

# PRIVACY POLICY

# **Quebec Religious and Spiritual Tourism Association (QRSTA)**

### 1. Introduction

Privacy protection is important for the Quebec Religious and Spiritual Tourism Association (the "Organization").

The purpose of this Privacy Policy (the "Privacy Policy" or "Policy") is to inform you of our practices regarding the collection, use, disclosure, storage and disposal of your Personal Information.

As part of the operation of our websites, i.e. <a href="www.atrsq.com">www.atrsq.com</a>, <a href="atrsq.com/index.php/es">atrsq.com/index.php/es</a>, <a href="www.divinquebec.com/">www.divinquebec.com/</a> and <a href="www.divinquebec.com/en/">www.divinquebec.com/en/</a>, we may collect, use and process Personal Information in order to provide our Services.

By submitting Personal Information to us through our websites, you consent to the processing of such information as set out in this Policy, and you agree that the Organization and its Service Providers may process your Personal Information for the purposes set out below.

### 2. Definitions

The following terms and expressions, when capitalized in this Policy, have the meaning ascribed hereinafter, unless otherwise implied or explicitly stated:

"Personal Information" means any personally identifiable information relating to an individual, namely information that directly or indirectly discloses information about this individual's identity, traits (e.g. abilities, preferences, psychological tendencies, predispositions, mental abilities, character and behaviour) or activities, regardless of the medium by which or the form in which the information can be accessed (written, graphic, audio, visual, electronic or other).

"Privacy Officer" means the person in charge of implementing this Policy, whose contact information is provided in section 12 of this Policy.

"Sensitive Personal Information" means Personal Information which, by its nature or the context in which it is used or disclosed, creates a reasonable higher expectation of privacy. For instance, this may include medical, biometric, genetic or financial information, or information about an individual's lifestyle or sexual orientation, religious or philosophical beliefs, trade union membership or ethnic origin.



"Service Provider" means any individual or corporation that processes data on behalf of the Organization. This includes third-party companies or individuals employed by the Organization to facilitate the Services, provide the Services on behalf of the Organization, perform services related to the Services or assist the Organization in analyzing the use of the Services.

"Services" refers to the website and all related services offered by the Organization, including professional services and, where applicable, associated media, printed documents and online or electronic documents.

#### 3. Who are we?

The Quebec Religious and Spiritual Tourism Association (QRSTA) is a leader in the development and promotion of religious and spiritual tourism in Quebec. The QRSTA's mission is to bring together stakeholders involved in religious and spiritual tourism in Quebec, actively promote them, represent them before various authorities, and provide expertise, networking opportunities and services to support their development.

### 4. What information do we collect?

# 4.1. Automatically collected information

When you visit and use our websites, we may automatically collect and store the following information:

- Location;
- Pages viewed on our websites.

This is required to enable the server to transmit a file compatible with the computer equipment you're using.

This information is stored and used by the Organization for technical and statistical purposes. It is used to track website visits, frequently visited pages, types of devices, referring websites and visitors' country of origin.

# 4.2. Personal Information not collected automatically

When you visit and use our websites, we may also collect and process the following types of Personal Information in the course of carrying out our activities and Services:

- Information regarding your identity, such as first and last name;
- Contact information, such as an email address;
- Information about how you use and browse our websites and how you interact with our online content, as well as information collected through cookies;



 Any other Personal Information voluntarily provided by email, including when requesting information.

Minors under the age of 14 should not provide us with any Personal Information without the express consent of a parent or guardian.

# 5. How do we collect your Personal Information?

We collect your Personal Information as follows:

• Through the newsletter subscription or update forms on our "DivineQuebec" or QRSTA websites, including their French versions.

Please note that we only collect Personal Information that helps us achieve the purposes set out in this Privacy Policy.

# 6. How do we use your Personal Information?

Your Personal Information will be used in accordance with applicable privacy laws and your consent.

