

## DÉTAIL QUÉBEC PRIVACY POLICY

This document contains the Privacy Policy (the «**Policy**») set up by the *Comité sectoriel de main-d'œuvre du commerce de détail*, also doing business under *Détail Québec* and the *Mutuelle de formation du commerce* («**Détail Québec**»), owner and operator of the (current and future) websites «[www.detailquebec.com](http://www.detailquebec.com)», «[www.zonedetail.com](http://www.zonedetail.com)», «[wiki.detailquebec.com](http://wiki.detailquebec.com)», «[www.penseaudetail.com](http://www.penseaudetail.com)» and, as the case may be, of any other sites substituted or added to these sites referred to as (the «**Website(s)**»), to ensure preservation of the confidentiality of personal or confidential information and respect of a person's privacy.

### What is meant by «Personal Information»?

«**Personal information**» is information concerning a physical person that allows identification of such person. For example, personal information may relate to the name, residential address, personal phone number, e-mail address and date of birth of a person as well as to that person's credit information and access code to a website.

This Policy applies to Détail Québec's conduct in regards to personal or sensitive information (collectively, the «**Information**») of physical persons and/or, based on circumstances, of enterprises (the «**Clients**») that subscribed to Détail Québec's various services, either online or by way of any other means provided for such purposes, or that purchased Détail Québec's products at its online shop.

### 1) COLLECTION OF INFORMATION

Détail Québec collects Personal Information solely within the limits deemed necessary for the accomplishment of its mission.

More particularly, Détail Québec collects Information in the following circumstances:

- 1) Subscription to the *Réseau des détaillants*, to receive relevant information on training sessions and other activities organised by Détail Québec ([www.detailquebec.com/inscription.php](http://www.detailquebec.com/inscription.php));
- 2) Access to the skills recognition process ([www.detailquebec.com/reconnaissance](http://www.detailquebec.com/reconnaissance)); it should be noted that upon registration to such service, retailers (retail store administrators) are automatically registered with the *Réseau des détaillants*;
- 3) Purchase of training sessions or other products (studies, enquiries, classroom teaching aids, etc.) from Détail Québec at the online shop ([www.detailquebec.com/boutique](http://www.detailquebec.com/boutique));
- 4) Access to online training sessions ([www.detailquebec.com/zonedetail](http://www.detailquebec.com/zonedetail)) and ([www.zonedetail.com](http://www.zonedetail.com));
- 5) Enlistment in the employment billboard, for employers wishing to post jobs (offers [www.penseaudetail.com](http://www.penseaudetail.com));
- 6) Registration to WikiDétail, for anyone wishing to contribute to the Wiki on retail trade ([wiki.detailquebec.com](http://wiki.detailquebec.com));
- 7) Registration with *Pense au détail*, the online game on retail trade knowledge ([www.penseaudetail.com/jeu/poste.php](http://www.penseaudetail.com/jeu/poste.php));
- 8) Enlistment in the teachers and suppliers directory, to announce their products and services;

- 9) Online registration to classroom training sessions ([www.mutuelleducommerce.com](http://www.mutuelleducommerce.com) or [www.detailquebec.com/formation](http://www.detailquebec.com/formation)) and to the online shop ([www.detailquebec.com/boutique](http://www.detailquebec.com/boutique)).

**Transmission Lists;** from time to time, Détail Québec may have access to data bases of addressees to which e-mails may be sent for the purpose of recruiting new clients. Any such e-mail offers the recipient the possibility to unsubscribe from the list. In that event, the recipient is immediately removed from the transmission list; his/her address is erased from the active database and is held as an inactive contact for archival purposes.

## **2) USE OF THE INFORMATION**

### **a) Service Management**

The Information collected is used, namely, to identify and communicate with the Clients; to establish admissibility to training sessions; to determine the results obtained in the context of a training; to establish the right to obtain professional skills recognition; to confirm online purchase of the various products and services offered by Détail Québec; for online payment management and, generally, to allow administration of the online training platform and of the various products and services offered by Détail Québec as well as for obtaining information to improve the aforesaid, including by means of satisfaction surveys.

In particular situations and taking into account the type of service delivered by Détail Québec, namely in the context of the skills recognition process, Détail Québec may communicate relevant Personal Information of its Clients to the responsible person, institution, enterprise or organization — including the *Ministère de l'Emploi et de la Solidarité Sociale* and Human Resources and Skills Development Canada — whose need to know is acknowledged and who are subject to an obligation to maintain the confidentiality of the information and the respect of a person's privacy.

### **b) Services by External Suppliers**

Détail Québec may from time to time call onto external service suppliers to enhance the quality of its services in specific areas. In that context, some of the Clients' Information may be transmitted to such suppliers. Those suppliers are tied by contract to the present Policy and must use the Information solely in relation to services delivered on behalf of Detail Quebec.

In the event that those external service suppliers wish to request additional Information directly from the Clients (e.g. to survey the use of their services), prior notice will be given to the Clients. Should the Client decide to provide such Information, the privacy policy of that external service provider shall govern such communication.

### **c) Legal Obligation**

Détail Québec may have to disclose its Clients' Information to competent persons or authorities should it be needed to conform to any legal obligation or comply with an injunction order, to protect and defend its rights or to assure compliance with the terms of use of its services.

