and general conditions for use applicable to those sites.

If so required, our website can also make use of cookies stored by the companies for which we are conducting studies. These files serve primarily to gather information about respondents' consumption habits. Passages Marketing Inc. will in no way be able to employ this information to identify individual respondents.

## **c) Opposition to the use of cookies by the site**

You may decline to store cookies by configuring your web browser.

In the event that you do decide to deactivate cookie functionality, you can nevertheless continue using the site. However, any site malfunction resulting from this type of configuration manipulation cannot be considered to be our responsibility.

#### **4. SHARING OF PERSONAL DATA**

We are committed to never commercialising or selling gathered personal information to third parties. Nevertheless, it is possible that we may share this information with third parties in either of the following contexts:

- Establishing consumption patterns
- Partnership

If you do not wish for your personal information to be shared with any third parties, you may oppose such use at the moment of data gathering or at any subsequent time, as detailed in the section titled "Withdrawal & Opposition Rights".

#### **5. DURATION OF PERSONAL DATA STORAGE**

The party responsible for processing personal data will store all gathered personal data in the website's computer systems, under reasonable security conditions and for as long as necessary in order to provide you with its services smoothly and in accordance with applicable law. However, this information will be destroyed 3 months after the end of its use.

#### **6. STORING OF PERSONAL DATA**

Our site is hosted by: LeaseWeb, the headquarters of which is located at the following address:

500-14 Place du Commerce, Ile des Soeurs, Quebec, Canada H3E 1T5

The web host can be contacted at the following number: 1-888-909-4932.

All information that we gather and process is stored and managed exclusively in Canada.

#### **7. PARTIES RESPONSIBLE FOR PROCESSING PERSONAL DATA**

##### **a) The individual responsible for processing personal information**

The individual responsible for processing personal information is: Pierre Descarie. He can be contacted as follows:

The individual responsible for processing personal information can be contacted by mail at the following address: 1911 Des Prunelliers, Longueuil, QC, J4N 0A6

The individual responsible for processing personal information is charged with determining the ends and means applicable to the processing of personal data.

## **b) Obligations of the individual responsible for processing personal information**

The individual responsible for processing personal information is committed to safeguarding gathered personal data, to never submit such data to any third parties without your prior knowledge, and to respect the purpose for which this information has been gathered.

Moreover, the individual responsible for processing personal information is committed to notifying you in the event of any modification or deletion of stored personal information, unless such action entails disproportionate paperwork, expenses, or procedures.

In the event that the integrity, confidentiality, or security of your personal information is compromised, the individual responsible for processing personal information is committed to informing you by any means available.

## **8. WITHDRAWAL & OPPOSITION RIGHTS**

You have the right to oppose the processing of your personal information via the site ("opposition rights"). You are also within your rights to demand the deletion of your personal information, such as from mailing lists, for example ("withdrawal rights").

In order to submit an opposition to the processing of your personal data or to request the deletion of your personal information, you must do so via the following procedure:

Submit your request by mail to the individual responsible for processing personal information at the address listed at point 7.

## **9. ACCESS, RECTIFICATION, AND DELETION RIGHTS**

You may review, update, modify, or request the deletion of your personal information via the following procedure:

Submit your request by mail to the individual responsible for processing personal information at the address listed at point 7.

## **10. SECURITY**

Personal information that we gather is stored on a secure server. Individuals under our employ are required to respect the confidentiality of your information.

To ensure the security of your personal information, we employ the following security measures:

- SSL (Secure Sockets Layer) Protocol
- Access management – authorised individuals
- Network surveillance software
- Automated backup
- Digital certificate development
- Username / password
- Firewalls

We are committed to maintaining a high level of confidentiality through the application of the latest technological innovations, which enable us to ensure the confidentiality of your transactions. Nevertheless, as no individual mechanism can provide complete security, a certain degree of risk will always be inherently present when using the Internet to transmit personal data.

## **11. PRIVACY POLICY AMENDMENT CONDITIONS**

The present privacy policy can be consulted at any time at the following address:

[https://s2.passagesmarketing.com/public/\\_global\\_doc/conditions\\_en.pdf](https://s2.passagesmarketing.com/public/_global_doc/conditions_en.pdf)

We reserve the right to modify this policy in order to ensure its continued compliance with current applicable law.

Consequently, you are invited to regularly consult this privacy policy in order to stay up to date with its most recent applicable changes.

## **12. PRIVACY POLICY ACCEPTANCE**

By using this website, you acknowledge that you have read and fully understood the present privacy policy, and agree to its conditions, more specifically as they relate to the gathering and processing of your personal information, as well as to the use of cookies.

### **13. LEGISLATION**

We are committed to respecting the legislative provisions detailed in:

*Loi sur la protection des renseignements personnels dans le secteur privé*, RLRQ c P-39.1 ; et/ou

*Loi sur la protection des renseignements personnels et les documents électroniques*, LC 2000, c 5.

### **~~14. STATEMENT OF CONSENT~~**

~~By continuing to use this site, you consent to the use of cookies and other similar technologies.~~