PRIVACY POLICY

At Sépaq, we are committed to protecting your privacy with the same rigour with which we protect Québec's natural treasures. We successfully carry out this important part of our mission, year after year, thanks to your complete trust.

We therefore invite you to consult our improved and updated Privacy Policy.

FULL PRIVACY POLICY

Sépaq is committed to respecting your privacy. The purpose of this Privacy Policy (the "Policy") is to inform you of Sépaq's commitment to privacy and the protection of personal information. It is intended to help you better understand Sépaq's practices regarding the collection, use, communication, and retention of your personal information.

The Policy applies to personal information that Sépaq collects and holds about you, i.e. information that directly or indirectly allows you to be identified.

Also available for consultation:

Cookie Usage Policy | Cookie management tool

Terms of use | Privacy governance rules regarding the protection of personal information

1. COLLECTION AND USE OF PERSONAL INFORMATION

1.1 Means by which personal information is collected

Personal information collected by Sépaq is provided directly by you, either verbally or by filling in blank fields on various Web pages or forms, notably when you

- make a booking or purchase.
- use Sépaq's websites, applications, or transactional platforms.
- contact Sépaq's Customer Relations Centre or Sépaq's establishments by telephone or email.
- create and use your Sépaq account online.
- visit one of Sépaq's establishments, participate in certain activities, rent certain equipment, or take part in an event in which Sépaq is involved (outdoor shows, hunting and fishing, etc.).
- browse Sépaq's website, through the use of cookies.
- complete surveys, studies, or contest entry forms.
- subscribe to Sépaq email communications (newsletters, magazines, etc.).
- contact Sépaq with a comment, question, or complaint, or when an event or incident occurs at one of Sépaq's establishments.
- submit a job application.

1.2 Consent

The collection of certain personal information is subject to specific consent. Sépaq undertakes to use only the personal information that is necessary for the purposes for which it was collected. In the event that Sépaq wishes to use your personal information for a purpose other than that described in this Policy, Sépaq must obtain your prior consent.

If you decide to refuse or withdraw your consent as regards the collection, use, or sharing of your personal information, Sépaq will provide you with relevant information explaining the consequences of such withdrawal. Please note, however, that if you refuse to allow Sépaq to collect certain essential personal information (such as your contact information), Sépaq may not be able to provide you with the products or services you have requested.

1.3 Managing your preferences

At any time, by connecting directly to your Sépaq account, you can consult your profile, manage your camping bookings, and/or modify your subscription preferences for certain Sépaq emails such as our magazines, newsletters, and surveys. There may be a delay before your subscription preferences are updated.

You can also contact Sépaq to update your personal information or modify or delete certain information collected, by calling the Customer Relations Centre or by sending an email to confidentialite@sepaq.com.

1.4 Categories of personal information

Sépaq has grouped the personal information it may collect from you into categories, along with the purposes for which it is collected.[1]

Information categories	Examples of information[2]	Purposes for which your information is collected

