

PRIVACY POLICY

CURRENT VERSION : SEPTEMBER 22, 2023



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PRIVACY POLICY

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This Privacy Policy (hereinafter the “Policy”) sets out the practices of the Quebec Professional Association of Real Estate Brokers (hereinafter the “QPAREB”) with respect to the collection, use, disclosure, and retention of your personal information. To make the Policy easier to read, we frequently use the word “we” when referring to the QPAREB.

Our Policy applies regardless of how we collect your personal information, for example, in person, by telephone, by e-mail, or via our website.

In some situations, we may provide you with additional information about the handling of your personal information when collecting it, including a separate consent form.

By accepting our Policy or by providing us with personal information after you have had the opportunity to review it or review any supplemental notices, you agree that your personal information be treated in accordance with our Policy and supplemental forms, if any.

1. How Can You Contact Our Privacy Officer?

You can contact our Privacy Officer:

By e-mail : protection.renseignementspersonnels@apciq.ca

For the Attention of the Privacy Officer.

By mail : 600, chemin du Golf

L'Île-des-Sœurs Quebec H3E 1A8

For the Attention of the Privacy Officer.

2. What Personal Information Do We Collect and for What Purposes?

2.1 Member Experience and Member Services

We process, use, disclose, and retain our members' personal information for operational purposes for the various member services we offer, including, but not limited to, member continuing education, member and educator file tracking, member experience, member finance portal, financial file, and validation of information entered into the Centris database. The personal information collected and used for the aforementioned purposes is personal information related to our service offering or the management of the member profile, including, but not limited to: last name, first name, e-mail address, telephone number, date of birth, business and personal addresses, license numbers and member information at the *Organisme d'autoréglementation du courtage immobilier du Québec* (“OACIQ”), information related to the corporation associated with the members, professional history, signature, as well as certain financial and/or payment information of the members.

2.2 QPAREB Governance

We process, use, communicate, and retain the personal information of QPAREB directors and committee members, including, but not limited to, their identification documents collected at the beginning of their mandate, in order to keep QPAREB information up to date in public corporate registers and for the payment of remuneration associated with their position, as well as their applications forms and curriculum vitae for the dissemination and evaluation of their application for a position as director or committee member.

2.3 Human Resources Management

We process, use, communicate, and retain the personal information of QPAREB employees, candidates, directors and committee members in order to, among other things, maintain employee files, evaluate and analyze pre-employment applications, and for payroll purposes. The personal information collected includes, but is not limited to: last name, first name, home address and previous addresses, e-mail address, date of birth, telephone number, social insurance number,

gender, marital status, emergency contact, curriculum vitae, employment history, criminal history, financial information related to bank accounts, specimen cheque, signature, certificates and diplomas, results of psychometric tests and other pre-employment tests.

2.4 Management of Conciliation and Arbitration Cases

We process, use, communicate, and retain the personal information of QPAREB member clients in order to, among other things, but not limited to, as exhibits or evidence for QPAREB conciliation and arbitration files. The personal information collected for this purpose includes, but is not limited to, the contact information of sellers and/or buyers included in brokerage contracts, promises to purchase, identity verification documents and other related documents. We process, use, disclose and retain the personal information of the Conciliation and Arbitration Bureau and the members of the Directory of Arbitrators and Conciliators.

2.5 Financial Management

We process, use, disclose, and retain the personal information of members, employees, directors, committee members, members of the Conciliation and Arbitration Bureau and the Directory of Arbitrators and Conciliators, service providers, subcontractors, and other business partners of the QPAREB to, among other things, manage payroll, billing, bill payment, and identity validation in certain situations. The personal information collected for these purposes includes, but is not limited to, last name, first name, telephone number, date of birth, gender, banking information, personal address, business address, licence number and other information in the OACIQ's file, as well as information relating to the business associated with the broker.

2.6 Communications and Marketing Operations

We process, use, disclose, and retain personal information about users of our website for the purpose of analyzing site traffic. Personal information collected in this way includes, but is not limited to: navigation data, geographic location, Meta account data, IP address, and browser type.

We also process, use, disclose, and retain our members' personal information to, among other things, produce timely communications for information or promotional purposes. The personal information collected includes but is not limited to: email address, last name, first name, geographical location, Meta account data, navigation data, IP address, and browser type.

