

PRIVACY POLICY

SOCIÉTÉ DES FÊTES ET FESTIVALS DU QUÉBEC, FESTIVALS ET ÉVÉNEMENTS QUÉBEC
and
LA SOCIÉTÉ DES ATTRACTIONS TOURISTIQUES DU QUÉBEC
doing business as **ÉVÉNEMENTS ATTRACTIONS QUÉBEC (ÉAQ)**

1. General information

1.1 Introduction

Privacy protection is fundamental for the **SOCIÉTÉ DES FÊTES ET FESTIVALS DU QUÉBEC and FESTIVALS ET ÉVÉNEMENTS QUÉBEC AND SOCIÉTÉ DES ATTRACTIONS TOURISTIQUES DU QUÉBEC doing business as ÉVÉNEMENTS ATTRACTIONS QUÉBEC (ÉAQ)** (the “**Organization**”). For this reason, we have implemented proper safeguards and practices to handle your Personal Information in accordance with applicable laws.

This Privacy Policy (the “**Privacy Policy**” or “**Policy**”), which should be read in conjunction with the Website’s terms and conditions as well as the Service Agreements entered into with the Organization, describes our practices regarding how we collect, use, process, disclose and store the Personal Information of our clients, visitors and users.

When using our Websites (Quebecvacances.com, Quebecgetaways.com, QuoifaireauQuebec.com, Enjoyquebec.com, Evenementsattractions.quebec, Meps.eaq.quebec, Numerique.eaq.quebec, Viragedurable.com, Fsdot.eaq.quebec, Boutique-quoifaireauquebec.com, Congres-eaq.com and Rendez-vous-eaq.com) or Services, you agree that we may collect, use, process, disclose and store your Personal Information in accordance with the provisions described herein. If you do not agree to comply with and be bound by this Policy, you may not visit, access or use our Websites or Services, or share your Personal Information with us.

This Policy does not apply to Personal Information regarding the Organization’s employees, representatives and consultants, or any of its affiliates, or to any information that does not constitute Personal Information as defined by applicable law.

1.2 Privacy Officer

Questions, comments and complaints regarding the Organization’s Privacy Policy and related practices may be addressed to our Privacy Officer, François G. Chevrier, using the following contact information:

Email: dpo@eaq.quebec

Address: 7665 Boul. Lacordaire, Montreal, QC H1S 2A7

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 1.2 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 Websites and all related services offered by the Organization, including professional services and, where applicable, associated media, printed documents and online or electronic documents.

3. Processing Personal Information

3.1 Collecting Personal Information

Your consent to share your Personal information with us

For the Organization, protecting your privacy and the confidentiality of your data is of utmost importance. We have therefore developed this Privacy Policy to let you know what information we collect, how we process it, and when we need to share it with contractors or third parties.

By consenting, you authorize the Organization to collect and process the Personal Information about you required to provide our Services to you. Keep in mind that you maintain control over your Personal Information at all times, and that your consent to the collection or processing your Personal Information may be withdrawn at any time. We will honour your choice in accordance with our legal obligations.

Consent management

We and our partners set cookies and use non-sensitive information from your device to improve our products and display personalized advertising and content. You can accept or decline these cookies

Strictly necessary cookies

We use cookies that are essential for the proper functioning and security of our websites; they cannot be deactivated.

Optional cookies

We also use optional cookies to facilitate, enhance and personalize your online experience; you can manage your preferences and deactivate them at any time. You can change your consent at any time by clicking on the “Manage cookies” link at the bottom of each page or via a pop-up window.

It is essential to read this Policy conjointly with our Website’s terms of use

<https://www.quebecgetaways.com/outils/politiquesUtilisation.aspx>

As part of our business activities, we may collect, process and use different types of Personal Information you give us only as permitted by law. This includes the information listed below:

Via our Website:

- contact information, such as your first and last name, email address and gender, that is used to sign up for our Quebec Getaways newsletter or when you register via the website (account creation);
- information you choose to provide or transmit to us, for example when you fill out a form, enter a contest, respond to surveys or communicate with one of our employees or representatives;
- information automatically collected through the use of the Website and our Services, including:
 - log-in information and other information about your activities on the Website, such as your IP address, the pages you visit, the time and date of your visits, the type of browser you use, the operating system of your device and other hardware and software information;
 - geolocation data, such as your IP address, a precise or approximate location determined from your IP address or your mobile device’s GPS (depending on your device’s settings).

