

## PRIVACY POLICY

### PREAMBLE

Épargne Placements Québec's Privacy Policy (the Policy) is adopted pursuant to the *Act to modernize legislative provisions as regards the protection of personal information* (2021, chapter 25), which modernizes the framework applicable to the protection of personal information in various Québec acts, including the *Act respecting Access to documents held by public bodies and the Protection of personal information* (CQLR, chapter A-2.1) and the *Act respecting the protection of personal information in the private sector* (CQLR, chapter P-39.1).

As an administrative unit of the Ministère des Finances, Épargne Placements Québec is subject to the *Act respecting Access to documents held by public bodies and the Protection of personal information* and must comply with the new applicable framework.

The Policy reflects Épargne Placements Québec's desire to uphold a trusting relationship with its members. It is consistent with the commitments made in the Service Statement aimed at ensuring the discretion and confidentiality of personal information for its intended use.

The Policy is available at <https://epq.gouv.qc.ca/>.

Épargne Placements Québec may change this Policy in the future. If so, participants will be informed by a notice on the informational website, by email and through a message in their quarterly portfolio statement.

### OBJECTIVES

The Policy aims to define the governance of personal information collected and retained by Épargne Placements Québec in the course of its activities.

In particular, the Policy aims to:

- protect personal information by clearly identifying the data collected, its purpose and the security measures implemented;
- comply with legal obligations regarding the protection of personal information, and act in a transparent and responsible manner in the collection, use and retention of personal information;
- designate the person responsible for the application of the Policy.

### SCOPE

The Policy applies to:

- employees of Épargne Placements Québec;
- any individual or legal entity with whom Épargne Placements Québec has a service or supply contract.

### PERSON RESPONSIBLE FOR THE APPLICATION OF THE POLICY

The person responsible for the protection of personal information at Épargne Placements Québec is in charge of the application of the Policy and its periodic review. The person in charge must take all necessary measures to respond to and follow up on any complaints received on this subject.

COLLECTION OF PERSONAL INFORMATION

Épargne Placements Québec restricts the collection of personal information to that which is necessary to provide quality service, while respecting its commitment regarding privacy and information security. The personal information collected may be used to identify participants, confirm their identity, or determine their eligibility for Épargne Placements Québec products; it may also be used for quality control purposes.

Identification information	<ul style="list-style-type: none"><li>• First and last name</li><li>• Date of birth</li><li>• Mailing address</li><li>• Phone number (home, office, or cell)</li><li>• Email address</li><li>• Social insurance number</li><li>• Mother’s name at birth</li><li>• Participant number</li><li>• Information that Épargne Placements Québec holds on the participant as an authorized sales agent</li></ul>
Authentication information	<ul style="list-style-type: none"><li>• Telephone identification number</li><li>• Transactional website (Online transactions) username and password</li><li>• Information on the participant’s accounts and transactions</li></ul>
Other information	<ul style="list-style-type: none"><li>• Banking information</li><li>• Language and communication preferences (mail or electronic)</li><li>• Information about individuals other than the participant (power of attorney for the participant’s spouse or common-law partner under a registered plan and any representative duly authorized to carry out transactions)*</li></ul>
Information collected for training or quality control purposes, or to retain the participant’s consent to a transaction	<ul style="list-style-type: none"><li>• History of telephone calls, written communications, and emails</li><li>• History of visits to Online transactions, the transactional website</li></ul>
Information on digital interactions	<p>When using online services and in accordance with Épargne Placements Québec’s <i>Declaration on the Use of Cookies</i>, information is automatically exchanged between the user’s computer and Épargne Placements Québec’s servers. This information may include:</p> <ul style="list-style-type: none"><li>• Internet service provider domain name and IP address;</li><li>• the computer’s unique browser number;</li><li>• the type of browser and operating system used to access Épargne Placements Québec’s digital platforms;</li><li>• the pages visited;</li><li>• the date and time these pages are visited;</li><li>• the address of the site from which the user accessed Épargne Placements Québec’s digital platforms.</li></ul>

\* If the participant provides information about another individual, Épargne Placements Québec will assume that the participant is authorized to do so and has obtained that individual’s consent to the collection, use or disclosure of the information for the purposes set out in this Policy.

REASONS FOR USING PARTICIPANTS’ PERSONAL INFORMATION

Épargne Placements Québec collects participants’ personal information mainly when accounts are opened. This can be done through Online transactions, the transactional website, or through the call centre.