Please refer to our Policy on the Use of Cookies attached hereto as Appendix A for more information on how your personal information is handled in connection with our website.

3. How Do We Collect Your Personal Information?

3.1 We collect your personal information directly from you for the purposes of:

- 3.1.1 member experience and member services when you voluntarily provide your personal information, when you become a member, when you use our services, when you contact us by email, telephone or in person, when you fill out our forms, and when you register or participate in our activities;
- 3.1.2 general governance when you voluntarily provide us, by email, by phone, or in person, at the beginning of your term or when apply for a director or committee member position;
- 3.1.3 human resources management when you voluntarily provide your personal information through your communications with us, by email, by phone, or in person, when you apply for a job with us, when you fill out pre-employment and post-employment forms, and when you submit your payroll information;

- 3.1.4 financial management when you voluntarily provide your personal information through your communications with us, by email, by phone, or in person, when you fill out our forms, when you register or use our services and our financial portal, and when you submit your information for payroll or billing purposes; and
- 3.1.5 communications and marketing operations when you voluntarily provide your personal information through your communications with us, by email, by phone, or in person, when a member joins the QPAREB, when you use our services, and when you visit our website (please refer to our Policy on the Use of Cookies at Appendix A hereto).

3.2 We collect your personal information from third parties for the following purposes:

- 3.2.1 member experience and member services: with the OACIQ and with the administrative officers or staff of the agencies responsible for your file as well as with Centris Corporation inc.;
- 3.2.2 human resources management: with digital platforms such as, but not limited to, LinkedIn, Indeed, JobBoom and Jobllico, with former employers, and with third party affiliates mentioned in section 4.2;
- 3.2.3 conciliation and arbitration: with the agencies and brokers involved in the case; and
- 3.2.4 general communications and marketing operations: Dialogue Insight, Google Analytics, Hotjar, and Meta.

3.3 Minor Under 14 Years of Age

We do not voluntarily collect the personal information of individuals under the age of 14. If you are a minor under the age of 14, you may not provide us with personal information without the express consent of a parent or guardian. If you are a parent or guardian and are aware that your children have provided us with personal information, please contact us. If we discover that we have collected personal information from a person under the age of 14 without the consent of the person having parental authority or guardian, we will take the necessary steps to remove that information from our systems.

4. Who Will Have Access to Your Personal Information Within the QPAREB and to Whom Do We Communicate Your Personal Information?

4.1 In House

Within the QPAREB, the following persons will have access, in whole or in part, to your personal information, and only when necessary to accomplish the purposes to which you have consented: employees of human resources services, finance, customer relations management and validation, conciliation and arbitration and marketing and communications departments, general management, and certain managers and members of the governance committee, as the case may be.

4.2 Third Party Classes and Service Providers

We may disclose your personal information to service providers and other third parties that we use to support our operations. To this end, here are mainly the third parties and categories of service providers to whom your information may be transmitted. You can contact us for more information about this communication.

Third Parties	Categories of Personal Information	Purposes
Providers of products and services to members and employees such as Centris Corporation inc., suppliers of transaction platforms and CRM, etc.	Certain information relating to members or employees and directors.	Allow access to services or the provision of services.
Agency manager and administrative staff of the member's real estate agency via the finance portal.	Billing information, as available on the finance portal, according to the access provided.	To facilitate communication between members and QPAREB billing management.
Hiring support service providers and candidate evaluation.	Information provided in the context of your application.	Audits as part of the evaluation of candidates.
Government institutions or other public entities such as the <i>Organisme d'autoréglementation du courtage immobilier du Québec</i> .	Information about members and their practices.	Comply with government requests and comply with our regulatory obligations.

5. What Fully Automated Decisions are Made Using Your Personal Information?

We are not currently making fully automated decisions about you. Should this change, we will inform you and you will be able to make representations to that effect in order to have those decisions reviewed.

6. What Identification, Profiling, or Location Technologies Do We Use?

We use technologies to identify, locate, or profile you through the use of cookies.

You can activate these technologies by accepting the cookies identified as being used for identification, profiling, or localization on our website's cookie banner.

For more information, please refer to our Policy on the Use of Cookies at [Appendix A](#).

7. How Long Do We Keep Your Personal Information?

We will retain your personal information until the purposes for which it was collected have been fulfilled and in accordance with our internal policies and processes to that effect. However, we may be able to retain your personal information for a longer period of time when required to comply with our legal and regulatory obligations relating to the retention or storage of information or files.

