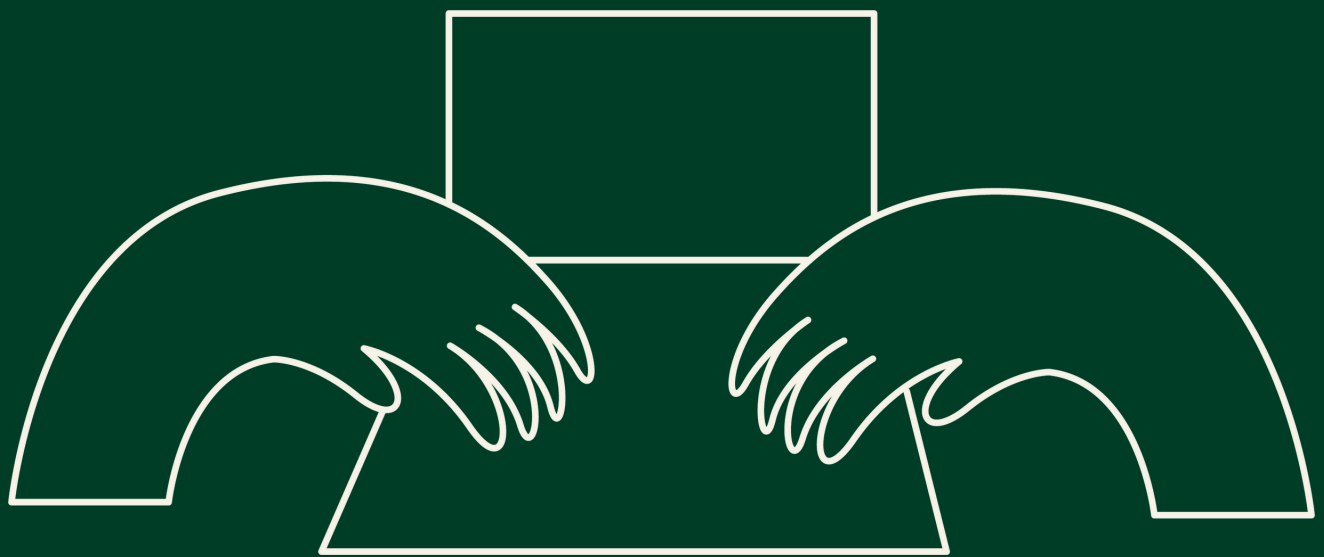


Privacy policy



Last updated: 11 February, 2025



Your Data, Our Responsibility

We are committed to protecting your personal information and respecting your privacy. This Privacy Policy explains what information we collect, how we use it, and the measures we take to protect it.

Information Collected

Personal information is collected:

- From website visitors who consent to automatic data collection;
- From newsletter subscribers
- From housing applicants;
- From Tenants;
- From Tenants who consent to participate in surveys;
- From business partners and collaborators;
- For research purposes.

For more details on the personal information collected and the purposes for which it is collected, refer to Sections 2 and 3.

Disclosures

Personal information collected by UTILE may be gathered, processed, and analyzed by our partners, where applicable. This may include disclosure outside of Quebec and disclosure without consent as permitted by law. In many cases, disclosure is incidental to collection, meaning information must be shared with the partner before UTILE can use it.

For more information, see Section 3.3.

Important Information

Personal information collected on the website is used and disclosed for identification purposes. Collection and use of personal information for identification are disabled by default. You can enable these features by consenting to the collection of personal information in the pop-up window shown when you access our Site, or through our privacy settings.

Your Rights

By law, you have the right to access, correct, and withdraw your consent regarding your personal information. For details on how to exercise your rights, refer to Sections 8 to 11 of this Policy.

You can also file a complaint by following the instructions in Section 12 of this Policy.

Implied Consent

Anyone who communicates with UTILE consents to the collection, use, and disclosure (as described in Section 3.3) of their personal information for the purposes outlined in Sections 2.2, 2.3, 2.4, 2.6 and 3.

1 Purpose of the Policy

Legal Framework: In accordance with Quebec's Private Sector Privacy Act (RLRQ c P-39.1), as amended by the Act to Modernize Legislative Provisions as Regards the Protection of Personal Information, UTILE Services (hereafter "UTILE", "we", or "our") takes measures to protect your personal information.

Purpose of the Policy: This privacy policy (hereinafter the "Policy") governs UTILE's privacy practices with regard to the personal information you voluntarily share with us during your visit to UTILE's website, <https://www.utile.org/> (hereinafter the "Site"), when communicating with us via social media, or when contacting us through other means (e.g., by phone, email, etc.).