Épargne Placements Québec uses participants’ information to:

- identify participants and update their information;
- assess participants’ eligibility for products and services;
- administer the requested products and services;
- carry out day-to-day transactions related to the products held;
- communicate with participants by mail, email or phone;
- promote products and services that may appeal to participants:
  - Épargne Placements Québec communicates with participants by email (including newsletters) or by phone;
- promote online services;

- evaluate the quality of its services in order to meet its obligations under the *Public Administration Act* (CQLR, chapter A-6.001);
- conduct research and data analysis to produce statistics, improve products and services or develop new ones;
- personalize participants' experience, in particular by analyzing their profile or transactions and by using other types of information to:
  - better know them and understand their needs;
  - target and personalize products, services and promotions that may appeal to them;
  - better inform them through observations on their needs and preferences;
- prevent, detect and control fraud as well as unauthorized or illegal activities (money laundering, cyber threats);
- manage risks and comply with applicable laws and regulations;
- use and disclose certain pieces of information as authorized by law.

When Épargne Placements Québec uses information, it takes reasonable measures to limit the risk of someone identifying the participant. No personal information is disclosed in communications. In addition, for security reasons, Épargne Placements Québec does not include any link to the participant's account on Online transactions, the transactional website, nor to the web address of the participant's financial institution.

### ***Method of collecting participants' personal information***

Épargne Placements Québec collects participants' personal information:

- directly from them when they communicate with Épargne Placements Québec by phone or interact on Online transactions, the transactional website;
- through the content generated when they browse the transactional website;
- when they post comments on Épargne Placements Québec's social media accounts or communicate with Épargne Placements Québec through its personalized social media messaging.

### ***Personnel with access to personal information***

Épargne Placements Québec restricts access to personal information to ensure its confidentiality and safety. Only authorized personnel who require access to personal information in the course of their duties are authorized to do so.

### ***Sharing personal information***

At all times, Épargne Placements Québec is committed to limiting the use and disclosure of participants' information to the strict minimum necessary and to obtaining the participants' consent when necessary.

It may be necessary to share participants' information with others for legitimate purposes. For example, sharing information may be required by law or necessary to protect participants' interests in the event of fraud.

Épargne Placements Québec ensures the integrity, security, and confidentiality of its participants' information. Under no circumstances does Épargne Placements Québec sell or provide its client lists to third parties for marketing purposes.

Épargne Placements Québec discloses participants' information to:

- service providers with whom it does business to carry out certain operations like the production of participants' portfolio statements;
- individuals acting for or at the request of participants, such as authorized sales agents;
- duly authorized representatives (such as a guardian, proxy, estate representative or lawyer);
- the National Bank of Canada in the case of an application for an RRSP loan managed by this institution;
- third parties, if they need to disclose participants' personal information as part of legal proceedings;
- a regulatory or governmental authority.

## **Service providers**

When Épargne Placements Québec requires the services of a provider, only the personal information needed is disclosed to the provider. In addition, a confidentiality agreement is entered into with the provider, and rules for the disposal of information are established.

## **CONSENT**

### ***Giving consent***

Several pieces of information are essential for Épargne Placements Québec to provide its products and services to participants. Refusing to provide this information may make it difficult, if not impossible, to establish or maintain a business relationship. For example, if the social insurance number (SIN) is not provided, Épargne Placements Québec will not be able to offer products to a participant, such as an RRSP, which requires the SIN for tax purposes.

As such, when an individual becomes a participant, they must consent to the collection, use and disclosure of their personal information by Épargne Placements Québec for the purpose of managing their product portfolio.

In particular, Épargne Placements Québec must obtain the consent of participants to:

- inform them of promotions on its products;
- evaluate the quality of its services through consultations.

Participant consent may be given electronically or by phone. Épargne Placements Québec does not need to obtain the participant's consent in certain situations, in particular if consent is needed to:

- comply with a court order or another demand by a regulatory or governmental authority;
- prevent, stop, or detect fraud.

### ***Withdrawing consent***

Participants may withdraw their consent at any time and refuse to allow Épargne Placements Québec to use their information to send them promotional offers, invite them to participate in a consultation or to allow them to give feedback regarding the products and services it provides.

Participants may modify their consent by accessing the "Profile" section of Online transactions, the transactional website, or by contacting Épargne Placements Québec's call centre at 1-800-463-5229.

To stop receiving newsletters by email, participants can click on the unsubscribe link included in all communications by Épargne Placements Québec. There may be a delay before participants stop receiving promotional offers, particularly those relating to a promotional campaign that is underway.