For more information on how long we retain personal information, please contact our Privacy Officer, whose contact information is provided in section 1.

You understand that your consent is therefore valid for that period, unless you exercise your right to withdraw your consent, with the consequences that such a request entails, as described below in section 10.

8. Where Do We Keep the Personal Information and Is It Transferred Outside Quebec?

Some information is held in paper format at our employees' workstations. Your personal information is also held virtually on a number of servers and platforms, including QPAREB servers and those of cloud service providers we use, as well as on the servers of third parties with whom we do business (see section 4.2 above for more information on this subject). In the context of using these platforms, your personal information may be transferred and stored outside Quebec by these providers.

Where we consider that the disclosure of your personal information outside Quebec would be necessary to support our operations, we will assess whether your personal information was adequately protected in the event of disclosure. We will only disclose your personal information if we are satisfied that it is adequately protected. Disclosure will also be governed by an appropriate contractual arrangement.

9. Protection Measures and Inherent Risks

We deploy appropriate security measures to protect your personal information. In particular, we have implemented appropriate physical, technical, and administrative safeguards to ensure the protection of personal information.

Despite these measures, given the risks inherent in using computer systems, we cannot, however, ensure or guarantee the security and confidentiality of the personal information you send or provide to us. You do so at your own risk.

If you have reason to believe that personal information has been compromised, please contact our Privacy Officer with the information listed in section 1.

10. What Are Your Rights With Respect to Your Personal Information?

The law gives you various rights with regards to your personal information. In particular, you have the following rights:

10.1 Access to Your Personal Information

You can ask us if we have personal information about you and, if so, ask for access to that personal information.

10.2 Rectification

You can ask us to correct any incomplete or inaccurate personal information we have about you.

10.3 Withdrawal of Consent

You may withdraw your consent to the disclosure or use of the personal information we have about you.

However, you understand that in such a case, you may no longer be able to benefit from our products and services. If withdrawing your consent inevitably leads to a breach of contract, you understand that contractual consequences could apply, including the termination of your membership, without compensation.

10.4 Stop Broadcasting or De-Indexing

You can ask us to stop distributing your personal information or to de-index any hyperlink attached to your name that allows access to this information by technological means, if the distribution of this information contravenes the law or a court order. You can also require that the hyperlink to this information be re-indexed if the dissemination of this information causes you serious relative harm under the right to respect for your reputation or privacy when certain legal conditions are met.

11. How Can You Exercise Your Rights?

To exercise any of your rights above, please contact our Privacy Officer at the contact information listed in Section 1.

12. How Do I File a Complaint About Our Handling of Your Personal Information?

The QPAREB takes inquiries, complaints, and comments about how we handle your personal information very seriously. We invite you to contact our Privacy Officer to submit complaints or comments on our privacy practices.

Your complaint will be reviewed by our Privacy Officer, who will determine whether the handling of your personal information is consistent with our Privacy Program and any applicable legislation.

You can also file a complaint with the *Commission d'accès à l'information du Québec* using the form available on the Commission's website. However, we invite you to please contact our Privacy Officer first.

13. External Sites or Services

This Policy does not apply to third-party websites, pages, or applications that may be accessed via our products and services, including, but not limited to, via our websites and finance portal, and we are not responsible for such third-party services. If you follow such links, these third-party sites or services will likely have their own privacy policies that you will need to review before submitting your personal information.

14. How Do We Update This Policy?

We may change our Policy from time to time at our sole discretion.

Before coming into force, the proposed changes will be published on the QPAREB website, along with a notice of change. The proposed amendments will become effective on the date specified in the relevant notice of change.

SUMMARY OF OUR INTERNAL POLICY ON THE GOVERNANCE OF PERSONAL INFORMATION

The QPAREB is committed to protecting your personal information throughout its life cycle, in accordance with its privacy practices and the requirements of applicable laws.

To this end, in addition to our Privacy Policy, the QPAREB has adopted an Internal Governance Policy on personal information, the purpose of which is to set out the principles governing the protection of personal information in the context of our operations.