This Policy is primarily intended to inform you about:

- The types of personal information we collect and the purposes for which it is collected;
- How your personal information is used;
- The parties to whom your personal information may be disclosed;
- The choices available to you regarding the collection and use of your personal information;
- The safeguards in place to protect your personal information;
- Your rights relating to your personal information (access, correction, and withdrawal of consent);
- Our practices for retaining and securely disposing of personal information;
- How to contact us with questions, concerns, or complaints.

2 Personal Information Collected and Its Intended Use

2.1 Personal Information Collected from Website Visitors

Automatic Collection. Through a pop-up window, website visitors may choose to accept or refuse the automatic collection of the following types of personal information when using our website:

- Information related to website browsing: For analytics purposes, to assess the volume and origin of traffic to our website, as well as its technical characteristics, we collect the following (when available):
 - IP address;
 - Browser;
 - Device;
 - Operating system;
 - Internet service provider;
 - Date and time of visits;
 - Pages visited.
- Information related to audience segmentation: For marketing purposes, including the assessment of campaign effectiveness, promotional reach, and audience segmentation, we collect the following information from visitors (when available): Language spoken, country of origin, gender (if applicable), age range and forms submitted via the website.
- Information related to website personalization: To personalize the website experience according to visitor preferences, we collect relevant preference data.

2 Personal Information Collected and Its Intended Use

Collection Through the Use of Cookies. This personal information is collected through the use of cookies. A cookie is a small data file stored on the visitor's device by the Site's server.

2.2 Personal Information collected From Newsletter Subscribers

To receive UTILE's newsletters, subscribers agree to provide their name and email address. They may also choose to share their preferences regarding the receipt of specialized newsletters.

2.3 Personal Information Collected from Housing Applicants

Mandatory Information. As part of the application process to live in a UTILE apartment, applicants are required to provide a range of personal information regarding their identity, family situation, financial situation, educational background, and international student status (if applicable). The processing of applications is conditional upon the submission of this information.

Sociodemographic Information Collected for Research Purposes. To better fulfill its mission, UTILE collects additional sociodemographic data from housing applicants. This information is provided voluntarily and is not considered during the evaluation of the application.

Customer Relationship Management (CRM) Technologies. To manage its relationships with various business partners, UTILE uses customer relationship management technologies (commonly referred to as CRM systems). Any information provided during a communication or business meeting with UTILE may be recorded using these technologies. This includes, but is not limited to, the individual's name, mailing addresses, email addresses, telephone numbers, organizational affiliation, job title or position, and meeting history.

2.4 Personal Information Collected from Tenants

The following personal information is collected on a mandatory basis as part of any rental relationship with UTILE:

Retention of Personal Information Provided During the Application Process. All personal information mentioned in the previous section (from housing applications) may be reused in the context of tenant relations.

Lease Agreement Information. By signing a lease and any related annexes, the tenant provides personal information regarding the rented unit and amenities leased from UTILE, as well as their housing conditions.

Payment Information. UTILE keeps a record of payments and payment delays for each tenant.

2 Personal Information Collected and Its Intended Use

2.4 Communications, References, Confirmations, and Community Life. UTILE retains personal information in the form of private communications between UTILE and its Tenants, reference letters, housing confirmations intended for third parties, and any other correspondence related to the tenant's community life.

Customer Relationship Management (CRM) Technologies. To manage its relationships with various business partners, UTILE uses customer relationship management technologies (commonly referred to as CRM systems). Any information provided during a communication or business meeting with UTILE may be recorded using these technologies. This includes, but is not limited to, the individual's name, mailing addresses, email addresses, telephone numbers, organizational affiliation, job title or position, and meeting history.

2.5 Personal Information Collected from Tenants for Survey Purposes

As part of their residency in our buildings, Tenants may be invited to complete various surveys aimed, in particular, at gathering feedback regarding their housing conditions, satisfaction with the services provided, and any other relevant comments. Survey responses may include personal information voluntarily provided by Tenants and are used exclusively to improve services.

2.6 Personal Information Collected from Business Partners and Collaborators

Customer Relationship Management (CRM) Technologies. To manage its relationships with various business partners, UTILE uses customer relationship management technologies (commonly referred to as CRM systems). Any information provided during a communication or business meeting with UTILE may be recorded using these technologies. This includes, but is not limited to, the individual's name, mailing addresses, email addresses, telephone numbers, organizational affiliation, job title or position, and meeting history.