### **d) Other Circumstances**

In the event that Détail Québec intends to use or disclose any of its Clients' Information for purposes other than those specifically described in this Policy, Détail Québec undertakes to obtain the Client's consent.

Depending on the nature of the information, such consent may be provided verbally, by means of a form, message or written correspondence or, in certain circumstances, implicitly when the consent may be clearly inferred from the Client's conduct.

### **3) PROTECTION OF THE INFORMATION**

Détail Québec conforms namely to the Canadian *Personal Information Protection and Electronic Documents Act* together with the *Act respecting the protection of personal information in the private sector* of Quebec. Moreover, by virtue of its framework Agreement on Sectoral Development of Manpower and Employment with the Minister of Employment and Social Solidarity, Détail Québec has undertaken to comply with obligations contained in the *Act respecting Access to documents held by public bodies and the Protection of personal information* (R.S.Q., chapter A-2.1) with respect to the protection of Personal Information collected or communicated in the course of execution of its mandate. To this end, Détail Québec uses various measures to ensure the integrity and confidentiality of its Clients' Personal Information. These measures are aimed at preventing the loss or theft of such Information, as well as its unauthorized reproduction, modification, use, consultation and disclosure.

The Websites are secured through the use of technology recognized in the industry. Access to Clients' Information is only provided to personnel authorized by Détail Québec, and this, solely for the purposes mentioned in this Policy or dictated by the service offered. Agreements are also signed between Détail Québec and its employees and subcontractors so that Clients' Information is used in conformity with the present Policy and with any applicable law, rule or regulation.

### **4) SECURED ONLINE PAYMENT**

Online payment via our Websites is managed by Desjardins, an acknowledged secured payment supplier. The transactions data (billing details, client identification and credit card numbers) are encrypted from the Website and transmitted to Desjardins. Confidentiality of Clients' Information is thus preserved. Apart from exceptions as provided in this Policy, Détail Québec and Desjardins undertake never to disclose Information pertaining to Clients' credit cards.

### **5) COOKIES OR OTHER SIMILAR TRACING TECHNOLOGY**

A cookie («**Cookie(s)**») is a small text file that contains a unique identification number and that is transmitted by a website server to the hard disk of the user's computer. A Cookie allows to distinctively identify users of a website and to follow certain of their activities on that website.

Cookies are used to increase knowledge on online behaviour on Websites thus allowing improvement of their quality. The anonymous character of visitors that brow through the Websites is preserved at all times.

Détail Québec also inserts a unique electronic image in the source code of each of its e-mails sent in bulk. Such image contains a technology which transmits to Détail Québec certain information that allows to know if the recipient's address is valid, if the e-mail was received and viewed, and if the recipient has clicked on any hyperlink within the e-mail.

Such information is collected to optimize e-mail transmission's efficiency and to gather statistics on the use of the services offered by Détail Québec.

## 6) INFORMATION RETENTION PERIOD

Détail Québec will only use its Clients' Information for the period deemed essential for the purposes described in this Policy. After such period, Détail Québec may store certain Information believed to be necessary for archival purposes in the « inactive » category of its database. Détail Québec undertakes to erase or destroy all Personal Information from a Client's file at the Client's request in writing, transmitted by e-mail or by mail, at the address indicated in the last page of this Policy.

The Information contained in training files will, however, be kept as long as necessary to ensure that Détail Québec's archives, as well as any relevant Information on a Client's participation to any training activity, are complete and accessible, and this, in compliance with acknowledged trade practices and applicable regulatory requirements, as the case may be.

## 7) CLIENTS' OBLIGATIONS

The Client has the obligation to ensure the secrecy of his/her access code given by Détail Québec and password used in connexion with the services offered.

In the context of registration with WikiDétail, the Client has the responsibility of choosing a pseudonym that reveals or not his/her identity. The Client is also responsible to include or not Personal Information in his/her profile whereas it is clearly understood that **such profile will be posted** on the Website.

## 8) ACCURACY AND UPDATE OF THE INFORMATION

Détail Québec makes all necessary efforts to ensure that the Information kept in its Clients' files is accurate, complete and up to date. It is therefore important that the Client informs Détail Québec of any relevant changes in the Information related to him/her that was provided to Détail Québec. In order to verify the accuracy of the Information provided and/or to correct such Information, as the case may be, the Client is authorized to consult his/her file, including any Personal Information collected, by communicating in writing with Détail Québec, either by e-mail or by mail, at the address mentioned below.

Détail Québec may also contact a Client by e-mail or by phone in case of an incorrect return address or if any other information seems inaccurate.

## 9) MODIFICATION TO THIS POLICY

This Policy may be updated from time to time. Détail Québec reserves the right to modify this Policy at its discretion, by adding or subtracting certain terms and conditions.

To assist Clients in identifying modifications to the Policy, Détail Québec will post the dates of modification visibly in a space to this effect on its Websites.



## 10) TO COMMUNICATE WITH DÉTAIL QUÉBEC

With respect to any question pertaining to this Policy, its last updates or the practices related to the collection, use, maintenance or disclosure of Personal Information, or for filing a complaint or report an abuse by a third party, Clients are invited to communicate with Détail Québec by e-mail at [info@detailquebec.com](mailto:info@detailquebec.com) or at the following mailing address:

**Détail Québec**  
550, Sherbrooke Street West  
Bureau 590, West Tower  
Montreal (Quebec) H3A 1B9