The objectives of our Internal Governance Policy are:

- i. ensure that your personal information is handled properly, securely, correctly and transparently;
- ii. establish guidelines for the handling of personal information by the QPAREB throughout its life cycle; and
- iii. define the roles and responsibilities of the Privacy Officer and our staff.

1. Roles and Responsibilities

Since respecting your personal information is everyone's business at the QPAREB, our Privacy Officer is supported by a team that is fully aware of the protection of personal information and the rights of the persons concerned.

Every member of our staff has a role to play so that we can act in accordance with our privacy program. In fact, each of our employees is asked to:

- i. address any questions or comments to the Privacy Officer about how we handle or should handle your personal information;
- ii. participate in training and awareness activities on our commitment to privacy.

2. Guiding Principles of Corporate Governance

The QPAREB recognizes the importance of protecting the confidentiality and security of the personal information it handles in the course of its activities, and of making its staff and partners aware of this.

QPAREB has prepared guidelines of good practices and prohibited practices regarding how we may handle your personal information, for example:

- i. we determine the purposes and objectives sought before collecting your personal information. Your personal information is then used only in accordance with these purposes and objectives;
- ii. we seek to collect only the bare minimum in order to achieve the identified goals;
- iii. we seek your consent when collecting your personal information, and in the case of sensitive personal information, we seek your express consent;
- iv. we display our Privacy Policy in a clear and visible manner when we collect your personal information through a technological means;
- v. we ensure that our technological products or services with privacy settings offer the highest level of privacy by default, without any intervention on your part being needed;
- vi. we do not use technologies that allow identification, localization, or profiling without disclosing this practice and informing you on how to activate such features;
- vii. we conduct privacy impact assessments when required by law, and when we consider that the handling of your personal information poses privacy risks;

- viii. to the extent possible, we restrict access to your personal information only to those of our personnel and service providers who require access to your personal information in connection with our operations;
- ix. we do not disclose your personal information to third parties without your consent, except as permitted by law.

3. Privacy Incident

QPAREB has set up a process for responding to and handling confidentiality incidents.

Under this process, the QPAREB must take reasonable steps to reduce the risk of serious harm and review its practices to prevent further similar confidentiality incidents.

QPAREB documents all privacy incidents in its privacy incident log and will adapt its privacy program as necessary following a privacy incident.

APPENDIX A

Policy on the Use of Cookies and Identification, Profiling, and Localization Technologies

This Policy on the use of analytical tools and cookies ("Cookie Policy") describes how and why the Quebec Professional Association of Real Estate Brokers ("QPAREB" or "we") uses cookies, Web beacons and other identification, profiling, and location technologies on our website and in our electronic promotional communications.

Our Cookie Policy complements our Privacy Policy and should be read in conjunction with it.

1. What Do You Need to Know About Cookies and Web Beacons?

1.1 What Is a Control File and What Are Web Beacons?

Cookies are small text files that are downloaded to your device when you visit a website, use a mobile application, or download an e-mail. Cookies allow a website to recognize a device and store information (e.g., your preferences, your use of the website) and read that information each time you access the website.

There are two types of cookies: (i) primary; and (ii) third parties. Essentially, the two types are technically identical and perform the same functions; the main difference is how they are created and then used.

Primary cookies. Primary cookies are created by the website you are visiting. A website can only access cookies that it has placed on your device, so, for example, cookies placed when you visit a search engine cannot be accessed by our websites.

Third-party cookies. Third-party cookies are created by a site other than the one you are visiting and are primarily used for profiling and for behavioral advertising purposes. They also allow website owners to provide certain services. This type of cookie can be placed via what is known as a Web beacon (more on this below). Because a website can only access cookies it has set itself, we cannot access third-party cookies placed on any of our websites.

A web beacon, often referred to as a pixel invisible, is a transparent image, usually 1 pixel x 1 pixel, that is placed on a website or in an email to assess how a user interacts with specific content. Web beacons operate by sending information with the request to the third party's web server when the request for the web beacons is made.

1.2 What Can You Do to Control Cookies Placed on Your Computer?

Most browsers allow you to configure how cookies are accepted by your browser. Keep in mind that changing your cookie settings may prevent certain websites from functioning properly. Please consult your browser developer's documentation to find out how to configure your cookie settings.

You can also use your browser's private or incognito mode, which will automatically delete any cookies placed while you are in private mode when all private mode tabs are closed. See your browser's help section for details on how private mode works.