2.7 Personal Information Collected for Research Purposes

Research in Support of the Organization's Mission. UTILE collects personal information from students surveyed as part of research projects that support its mission to improve housing conditions for the student population by developing sustainable, high-quality, and needs-adapted living environments. These surveys are conducted with students independently of any rental relationship with UTILE.

Sociodemographic Information Collected for Research Purposes. This information may include the student's age, geographic location, means of transportation, housing situation, family status, financial situation, educational status, and international student status.

3 Why We Collect Personal Information and Who We Share It With

3.1 What Are the Purposes of Personal Information?

Purposes of Personal Information. We also collect personal information for the following purposes:

- To assess the functionality, effectiveness, and usability of our website;
- To evaluate the reach and traffic of specific pages on our website;
- To assess the effectiveness and efficiency of our marketing operations;
- To evaluate the reach of our newsletters and analyze subscriber engagement;
- To analyze and segment housing applicants;
- To analyze and segment Tenants;
- To respond to specific requests from Tenants;
- To provide Tenants with personalized information or offers;
- To generate reports and statistics related to the occupancy of our buildings;
- To promote the services offered by UTILE;
- To ensure effective management of our housing portfolio;
- To ensure effective management of our relationships with clients and partners, at both departmental and organizational levels;
- To generate reports and statistics related to research projects;
- To publish reports and statistics for partners and the general public.

3.2 Collection and Use of Personal Information for Identification Purposes

Authorization for the Collection of Personal Information for Identification Purposes. Due to the use of the above-mentioned cookies, we use visitors' personal information for identification purposes. The collection and use of personal information for identification purposes are disabled by default. You may activate these functions by consenting to the collection of personal information for identification purposes in the pop-up window that appears when you access our Site. You may also enable this feature in our privacy settings.

3.3 Who We Share Personal Information With

Partners Involved in the Collection, Processing, and Analysis of Information. UTILE may engage partners for the collection, processing, and analysis of personal information, particularly in the context of research projects. These partners are bound to UTILE by data protection and confidentiality agreements.

Incidental Disclosure During Collection. The collection of information may involve incidental disclosure to a partner, meaning the information must be shared with the partner before being used by UTILE. This includes situations where the partner provides hosting services, data collection forms, data transmission services, or data processing services on behalf of UTILE. Partners may also transfer the information directly to other service providers working with UTILE, for example, when two software platforms are integrated.

Disclosure Outside Quebec. As a result, your personal information may be disclosed outside the province of Quebec.

Disclosures Without Consent Permitted by Law. We may also disclose your personal information without your consent in circumstances where such disclosure is authorized or required by applicable law.

4 Consent

Consent. Any individual who uses the Site or communicates with UTILE voluntarily consents to the collection, use, and disclosure of their personal information for the purposes outlined above and to the entities identified herein (see Sections 2 and 3).

5 How Long Do We Retain Personal Information?

Destruction of Personal Information Upon Fulfillment of Its Purpose, Unless a Legal Retention Period Applies. In accordance with our secure retention and destruction procedures, we retain personal information only for as long as necessary to fulfill the purposes for which it was collected and to comply with our legal obligations. Once this period has ended, personal information is securely destroyed.

6 How Do We Ensure the Protection of Your Personal Information?

Safeguards. We implement physical, technological, and administrative safeguards to protect your personal information and reduce the risks of unauthorized and/or unlawful access, use, disclosure, or destruction. Without limiting the generality of the foregoing, we:

- **Minimization:** Consciously limit the personal information we collect. We only collect personal information necessary to fulfill the purposes identified in Section 3 – Why We Collect Personal Information and Who We Share It With
- **Confidentiality Undertakings:** Require each member of our team and all our representatives with access to your personal information to sign a confidentiality agreement.
- **Training:** Ensure that each member of our team and all our representatives with access to your personal information have received or will receive training in privacy and personal information protection, and offer them multiple annual training sessions to maintain this level of awareness.
- **Access Limitation:** Limit access to your personal information to employees who require it to carry out any of the purposes listed in Section 3 – Why We Collect Personal Information and Who We Share It With
- **Privacy Incident Log:** Maintain a record of privacy incidents in compliance with applicable legislation. In the event of a privacy incident that presents a risk of serious harm to you, we will take the necessary measures to notify you in accordance with applicable legislation.

7 Your Privacy Choices

Modifying Your Privacy Settings. All visitors to the website may choose the privacy settings that best suit their needs at the following link: <https://www.utile.org/?cookies=open>. By default, these settings are configured to offer the highest possible level of protection. These settings do not allow you to modify how personal information is processed by cookies.