1. Identification information	• First and last name • Email and postal address • Phone number	• Be able to serve you and offer you the products and services you request. • Send you important information about your booking or the services you request. • Send you surveys following your visit or use of Sépaq's services to assess your level of satisfaction and other elements relating to the quality of your customer experience. • Contact you or send you important notices concerning your safety or the accessibility of Sépaq's establishments (major incident, service interruption, etc.). • Create a Sépaq account. • Send you communications related to the products and services you have purchased. • Carry out studies, conduct analyses, or produce statistics.[3]
2. Payment information	• Billing information and credit/debit card number	• Complete payment for the product or service requested.
3. Information on your communications, preferences, and consumption	• Information about your subscriptions to our communications Information on products and services purchased Responses to surveys or studies[3]	• Analyze and understand the different profiles, buying behaviors, and needs of our customers. • Send you useful and relevant communications based on your profile and preferences. • Enhance your customer experience and improve Sépaq's products, services, and content. • Offer you advertising and content corresponding to your interests.
4. Information on your use of our websites or applications[4]	• Information collected through cookies • Navigation preferences (language, province) • Browsing and browsing history on our websites or applications • IP address • Information about your device, operating system, or browser	• Ensure the proper functioning of our websites. • Ensure easy navigation. • Analyze navigation data. • Provide you with targeted advertising content and offers. • Measure the performance of online advertising campaigns.
5. Information on activities such as • Via ferrata, zipline, or Arbraska; • Equipment rental[5]	• Age • Name(s) of accompanying person(s) • Booking number • Weight and size • Emergency contact(s) • Allergy(ies) and medication(s) • Medical history	• Ensure your safety. • Transmit essential information to emergency services when required. • Contact identified persons in case of emergency. • Report confirmed risks.
6. Information on hunting, fishing, or entering a random draw	• Date of birth • Hunting or fishing licence number • Licence plate	• Ensure that activities are carried out in compliance with our processes and regulations.
7. Information on your use of our Explo application	• Location data • Language preference • National parks and establishments visited	• Locate you on our trails in participating national parks so as to make certain hikes interactive.
8. Information when an event or incident occurs at one of our establishments (theft, accident, etc.)	• Age • Gender • Spoken language(s) • Description and physical and/or psychological condition • Medical history • Vehicle information (e.g. licence plate number, if relevant to the context) • Other relevant information about the event or incident	• Document an event or incident. • Take the necessary steps to manage the event or incident.
9. Information in reply to a question, comment, or complaint	• Information you share with Sépaq about your question, comment, or complaint	• Reply to your question, comment, or complaint.

10. Information with respect to external suppliers or corporate customers	Social insurance number (supplier) Specimen cheque or bank details (supplier) Payment information (credit card number) (corporate customers)	Identify and make payment to supplier. Produce tax statements or any other documentation required under applicable legislation.
11. Information on applying for a position at Sépaq	Your curriculum vitae, including any personal information you may have included	Analyze and process your application.

[1] Please note that if certain categories do not apply to you, Sépaq does not collect the personal information associated with them. In addition, several categories of personal information may apply.

[2] Certain personal information included in each category of information may be communicated to third parties or to persons authorized to receive it by law, for the purposes indicated in this table.

[3] Personal information used for research, analysis, or statistical purposes is de-identified, i.e. it is no longer possible to identify you directly.

[4] For more information, see our Cookie Usage Policy.

[5] The personal information collected may depend on the context of the activity.

1.5 Access to your personal information

Personal information collected by Sépaq is accessible to its employees or representatives who require it in the performance of their duties. Employees or representatives must at all times ensure the confidentiality of such information and must undergo regular training and awareness-raising activities concerning the security and protection of personal information.

2. DISCLOSURE OF PERSONAL INFORMATION

Sépaq may share your personal information with third parties, service providers, or partners as part of its activities and mission.

2.1 Communication with the responsible ministry

Sépaq manages random draws for special hunting and trapping licences on behalf of the Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs (MELCCFP).

Sépaq also collects personal information in collaboration with the MELCCFP for random draws to award big-game hunting stays in wildlife reserves and at Sépaq Anticosti, as well as day fishing at Lac au Sorcier in Réserve faunique Mastigouche.

Sépaq collects and communicates certain personal information for and on behalf of the Ministère des Ressources naturelles et des Forêts (MRNF) in the case of random draws for vacation lots on public land.

2.2 Communication with suppliers and partners

Sépaq may share your personal information with its service providers or partners.

Certain communications require your consent. However, certain personal information may be communicated to suppliers without your consent, in accordance with the *Act respecting Access to documents held by public bodies and the Protection of personal information*, when such communication is necessary for the performance of a mandate or the execution of a service or business contract entrusted to Sépaq. These suppliers use your personal information only to provide the services they have retained, which are related to the purposes described in this Policy.

For example, Sépaq may communicate your personal information to the following suppliers:

- Suppliers for call and booking processing.
- Service providers for payment processing.
- Suppliers for communications, email, and cookie management.
- Service providers for our marketing needs.
- In-house activity providers.
- Suppliers for satisfaction surveys and other studies.
- Suppliers of IT products and services.
- Cloud computing, Web hosting, and data processing services.
- Legal services.
- Talent acquisition software providers.
- Service providers for customer relationship management (handling complaints, comments, or questions).

When Sépaq communicates your personal information to these suppliers, it ensures that the contracts include the necessary protection clauses to ensure the confidentiality of your personal information.