This means we may use your Personal Information in the following circumstances and for the following purposes:

- Responding to requests for information from website users;
- Sending newsletters and other types of emails to our newsletter subscribers (they may unsubscribe at any time);
- Fulfilling and complying with any legal, regulatory or risk management obligations.

We will only use Personal Information to carry out the primary objective for which it was collected and for purposes that are legitimate and consistent with that primary objective.

# 7. Who can access shared Personal Information?

We may share your Personal Information with our employees and with selected third parties, including:

Third-party Service Providers who help us establish, manage and maintain our relationship
with you and provide products and services to us. These third parties may access or process
Personal Information in connection with the services they provide to us. We will only provide
Service Providers with information that they reasonably need to perform their duties.
Written contracts with these Service Providers require them to take reasonable and lawful
measures to maintain the privacy of such information;



 Governmental, regulatory or law enforcement agencies, when we are required to disclose such information or if we believe in good faith that such disclosure is necessary to comply with applicable laws.

The Organization's websites contain links to other sites. Information shared on these sites is not subject to this Privacy Policy but to that of each particular external site, if any. As such, we are not liable for and have no control over those websites' privacy policies and practices. Where applicable, refer to the applicable privacy policies before disclosing your Personal Information to third parties.

# 8. How long do we keep Personal Information?

We will retain your Personal Information only for as long as is necessary to fulfill the purposes for which such information was provided to us and for any compatible or related authorized purposes.

We will cease using your Personal Information as soon as these purposes have been fulfilled.

# 9. How do we protect Personal Information?

We recognize that information security is an integral part of privacy.

We implement industry best practices to ensure the protection of Personal Information as required by applicable privacy laws.

To this end, we maintain reasonable physical, technical and procedural safeguards to protect your Personal Information from unauthorized access, use, disclosure or disposal, and any other breach of security under applicable law.

We have implemented a comprehensive cybersecurity policy and tools to protect user information. These include two-factor authentication, password managers, a private virtual network, a firewall and more, in accordance with best practices.

However, despite our precautions, information transmitted over the Internet and stored in systems connected to the Internet cannot be 100% secure. Therefore, we cannot ensure the security or integrity of such information or guarantee it beyond what is reasonably practical.

# 10. What are your rights with respect to your Personal Information?

As a user, you have the right to access the Personal Information we have collected about you. In addition, you have the right to update or correct any Personal Information in our possession, provided that such a request is legally permitted.



You may withdraw or change your consent to the collection and use of Personal Information at any time, provided it is legally permitted to do so and you have given us reasonable notice.

If you are not satisfied with how your request to access or rectify your Personal Information has been handled, particularly in the event of a lack of response or an unsatisfactory response, you may submit an application for examination of a disagreement to the *Commission d'accès à l'information du Québec*.

#### 11. How do we use cookies?

When you use our websites, we may place a cookie on your computer. Cookies are small data files created by your web browser and placed on your computer. Cookies can be used for a number of purposes, including improving the operation of our website. We use cookies for statistical purposes only.

You can choose to be notified each time a cookie is transmitted. You can also disable cookies entirely in your web browser, but this may reduce the quality of your user experience.

**Third-party cookies:** We may use third-party cookies on our website for the following purposes:

• Cookies are used for statistical purposes only.

For more information about the cookies we use, please see our Cookie Policy, which is incorporated into this Privacy Policy.

# 12. How can you contact us?

If you have any questions about this Privacy Policy or how we handle your Personal Information, or if you want to exercise your rights, please contact our Privacy Officer by email or mail at:

Privacy Officer François-G. Chevrier 7665 Boul. Lacordaire, Montreal, QC H1S 2A7 dpo@eaq.quebec

# 13. How do we update this Privacy Policy?

We may change the content of our websites and how we use cookies without notice. Therefore, this Privacy Policy and our Cookie Policy may be amended at any time to comply with applicable law.

As such, we invite you to review the policies on our websites on a regular basis to stay up-to-date about how we handle Personal Information.