Modifying Cookie Settings in Your Web Browser. You can manage how cookies process your personal information by adjusting your browser settings. For more information on how to modify your browser settings, please refer to the documentation provided by your browser. For example, you may consult guidance [here](#) (if you use Google Chrome), [here](#) (if you use Mozilla Firefox), or [here](#) (if you use Microsoft Edge). However, refusing cookies may impair or limit your access to certain functions of our website.

8 How to Withdraw Your Consent to the Use or Disclosure of Your Personal Information

Right to Withdraw Consent. Subject to applicable legal and contractual obligations, you may withdraw or modify your consent to the use or disclosure of your personal information. To do so, please contact our Privacy Officer. Instructions are provided in Section 11 – **Procedure for Requesting Access, Correction, and Withdrawal of Consent**. Please note that withdrawing your consent for certain uses or disclosures of your personal information may impact our ability to provide you with certain services, or may affect the quality of those services. We will inform you of any such consequences before processing your request.

9 How to Access Your Personal Information

Scope of the Right of Access. You have the right to access your personal information. In this regard, you may ask us to:

- Confirm whether we hold personal information about you;
- Provide you with access to the personal information we hold about you;
- Allow you to review your personal information either on-site during business hours or remotely, and to obtain a copy of it;
- As of September 22, 2024 only, provide you with any personal information collected directly from you (excluding personal information that has been created or inferred from such information) in a structured, commonly used technological format. As of that same date, you may also ask us to transmit this information in such a format to any person or organization legally authorized to collect it.

Applicable Fees. Reasonable fees may be charged for the transcription, reproduction, or transmission of your personal information. We will inform you of any applicable fees before proceeding.

Applicable Procedure. Any request for access must be submitted to our Privacy Officer in accordance with the procedure outlined in Section 11 – Procedure for Requesting Access, Correction, and Withdrawal of Consent. Please note that in some cases, the law may prevent us from granting an access request.

10 Submitting a Request to Correct Your Personal Information

You may submit a request to correct your personal information. You may ask us to correct your personal information in the following circumstances:

- The information is inaccurate;
- The information is incomplete;
- The information is ambiguous;
- The collection, disclosure, or retention of the information was not authorized by law.

Destruction of Personal Information. As part of your correction request, you may also ask us to delete any personal information that was collected, disclosed, or retained without legal authorization.

Provision of a Copy or Confirmation. If your request for correction is granted, you may also request a copy of the updated personal information or, where applicable, confirmation that the information has been deleted.

Applicable Procedure. Any correction request must be submitted to our Privacy Officer using the procedure set out in Section 11 – Procedure for Requesting Access, Correction, and Withdrawal of Consent. Please note that we may be legally prevented from granting a correction request in certain circumstances.

- 10 Submitting a Request to Correct Your Personal Information
- Applicable Procedure.** Any correction request must be submitted to our Privacy Officer using the procedure set out in Section 11 – Procedure for Requesting Access, Correction, and Withdrawal of Consent. Please note that we may be legally prevented from granting a correction request in certain circumstances.
- 11 Procedure for Requesting Access, Correction, and Withdrawal of Consent
- Procedure.** To be processed, all requests under Sections 8 to 10 must be submitted in writing to Paolo Miriello, UTILE's Privacy Officer, by email at renseignements.personnels@utile.org.
- Identity Verification.** You will be required to verify your identity before we can process your request.
- Response Timeframe.** We are legally required to respond (whether granting or denying the request) within 30 days of receiving it and confirming your identity. We may refuse a request in accordance with applicable privacy laws.
- 12 Complaint Procedure
- Filing a Complaint.** You may file a complaint regarding our governance practices or the protection of personal information by contacting Paolo Miriello, UTILE's Privacy Officer, by email at renseignements.personnels@utile.org.
- Questions or Requests for Assistance.** You may also contact our Privacy Officer if you have any questions about your rights to access, correct, or withdraw consent. The Privacy Officer can assist you in clarifying your request or, if applicable, help you understand the reasons for a refusal related to one of these rights.
- 13 Updates to This Policy
- Possible Changes.** We may update this Policy from time to time in accordance with applicable law. We will notify you of any changes by indicating the date of the most recent update at the top of this Policy. If we have your email address, we will also send you a notice identifying any changes made to this Policy.
- Implied Consent to Changes.** Your continued use of the Site or your provision of personal information following the posting of changes to this Policy will constitute your implied agreement to the revised Policy, subject to the requirements of applicable law.
- 14 Caution Regarding Third-Party Websites
- Disclaimer.** UTILE is not responsible for any personal information that may be collected, used, disclosed, or retained by any third-party website you visit. UTILE expressly disclaims all liability relating to such collection, use, disclosure, or retention by that third party.