Via our association's website or by using the services our association offers to businesses:

- professional or employment-related information, such as your resume, place of employment, government titles or positions, employers, companies owned, salary or self-employment income, as well as information regarding your criminal history and other information you provide to us when you apply for employment with the Organization;
- contact information, such as your first and last name, email address, phone number, address and company number for the creation of a customer account;
- information about products or services, such as information about the services we have provided to you;
- transaction and payment information, such as the payment method used, date and time, payment amount, billing postal code, your address and other related information.

Please note that our company cannot guarantee the security of your credit card information or any other payment method you use to make a transaction with our tourism service providers. We recommend that you check the privacy policy and security practices of these suppliers before providing your payment information.

In each case, such Personal Information is processed in accordance with the lawful and necessary purposes listed in section 3.2 below. In addition, we ensure that we only collect and process data and Personal Information that is strictly necessary for the purposes for which you provide them to us. In the event of any subsequent use of your Personal Information, we will notify you as required by law.

3.2 Use of Personal Information

As stated in section 3.1, **we use your Personal Information only as permitted by law.** We may use your Personal Information for the lawful purposes described below:

- To provide Services;
- To allow you to sign up for the Quebec Getaways newsletter;
- To assess the technological performance of the Websites and perform marketing research, namely using Google Analytics and Facebook Insights;
- To verify your identity and review your personal history, as permitted by law;
- To allow you to apply for a position within the Organization;
- To operate, maintain, supervise, develop, improve and offer all the features of our Websites;
- To manage risk and activities;
- To meet our obligations under applicable laws and regulations;
- To develop new Services and improve our Websites and Services;

- For marketing and business development, if you have previously consented to your Personal Information being processed for these purposes;
- To send you messages, updates and security alerts;
- To answer your questions and provide assistance if needed;
- To manage a contest, promotion, survey or other feature of the Websites or our Services;
- To collect opinions and comments about our Services;
- To conduct research and analysis related to our business and Services;
- To detect and prevent fraud, errors, spam, abuse, security incidents and other harmful activities;
- To establish, exercise or defend a right or legal claim;
- To communicate with you in accordance with the law;
- For any other purpose permitted or required by law.

Please note that we do not use the information we collect to draw any inferences or interpretations whatsoever.

The Personal Information we collect and store remains encrypted and is securely archived on Microsoft Azure servers located in Central Canada (Toronto). Rest assured that Personal Information is disclosed only when we are legally required to do so.

3.3 Disclosure of Personal Information

We may disclose your Personal Information to our employees, contractors, consultants, agents, Service Providers and other trusted third parties who require such information to assist us in operating our Websites, conducting and protecting our business activities or performing services, insofar as these Service Providers have previously agreed in writing to keeping your Personal Information confidential in accordance with applicable laws and our Information Governance Program. In addition, only the Organization's employees who need to access and process your Personal Information will be given such access, in accordance with our internal privacy policy.

We do not sell, trade or otherwise disclose your Personal Information to third parties, subject to exceptions provided by law.

3.3.1 Service Providers and other third parties

Although we try to avoid sharing your Personal Information with third parties, we may use Service Providers to perform various services on our behalf, such as IT management and security, marketing, and data analysis, hosting and storage. We have listed below the cases in which such sharing may occur:

- We use **cyberimpact.com** to collect information in connection with our newsletters. [View their privacy policy.](#)
- We use **Axeptio** for Quebecvacances.com and its English version QuebecGetaways (Consent Management Platforms (Compliant with RGPD (European Union), [Bill 25](#) (Quebec), nLPD (Switzerland) and [certified by Google](#)).
- We use **ActivCampaign** for our mailings related to our tourism promotion ecosystem for Quebecvacances.com and its English version Quebecgetaways.com. [See their privacy policy.](#)
- We use **Tonik Web Studio** for the implementation of a consent manager on our websites. This provider also carries out feature update mandates for the Quebecvacances.com / Quebecgetaways.com site as well as for the evenementsattractions.quebec site. [View their privacy policy.](#)
- We use the services of Cossette Inc. to manage our digital environment for our promotional sites (on Quebecvacances.com / Quebecgetaways.com).
- We use the services of **Direct Impact Solutions** to manage our customer database and web servers. [View their privacy policy.](#)
- We use the services of **Regroupement Loisir Québec** to host our administrative and human resources data. [View their privacy policy](#) (available in French only).
- We do not collect financial information via our web registration forms. **We use PayPal for financial transactions** such as webinar purchases or other services. [View their privacy statement.](#)