2.3 Communication with authorities and other bodies

In certain specific situations, Sépaq may have to disclose your personal information without your consent, in particular in the following cases:

- To regulatory authorities, government ministries, or public bodies that request it from Sépaq under powers granted to them by law or when the information is required for the application of a law.
- To the police if the information is required for an investigation they are conducting, or if the information is the subject of a search warrant or disclosure order.
- To the extent provided or required by law, in accordance with the *Act respecting Access to documents held by public bodies and the Protection of personal information*.

2.4 Communications outside Québec

Some of your personal information may be communicated or stored outside Québec by Sépaq or by a person or organization to whom Sépaq may entrust the task of collecting, using, communicating, or storing such information.

In such a case, Sépaq ensures that your personal information is suitably protected, in particular with respect to generally accepted principles of personal information protection that are deemed reasonable in the circumstances.

3. RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

3.1 Retention of personal information

Personal information held by Sépaq is stored on secure servers usually located in Canada. However, Sépaq may retain the services of suppliers located outside the country.

Sépaq will keep your personal information secure for as long as it is needed to carry out its activities, fulfill its mission, and provide you with its services. Sépaq will retain your personal information in accordance with the retention schedule approved by Bibliothèque et Archives nationales du Québec. These periods are provided in particular to allow Sépaq to comply with certain legislative or regulatory requirements or to produce this information as evidence in the event that Sépaq is party to a claim or lawsuit.

3.2 Destruction of personal information

Once the useful life of personal information has expired, Sépaq ensures that it is destroyed or anonymized. Destruction or anonymization is carried out in a secure manner, in accordance with applicable best practices.

4. PRIVACY PROTECTION MEASURES

Sépaq is responsible for protecting the personal information it holds. It implements security measures to ensure the protection of your personal information as it is collected, used, communicated, stored, and destroyed.

Sépaq has implemented the following protection measures:

Physical protection measures	• Surveillance cameras • Security personnel (certain establishments) • Access map to our offices and establishments • Locking binders • Alarm system
Technological protection measures	• Securing all IT components (workstations, servers, network, etc.) according to best market practices • Password on all workstations for local and remote access to all information • Multi-factor authentication • Access management • Monitoring and control to prevent and detect suspicious activity
Employee protection measures	• Code of ethics and professional conduct • Cybersecurity guide • Mandatory training and awareness activities • Confidentiality and security incident management process

5. REQUEST FOR ACCESS AND RECTIFICATION OF YOUR PERSONAL INFORMATION

You may at any time contact the persons responsible for access to documents and the protection of personal information, for any request for access to information concerning documents held by Sépaq or concerning your personal information.

You may consult the personal information that Sépaq has collected about you and ask Sépaq to update or correct it. To do so, you may address your request in writing and forward it to the persons responsible for the application of the *Act respecting Access to documents held by public bodies and the Protection of personal information* at Sépaq, i.e.

Person responsible for access to documents and protection of personal information
Marika Bussière, Director of Legal Affairs and Contract Management **Société des établissements de plein air du Québec (Sépaq)** Place de la Cité, Tour Cominar 2640, boul. Laurier, bureau 1300 Québec (Québec) G1V 5C2 bussiere.marika@sepaq.com

6. HANDLING COMPLAINTS AND QUESTIONS

In order to constantly improve the quality of its services, Sépaq attaches great importance to customer complaints and comments. To make a complaint regarding the protection of personal information, we invite you to write to the following email address: confidentialite@sepaq.com.

For more information on the complaints handling process, please consult Sépaq's Privacy governance rules.

If you have any questions about this Policy or our personal information handling practices, you can contact Sépaq by email or post, as follows:

Société des établissements de plein air du Québec
2640, boulevard Laurier, bureau 1300
Québec (Québec) G1V 5C2
Email: confidentialite@sepaq.com

7. MODIFICATION OF THE POLICY

Sépaq reserves the right to modify the Policy at any time to reflect significant changes in its internal and external environment. Sépaq will notify you in advance of any significant changes.

The changes are effective as of the date indicated below.

We invite you to consult the Policy regularly to ensure that you are familiar with the most recent version.

Policy last updated: September 11, 2023