

Confidentiality Policy

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1. Objectives of the policy

The goal of this Confidentiality Policy is to explain how the personal information collected online by MOMENTA Biennale de l'image as it exercises its [mission](#) is processed. Here, we describe how personal data are collected, used, conserved, and destroyed. We see this process as an opportunity to examine our practices, following adoption of *Act 25 – An Act to Modernize Legislative Provisions as Regards the Protection of Personal Information*. Among other things, this new statute has provided the MOMENTA team with a clearer framework with regard to managing personal data used and integrating steps to take if there is a complaint or a confidentiality incident.

1.1 Definition

The [Commission d'accès à l'information](#) (CAI) defines personal information as “any information which relates to a natural person and directly or indirectly allows that person to be identified. Personal information is confidential. Its confidentiality is based on the right to privacy, which allows each individual to exert control over the use and circulation of his or her information.”

1.2 Personal information collected

It is important to note that the only personal information collected automatically by the organization is:

- Users' IP address
- The city where users are located when they visit the website
- The type of device and the type of navigator used

All other information collected on our website that could be used to identify an individual is offered by its owner willingly and consciously, for example when the individual fills out a form. Here is the complete list of personal information collected by all newsletter forms accessible on our website:

- Last and first names
- Email address
- Home address
- Telephone number
- Occupation
- Interests

2. Applicable statutes

Situated in Tiohtiá:ke/Mooniyang/Montréal, MOMENTA Biennale de l'image is subject to the *Personal Information Protection and Electronic Documents Act* at the federal level and *Act 25 – An Act to Modernize Legislative Provisions as Regards the Protection of Personal Information* at the provincial level.

3. The responsibilities of each team member

Although one person has been appointed manager, protection of personal information (see point 11), it is the responsibility of each member of the team to participate in the inventory of personal information collected and archived. Each member of the team must comply with the present policy and adhere to the *Guide des bonnes pratiques en matière de protection des renseignements personnels* (an internal guide to good practices with regard to protection of personal information). Finally, each member of the team must note and indicate in the register any incident related to confidentiality.

4. Training on protection of personal information

The manager, protection of personal information, must stay updated with regard to protection of personal information and share such updates with the team. This person must assemble procedures for proper management of confidential data in the *Guide des bonnes pratiques en matière de protection des renseignements personnels* (an internal guide to good practices with regard to protection of personal information).

5. Accessibility of data

One good practice that we feel is essential to protection of personal information is to reduce access to confidential data as much as possible. The personal data collected by our website are protected by a password to which only the organization's employees have access. We use IONOS as our website host. Please refer to its [Privacy Policy](#) to learn about its practices concerning collection and conservation of personal information.

6. Personal information lifecycle

Before this policy was published, we conducted a thorough examination of the complete lifecycle of personal information within the organization in order to reduce as much as possible the risk of a confidentiality incident. The detailed steps to follow for management of confidential data are found in our *Guide des bonnes pratiques en matière de protection des renseignements personnels*. Here is a summary of the steps in this lifecycle:

6.1 Determination of necessary information: The goal of this step is to reduce to a minimum the quantity of personal data collected, and to list the methods used to collect them and the reasons for collecting them.

6.2 Consent: Users agree that by using our website or filling out an online form, they are consenting to the conditions stated in this Confidentiality Policy and to the collection, use, and conservation of personal data.

6.3 Collection of personal information: It is important to note that the only personal information collected automatically by the organization is the IP address, city, and type of device used by visitors to its website. All other information collected on our website that could be used to identify an individual is offered by its owner willingly and consciously – for example, when the individual fills out a form.

6.4 Use or communication: The personal data collected automatically on our website are used solely for statistical purposes. The personal information collected when users subscribe to the newsletter is used for contact purposes. The personal information collected during our calls for proposals is used for the purpose of evaluating the portfolios and for contact. All information is anonymized before being used for statistical purposes. These data are shared within the team only when necessary. If personal information must be shared with a third party, we privilege direct sharing between the person concerned and the third party. If this proves to be impossible, we will request permission from the person concerned before sharing the confidential information.

6.5 Conservation: The information collected during calls for proposals are conserved for two years, which is the total duration of a production cycle for MOMENTA's biennial event.

6.6 Destruction: We have formulated procedures related to the destruction of data necessary to the organization's administration. These procedures are in our *Guide des bonnes pratiques en matière de protection des renseignements personnels*. The type of personal information, its location (physical or digital), and its utility for reference or for tax purposes are aspects considered before destroying confidential data. The general rule is: we aim to destroy as much personal information as quickly as possible after it is used.

6.7 Depersonalization: If there is a case in which we must conserve a document containing personal information indefinitely, depersonalization becomes the preferred option. This means that confidential data are deleted from the document, but that the document will not be destroyed.

7. Policy on cookies

A cookie is a file that is downloaded to the user's device when the user visits our website, in order to store and recover information regarding navigation on our website.

Among other things, cookies allow the website to store and recover information on the user's navigation decisions and habits. Our website host uses them to personalize the experience on our pages, to identify and memorize registered users, and to make navigation easier.

It is important to note that the use of cookies does not allow us to obtain users' personal data. Users may configure their navigator to refuse cookies. This in no way affects the content accessible on our website.

8. Your rights as a user

As a user, you have the right to access all the personal data about you that we have collected. You may also update or correct all personal information in our possession as long as this is acceptable pursuant to the law.

You can choose to delete or change your consent to collection and use of the data at any time, as long as it is legally acceptable to do so and you inform us within a reasonable time.

8.1 Right to de-index: "The right to de-index allows an individual to request that an organization stop the dissemination of one or more of his or her personal information or de-index any hyperlink attached to his or her name that provides access to that information." ([Cybereco](#), p. 10)

If you wish to withdraw any information concerning you from our website, please contact us (see point 11).

8.2 Right to data portability: "The right to data portability allows an individual to obtain a copy of his or her personal information held by an organization in an understandable format. In some cases, this right also allows an individual to request the transfer of his or her personal information from one organization to another." ([Cybereco](#), p. 12)

If you wish to obtain a copy of the personal information about you that we are holding or want us to share this information with another organization, please contact us (see point 11).

9. Processing complaints and incidents

9.1 Definition of a confidentiality incident: A confidentiality incident corresponds to all unauthorized access, use, or communication of personal information, as well as the loss of personal information or any other breach of its protection. ([Commission d'accès à l'information](#))

9.2 Notification period: If there is a confidentiality incident, the person targeted will be made aware as soon as the incident is observed. It is possible, however, that there will be a delay between the incident and the organization becoming aware of the incident.

9.3 Register of Incidents and Complaints: The Register of Incidents and Complaints is an internal document that lists all events related to personal information. The register will be shared, upon request, with the CAI or when an incident occurs.

10. Updates

This policy is subject to change in order to maintain compliance with the law and if we make changes to our data-collection process. We assure you that we will keep this policy up to date on our website.

11. Contact

If you have questions about our management of personal information, don't hesitate to contact us.

Ariel Rondeau
Manager, Protection of Personal Data
ariel.rondeau@momentabiennale.com
1 514 390-0383