When we disclose your Personal Information to Service Providers, we enter into written contracts with them prior to disclosing your Personal Information, and we only provide them with the Personal Information necessary to perform their duties. Under these contracts, we are committed to ensuring that our Service Providers comply with the principles set out in this Policy, and these Service Providers are required to use your Personal Information in accordance with our guidelines and only for the purposes for which it was provided. In addition, these Service Providers shall provide us with sufficient guarantees about implementing safeguards that are adequate for and proportionate to the sensitive nature of the Personal Information processed or disclosed. When our Service Providers no longer need your Personal Information, we ask them to appropriately dispose of it.

3.3.2 Complying with legislation, responding to legal inquiries, preventing damages and protecting our rights

We may disclose your Personal Information when we believe such disclosure is authorized, necessary or appropriate, including:

- to respond to inquiries from public and governmental authorities, including public and governmental authorities outside your country of residence;

- to protect our business;
- to comply with legal proceedings;
- to protect our rights, privacy, security and property, yours or that of third parties;
- to enable us to pursue available remedies or limit damages we may suffer;
- in accordance with applicable laws, including laws outside your country of residence.

3.3.3 Commercial transaction

We may share, transfer or disclose your Personal Information strictly in accordance with this Policy in the event of a sale, transfer or assignment, in whole or in part, of the Organization or its assets (for example, as a result of a merger, consolidation, change of control, reorganization, bankruptcy, liquidation or other commercial transaction, including in connection with the negotiation of such transactions). If any of these events occur, we will inform you before your Personal Information is transferred and becomes governed by a different privacy policy.

3.3.4 Consent regarding Personal Information

Wherever possible, the Organization shall obtain, directly from the individual subject to this Policy, consent to collect, use and disclose their Personal Information. However, if you provide Personal Information about other individuals to us, you must duly notify them that you are providing this information to us, in addition to obtaining their consent to such disclosure.

We will seek your express consent before using or disclosing your Personal Information for purposes other than those described herein.

3.3.5 Retention of Personal Information

In accordance with applicable laws, we shall retain your Personal Information only for as long as is necessary to fulfill the purposes for which it was collected, unless you consent to its use or process for other purposes. In addition, our retention periods may be amended from time to time on the grounds of legitimate interests (e.g. to ensure the security of your Personal Information, to prevent abuse and breaches or to prosecute criminals).

Rest assured that once the purpose for which the information was collected has been fulfilled, we shall dispose of the information or render it anonymous in accordance with applicable law.

For more information on how long we retain your Personal Information, please contact our Privacy Officer using the contact information provided in section 1.2 of this Policy.

3.4 Sensitive Personal Information

It is unlikely, although not impossible, that we may in some circumstances need to collect Personal Information that is considered sensitive. Prior to collecting any such information, we will conduct a Privacy Impact Assessment to determine what issues may arise with respect to the collection of such data. As always, the Organization will collect Sensitive Personal Information only when strictly necessary for our operations.

In addition, before collecting such Sensitive Personal Information, we shall obtain your explicit consent to do so, as required by law.

4. Your rights

As an individual subject to this policy, you may exercise the rights set out below by sending a request by email or by mail to our Privacy Officer using the contact information provided in section 1.2 of the Policy:

- You have the right to be informed of the Personal Information we have collected about you and to request a printed copy of the documents containing your Personal Information, except as provided by applicable law;
- You have the right to have the Personal Information we have about you rectified, amended and updated if it is incomplete, ambiguous, outdated or inaccurate;
- You have the right to withdraw or change your consent to the Organization's collection, use, disclosure or retention of your Personal Information at any time, subject to applicable legal and contractual restrictions;
- You have the right to ask us to cease disseminating your Personal Information and to de-index any link attached to your name that provides access to this information if such dissemination violates the law or a court order;
- You have the right to file a complaint with the *Commission d'accès à l'information du Québec* (Quebec Commission for Access to Information), subject to the conditions set out in the applicable law.

