

# **Privacy Policy**

This document is the official Personal Information Protection Policy of Bloom Mediation to protect clients, mandates and their loved ones obtained during its activities in compliance with the Act respecting the protection of personal information in the private sector and the code of ethics of the Ordre des travailleurs sociaux et thérapeutes conjugaux et familiaux du Québec (OTSTCFQ). Respect for privacy and the protection of your personal information are a priority for us, which is why this Policy is intended to inform you of the purposes and the way Bloom Mediation uses your personal information in order to ensure informed consent from users.

In this Privacy Policy, the term "Personal Information" refers to any information relating to an identifiable person. A person is considered identifiable when the information can reasonably be used to identify that person, either independently or in conjunction with other data.

During our activities, it may be necessary to obtain certain private, personal and confidential information. It is our strict duty to collect only the information necessary for the execution of our mandates, and when required, to share this information with collaborators who meet the same legal, ethical and moral requirements.

In order to comply with the requirements of the applicable laws on the protection of personal information, the purpose of this policy is to inform the persons from whom it collects personal information from, of the following:

- How their personal information is collected, used and communicated;
- What rights they have regarding their data;
- Who is responsible for processing the personal information collected;
- To whom this information is transmitted:
- The use of cookies\* on our website.



By browsing our website or using our systems or services, you acknowledge that you have read and understood this policy and consent to the processing of your personal data and information in accordance with it.

### 1. Protection of confidentiality

In accordance with Law 25, we inform you that Juliana Zappitelli, will be the sole individual responsible for protecting the confidentiality of your personal information and that you have specific rights regarding your personal data:

- Right to be informed
- Right of access
- Right to rectification
- Right to data portability

You have the right to object to the use of your data and to withdraw it.

To exercise these rights, to consult, modify or delete your data, or to send us a question, comment or complaint about this policy, contact the person responsible for the protection of personal data at Bloom Mediation:

Name: Juliana Zappitelli

Email: jzappitelli.mediation@gmail.com

**Telephone:** 514-771-3785

#### 2. In the event of a data breach

In the event of a confidentiality incident, Juliana Zappitelli undertakes to keep a register of all incidents and to take prompt action to reduce the risk of harm being caused to the persons concerned. In addition to informing you directly, Juliana Zappitelli will notify the Commission d'accès à l'information of any incident or cyber-attack threatening the confidentiality of your confidential data and the persons concerned in cases where there is a risk of serious harm resulting from the incident.



#### 3. What personal information is collected?

Bloom Mediation may collect personal information in various ways; however, will only do so by authorized means and solely for the purposes of its activities. The personal information collected, as well as its sensitivity, may vary depending on the context of the interactions between you and Bloom Mediation.

The following information may be collected using forms and through the interactivity established between the user and our website:

• First name and surname, email address, city of residence, telephone number, and other similar data used to communicate with you and to schedule a family mediation appointment via our online calendar.

The following information may be collected through technologies such as cookies\* and your interactions with us on social media or on the web, including third party sites:

• Internet Protocol (IP) address, browser type, browser version, the pages of our site you visit, the time and date of your visit, the time taken to visit the site and any other statistics.

\*Cookies and other technologies mean the use of cookies, web beacons, pixels, log files or other technologies to collect certain personal information about visitors to our websites and about the recipients of our invitations and other communications. Cookies are pieces of information sent by the server to the browser during a visit to the website that uniquely identify the current connection.

#### 4. What do we use the data for?

The information we collect is used in accordance with the purposes and objectives set out in this privacy policy and these are the reasons why we collect your personal information:



- For the purposes of providing our professional services, i.e. setting up a family mediation appointment via the online appointment platform.
- We use "cookies" to collect information anonymously and establish a
  profile of visitors to our site, improve the service and personalized
  welcome, create a personalized consumer profile, create applications and
  collect statistics. Users do not have to accept cookies to browse the site,
  but if they do not, they may not be able to use certain functions, such as
  personalisation functions.

#### 5. How do we do this?

We ensure your consent. We prefer to obtain explicit consent, whether verbally, electronically or in writing. However, implied consent may be reasonably inferred from an individual's action. For example, asking us a question using your personal email address or sending us your contact details for an appointment is considered implied consent to the collection of information containing personal information. Rest assured, however, that if we need your consent for a new purpose, we will inform you of the intended use and ask for your consent again.

#### 6. Control, protection and access to personal information

We undertake to take all necessary measures to protect personal information and not to sell or share your data with third parties except as required by law or in the event of legal proceedings. We may, however, disclose to any member of our organization or sub-contractors, user data, when reasonably required to carry out the purposes set out in this policy.

It should be noted that our website cannot guarantee that security measures will be able to prevent an ill-intentioned third party from obtaining and taking possession of the information exchanged and stored.



### 7. Request for access, withdrawal or correction

Subject to any regulatory or contractual restrictions, you may consult, correct or destroy the personal information we hold about you. We will respond to your request within a maximum of thirty (30) days from the date of receipt of the written request and in a structured and commonly used technological format. A fee may be charged for processing your request.

In certain specific circumstances, we may refuse to provide you with the requested information. Exceptions to your right of access include the fact that information may not be disclosed for legal or security reasons. These limitations are described in the Act respecting access to documents held by public bodies and the protection of personal information (RLRQ, C. A-2.1) and in the Act respecting the protection of personal information in the private sector (RLRQ, C. P-39.1).

Any person has the right to obtain their personal information electronically held by Bloom Mediation in a structured and commonly used technological format, unless this raises serious practical difficulties.

#### 8. Links to other websites

Our website may contain links to other websites. This privacy policy applies only to our website and does not apply to websites suggested by related links appearing on our website. We are not responsible for their privacy practices.

Our website uses the external platform WIX and Google (emails). As we are not responsible for the terms and conditions of these platforms or their privacy policies, users should read their terms of use before browsing our site or using the contact form.

Please consult WIX's Privacy Policy here: <a href="https://www.wix.com/about/privacy">https://www.wix.com/about/privacy</a>

## 9. Changes to this Privacy Policy

Our website reserves the right to modify this Privacy Policy to conform to changes in legislation, ethics or practice at any time by posting a new Privacy Policy on our site without notice or notification. The collection, use and disclosure of your information by our site will be subject to the version of the Privacy Policy that is then posted and in effect. It is therefore important to consult the section of our website that contains the most recent provisions in force.



## 10. Conservation of personal information

We keep all our client files in our secure system for 7 years.

### 11. Written document

The user may keep this confidentiality policy in text form by printing the complete document. However, this policy, or its amended version, may be found on our site for online consultation at any time.

Our confidentiality policy was updated on May 1 2024.