Participants who stop receiving Épargne Placements Québec's communications regarding its promotions or invitations to participate in consultations will continue to receive:

- messages included in quarterly portfolio statements;
- the various email alerts to which they are subscribed;
- any information about transactions that they have carried out or that enable the sound management of their portfolio;
- communications on changes to Épargne Placements Québec's policies, processes, products, and services.

Participants may also continue to receive information orally about Épargne Placements Québec's products and services. In fact, some of Épargne Placements Québec's agents are required to inform participants on the products and services that may be useful to them and will continue to provide this information when necessary.

Lastly, Épargne Placements Québec may, on occasion, contact participants to ask them if they wish to update their choices regarding promotional offers and consultations. This will make it possible to ensure that the files reflect their preferences.

## **PARTICIPANTS' RIGHTS**

### ***Right to access information***

Participants may request access to their information held by Épargne Placements Québec:

- by accessing the "Profile" section of their account on Online transactions, the transactional website;
- by calling Épargne Placements Québec's call centre at 1-800-463-5229.

The request will be processed within a maximum of 30 business days or longer if required by law.

### ***Right to have information corrected***

Participants may request that inaccurate information about them be corrected. To ensure quality service, it is essential that participants' information be accurate and complete. To this end, participants must inform Épargne Placements Québec of any changes to their profile.

Participants may update various elements of their profile, such as contact information and communication preferences:

- by accessing the "Profile" section of their account on Online transactions, the transactional website;
- by calling Épargne Placements Québec's call centre at 1-800-463-5229.

Participants may be required to provide certain proofs, for instance in the event of a change of first and last names or a change of representatives listed on the file.

## **RETENTION AND DESTRUCTION OF PERSONAL INFORMATION**

Épargne Placements Québec retains participants' personal information only until the purposes for which it was collected is achieved, or for a longer period if required or permitted by law.

When the purposes for which personal information was collected or used have been achieved, Épargne Placements Québec makes every reasonable effort to destroy the information in a secure manner.

## **Retention locations**

Service providers to whom participant information is disclosed in accordance with this Policy may have facilities outside Québec. This information may therefore be used and retained securely in other Canadian provinces.

## **Security of information**

Épargne Placements Québec makes every effort to protect participants' personal information against loss and theft, unauthorized access, use or disclosure, and any other breach of security. Épargne Placements Québec has implemented a security program to monitor the ever-changing threats to information security.

The measures taken in this security program are the following:

- protecting infrastructure by securing access to facilities and choosing secure locations for Épargne Placements Québec equipment;
- limiting the number of people with access to participant information. This means that only employees who need to consult this information in the course of their work have access to it;
- managing passwords to ensure their strength and complexity;
- implementing firewalls.

Participants also have a role to play in protecting their information. It is up to them never to divulge their passwords, codes, and personal identification numbers. Épargne Placements Québec employees do not have this information and will never ask participants for it. It is important for participants not to disclose any personal information in any communication.

## **CONFIDENTIALITY INCIDENTS**

A confidentiality incident occurs when the protection of personal information is compromised, whether through unauthorized access, collection, use, disclosure, or communication. It also includes the loss or leakage of confidential data that could identify an individual, notably as a result of a cyber attack, virus, fraud or phishing. A confidentiality incident occurs when personal information is sent to the wrong person, or when an unauthorized individual consults or accesses this information. It can also occur when an email, physical document, or fax, for example, is sent incorrectly. Any breach of confidentiality must be reported in accordance with the incident management procedure established by Épargne Placements Québec.

When a confidentiality incident is suspected or confirmed, Épargne Placements Québec must take reasonable measures to reduce the risk of harm being caused and to prevent similar incidents from occurring in the future.

## **TRAINING AND AWARENESS ACTIVITIES FOR ÉPARGNE PLACEMENTS QUÉBEC EMPLOYEES**

All Épargne Placements Québec employees must agree to protect the confidentiality of personal information they require in the course of their duties and to take all necessary measures to ensure its security and protection. They must also participate in security and privacy training offered by Épargne Placements Québec.

## **MAKING A REQUEST FOR INFORMATION OR A COMPLAINT**

Participants may submit a request for information or a complaint concerning the protection of their personal information to Épargne Placements Québec by completing an electronic form available in the "How to reach us" section of the informational website at (<https://epq.gouv.qc.ca/>).

## **COOKIES**

This Policy is complemented by the *Declaration on the Use of Cookies*, available at <https://epq.gouv.qc.ca/>. The latter describes how Épargne Placements Québec handles information on digital interactions collected when participants use its online services.

## EFFECTIVE DATE

The Policy comes into effect on September 5, 2023.

[epq.gouv.qc.ca](http://epq.gouv.qc.ca)