Some recent browsers have a built-in functionality to block or control the profiling content. We invite you to consult your browser's help section to see if such a feature is available.

Some browsers may have extensions created by third parties that can be used to manage and delete cookies. If you decide to use extensions, please pay particular attention to the extensions you install and the permissions they require.

You can also disable our use of cookies and similar technologies that allow us to profile and display advertising on third-party sites.

2. How Do We Use Cookies on Our Website?

2.1 Why Do We Use Cookies on Our Website?

We wish to use cookies and web beacons to:

- Analyze traffic on our website in general;
- Adjust website settings to suit your device;
- Help us understand how people use our services and interact with our promotional material, so that we can improve them;
- Analyze your interaction with other pages and websites;
- Help us personalize our approach, responses, and services by remembering your preferences.

Traffic analysis. We use cookies to understand how you interact with our website. Our partners may also use cookies to analyze your use of our website and provide us with information about your use of it.

Marketing. Our Meta and LinkedIn partners can use cookies to determine if our ads have been displayed to you and if you have interacted with them. In such cases, our partners share with us data and statistics regarding the performance of our advertisements.

With respect to information from our members: We use web beacons in our promotional e-mails to collect statistics on the opening of e-mails and the interaction with the content of e-mails in order to analyze the performance of our promotional campaigns. We use your interaction with our promotional e-mails as an indicator of your interest in our products and services. We could adjust the way we contact you based on your interaction with our promotional emails.

3. Analytical Tools to Measure Interaction With Our Website and Promotional Materials

3.1 What You Need to Know About Analytics

Analytical tools are used to collect, analyze, and measure web traffic and user visits to our website in order to understand and optimize its use. Analytical tools work by collecting information about a visitor's interactions with one or more web pages. This information includes, for example, the visitor's IP address.

3.2 What Analytical Tools Do We Use on Our Websites?

3.2.1 Google Analytics

We use the Google Analytics tool offered by Google inc. to collect information about how visitors use our website. We use the reports compiled by Google Analytics to help us improve our website.

Information is collected in an anonymous format and includes:

- the country and city from which you access our website;
- demographic information based on information Google already has about you from your interactions with other websites;
- the number of visitors to our website and the pages visited.

Further information on the information made available to us by Google Analytics can be [found on this page](#).

When we send your IP address to Google for use with Google Analytics, we anonymize it by truncating the last 3 digits. The Google Analytics Terms of Use prohibit us from sending personal information to Google through Google Analytics. Information about your interaction with our

website will be transferred to and stored by Google.

In addition, we also use the following services offered by Google Analytics:

- *Google Analytics Demographics and Interest Reporting;*
- *Google Display Network Impression Reporting; et*
- *Remarketing with Google Analytics.*

For more information on how Google treats the personal information it may hold about you as a result of the Google Analytics services it provides to us, please see Google's Privacy Policy for this purpose [available here](#).

3.2.2 Hotjar

Hotjar is a technology service that helps us better understand our users' experience (for example, how long they spend on which pages, which links they choose to click, what users like and dislike, etc.) and this allows us to build and maintain our service with user feedback.

Hotjar uses cookies and other technologies to collect data about the behavior of our users and their devices (in particular device IP address (only in anonymous form), device screen size, device type (unique device identifier), browser information, geographic location (country only), language used to display our website). Hotjar stores this information in a pseudonymized user profile.

For more details, please consult Hotjar's Privacy Policy by [clicking here](#).

3.3 How Are We Going to Use the Information We Have Obtained From the Analytics Tools?

We rely on analytical tools to obtain information about you for these main purposes:

- improve our website based on the interactions of our visitors;
- evaluate the effectiveness of our promotional campaigns;
- better understand how our visitors have come from the original campaign to becoming customers;
- establish marketing profiles and qualify potential clients; and
- to carry out targeted advertising on search engines and social media.

3.4 What Can You Do to Prevent Websites From Collecting Analytical Information?

You can take various steps to prevent a website from collecting details about your visits to our website. You can:

- control the cookies accepted by your browser (see section 2.1);
- disable profiling by installing browser extensions:
 - you can deactivate Google Analytics profiling by following the steps described on [this page](#).
 - you may object to the creation of a user profile and to Hotjar's retention of data about your use of our website and the use of cookies for profiling purposes on other websites by following [this link](#).