In order to process your request, you may be asked to provide appropriate proof of identity or to otherwise identify yourself.

We encourage all our customers to keep their Personal Information on our records updated. Decisions regarding the various services we can offer our customers may vary depending on the accuracy of this data. It is therefore essential that we have an accurate picture of your situation.

5. Security measures

The Organization has implemented physical, technological and organizational security measures to adequately protect the confidentiality and security of your Personal Information against loss, theft or any unauthorized access, disclosure, duplication, communication, use or modification. These measures include encryption, access control, segregation of duties, internal auditing, etc.

Some of the measures implemented include:

- Our Websites use the Secure Sockets Layer (SSL) protocol to provide a secure connection between your device and our server;
- The Organization's employees have read this Policy and agree to abide by it and protect the confidentiality of Personal Information about our potential and existing customers. In addition, each employee agrees to comply with a Data Governance Policy applicable to all of the Organization's staff;
- As mentioned in section 3.3, we have implemented measures so that only individuals who have a valid reason to consult, process, disclose or otherwise use your Personal Information have access to it;
- As mentioned in section 3.3, contractors and third parties who conduct business with the Organization and to whom we may need to disclose your Personal Information have previously agreed to protect the confidentiality and privacy of such information;
- When the purpose for which we collected your Personal Information has been fulfilled and we no longer need to retain it, the Organization will dispose of this data or render it anonymous, subject to applicable laws.

Despite the measures described above, we cannot guarantee the absolute security of your Personal Information. If you have reason to believe that your Personal Information is no longer secure, please contact our Privacy Officer immediately using the contact information provided in section 1.2 above.

6. Changes to this Privacy Policy

We reserve the right to change this Policy at any time in accordance with applicable law. In the event of a change, we will publish the revised version of the Privacy Policy and update the revision date in the footer of the Policy. We will also notify you by email at least thirty (30) days before the new version of our Policy takes effect. If you disagree with the new terms of the Privacy Policy, please do not continue to use our Websites and Services. If you choose to continue to use our Websites or Services after the new version of our Policy takes effect, your use of our Websites and Services will be governed by the new version of the Policy.

7. Links to third-party websites

On our Websites, we include references or links to websites, products or services provided by third parties (“**Third Party Services**”). These Third Party Services, which are not operated or controlled by the Organization, are governed by privacy policies that are entirely separate and independent from ours. We therefore assume no liability for the content and activities on these sites. This Policy applies only to the Websites and the Services we offer. This Policy does not extend to Third Party Services.

Limitation of liability

The Organization is committed to taking all reasonable measures to ensure a level of confidentiality and security of Personal Information that meets the technological standards appropriate to its industry.

Notwithstanding the foregoing, you hereby represent that you understand and acknowledge that no computer system offers absolute security and that there is always a degree of risk involved in transmitting Personal Information over a public network like Internet.

You hereby agree that the Organization shall not be held liable for any breach of confidentiality, hacking, virus, loss, theft, misuse or alteration of Personal Information transmitted or hosted on its systems or those of a third party. You also waive any claim in this regard, except in the case of gross negligence or wilful misconduct by the Organization. Therefore, you agree to indemnify and hold harmless the Organization and its officers, directors, affiliates and business partners from and against any and all damages of any kind, whether direct or indirect, incidental, special or consequential, arising out of or in connection with the use of your Personal Information.

In the event of a breach of confidentiality or security of your Personal Information that presents a high risk to your rights and freedom, you will promptly be notified of such breach, and the Organization shall take the necessary steps to preserve the confidentiality and security of your Personal Information.

8. Publication of user-generated content

Websites users may, via their user account, post comments and other information as desired. We remind you that the Organization cannot be held liable for the content of your comments, nor for any consequences that may arise from them. To ensure the protection of your personal data, we strongly advise you not to publish any Personal Information about yourself on our Websites.

9. Contact us

Any question, comment, request or concern regarding this Privacy Policy should be directed to our Privacy Officer using the contact information provided in section 1.2 of this Policy.