

PRIVACY POLICY

CSUR is an innovative and thriving company! Launched in 2006 in response to the lack of Internet access in the region, CSUR has since rolled out several hundred kilometers of optic fiber cable and opened the Marche Écologique facilitating the marketing of local products and access to ecological food for regional families.

To fulfill this commitment, CSUR attaches great importance to protecting personal information communicated to and by its members during its activities, including browsing its websites or using its online sales service for the Marché Écologique.

SCOPE AND APPLICATION

This policy is designed to meet the legal privacy and data protection requirements for personal and private informations.

More specifically, this policy addresses collecting, holding, using disclose, and destruction of personal information in the private sector. These rules are designed to balance the privacy rights of individuals with respect to their personal information, with CSUR's need to collect, use or disclose such information in the course of its business activities.

For the purposes of this policy, "personal information" means any information about an identifiable individual.

PROTECTION

To ensure compliance with this policy, CSUR makes every effort to train its employees, representatives, and agents to always behave responsibly regarding the protection of personal information. To this end, we offer appropriate information and awareness training.

At CSUR, the protection and confidentiality of the personal information we hold is controlled at every level: collection, holding, use, communication, and destruction.

At each level of the management of personal information held by CSUR, we ensure that we obtain the consent of the concerned person, which must be manifested, free, informed and given for specific purposes; it is only valid for the time necessary to achieve the purposes for which it was requested. In this respect, CSUR favors obtaining the consent in writing.

1) COLLECTION

Only employees, representatives, or agents whose duties within CSUR so require are authorized to collect personal information on its behalf.

In principle, this information is collected from the person concerned, with his or her consent. However, personal information may be collected from a third party, provided that the consent of the person concerned has been obtained, or if authorized by law.

The only personal information that may be collected by CSUR is that which is necessary for the performance of its duties, the achievement of specific identified purposes or the fulfillment of its missions.

The person from whom information is collected must be informed of the foregoing, in addition to the use that will be made of the information, the category of persons who will have access to it, where it will be held and his or her right of access or rectification.

2) DETENTION

CSUR applies strict security rules and makes every commercially reasonable effort to ensure the confidentiality of the personal information it holds on behalf of its members and to protect it against loss and against any unauthorized access, use, duplication, or modification. CSUR shall ensure that these measures are reasonable considering, among other things, the sensitivity of the personal information, the purpose for which it is to be used, its quantity, distribution and medium.

In addition, CSUR ensures that all personal information contained on paper is destroyed and kept only on computer media. This information is held in such a way as to allow effective, secure, and limited access control.

3) USE

Access to personal information will be limited to employees, representatives, or agents of CSUR for whom such information is necessary for the performance of their duties.

The use of personal information held by us is limited to the purposes for which it was collected.

CSUR shall ensure that personal information held is up-to-date and accurate at the time it is used.

4) COMMUNICATION

CSUR is committed to not share personal information with third parties without having first obtained the consent of the person concerned or with the authorization of the law.

At all times, CSUR will not sell, assign, or lease personal information to a third party.

In all authorized or permitted communications, CSUR ensures that the confidentiality of personal information is protected.

More specifically, electronic mail must not be used to communicate messages or documents containing personal information without the consent of the person concerned, unless appropriate measures are used to ensure the security and confidentiality of the communication.

5) DESTRUCTION

When personal information held by CSUR is no longer required for the purposes for which it was collected, CSUR ensures that all documents containing personal information, regardless of its medium, is destroyed according to a process that ensures the confidentiality of the information contained.

ACCESS

Upon request, CSUR agrees to inform any person of the fact that it holds personal information concerning them, of the use made of such information and of its disclosure to third parties, if applicable.

At all times, CSUR must allow the person to access and consult the personal information concerning them.

The person may also challenge the accuracy of the information held on their account by CSUR and have it amended as required by law.

To request access to personal information, or to request a correction or update of such information, the person may contact the Accounting Department at comptabilite@csur.ca.

The latter must provide the person with a response within thirty (30) days of receipt of the request.

RESPONSIBILITY

Any employee, representative or agent of CSUR handling personal information is required to always take all appropriate measures to ensure strict compliance, with this policy and the obligations relating to the Protection of Personal Information.

In case of doubt as to the application of this policy, any employee, representative, or agent of CSUR is required to consult CSUR's general management before taking any action that could result in the collection, holding, use, communication, or destruction of personal information in violation of the law.

Any observed or apprehended breach of the provisions of this policy or of the law, which may affect the confidentiality of personal information held by CSUR, must be reported without delay to CSUR's senior management.

CSUR's general management is available to answer any questions regarding the content or application of this Privacy Policy.

Any complaint concerning the management or application of this Privacy Policy should be forwarded within a reasonable time to CSUR's general management at the following address: 633 rue principale, Sainte-Marthe, JOP1W0.

POLICY NOT APPLIED

When leaving the organization's Web site for any other Web site linked to the CSUR's Web site, this policy no longer applies. Please refer to their policy, if applicable.

In the event of a merger or other legal reorganization, all personal information may be transferred to the new legal entity.

CONFIDENTIALITY INCIDENT PROCESS

In the event of an incident involving personal information, CSUR will follow the procedure set out in the Act respecting the protection of personal information in the private sector and its related regulations. When an incident presents a risk of serious harm, the Access to Information Commission (AIC) as well as the persons concerned by the incident will be notified as quickly as possible following knowledge of the incident, insofar as the situation permits.

If third parties need to be contacted to mitigate the damage that may result from the incident, the person responsible for the protection of personal information will ensure that only the personal information required for this purpose is communicated, and that this communication is recorded. An incident log will be maintained by the Privacy Officer.

By transmitting personal information to the organization, it is understood that the persons understand that the organization deploys best work practices and protection mechanisms to limit the possibility of any incident, leak, or misuse of personal information. However, the organization cannot guarantee infallible security for every conceivable scenario.

When a person notices a possible incident concerning their personal information within the organization, they must contact the person responsible for the protection of personal information at the coordinates posted above. Complaints/reports are processed within a maximum of thirty (30) days after they are filed.

WHAT THE LAW REQUIRES (AMONG OTHER THINGS):

- As of September 2022:
 - Designate a person responsible for personal information protection and publish the title and contact details of the person responsible on the company's website or, if it does not have a website, make them available by any other appropriate means.
 - The CSUR person responsible for personal information protection is the person in charge of general management.
 - Their name and contact information appear on the csur.ca website.

- As of September 2023:
 - Have established policies and practices pertaining to the governance of personal information and publish detailed information about them in simple, clear terms on the company's website or, if it does not have a site, by any other appropriate means.
 - Respect the new rules governing consent to the collection, communication, or use of personal information.

- Destroy personal information once the purpose for which it was collected has been fulfilled, or anonymize it and use it for serious and legitimate purposes, subject to the conditions and retention period stipulated by law.
- From September 2024:
 - Responding to requests for portability of personal information