

PRIVACY POLICY

Last update: November 12, 2023

At Recherche et Action sur les Polarisation Sociales ("**RAPS**", "**we**"), we respect your privacy and are committed to maintaining your trust, which is why we have implemented a comprehensive privacy program and appointed a Privacy Officer to respond to your questions, comments and complaints about your privacy.

This privacy policy (the "Policy") describes our privacy practices regarding the collection, use, storage, sharing and protection of your Personal Information by RAPS on our Hadit and Ras-le-Bol websites, including on our linked forums or chat functions (the "**Site**").

Personal information

For the purposes of this Policy, "Personal Information" means any information about an identifiable individual, including any information that directly or indirectly identifies such individual.

Personal Information Management Program

In order to protect your Personal Information, we have put in place policies, practices and procedures relating to the management of the Personal Information we hold.

These internal policies and procedures govern the collection, use, disclosure, retention and destruction of personal information, as well as complaint handling, information security and data governance at RAPS. They also provide the framework for the implementation of Privacy Impact Assessments, where required, as well as the prevention of and response to potential privacy incidents. All these policies and practices have been approved by our [Privacy Officer](#).

The collection of your Personal Information through our Site, Application and Platform complies with the requirements of this program.

Privacy Officer

Our senior executives have delegated the management of the privacy [program](#) to the Privacy Officer. His duties consist of managing and monitoring RAPS's internal personal information management program.

It is the Privacy Officer who approves and implements privacy policies and procedures, ensures their proper functioning and reports to RAPS senior management on the effectiveness of the program.

It is also the responsibility of the Privacy Officer to provide you with the necessary support in the event of a question, complaint or request relating to the protection of personal information:

Privacy Officer

RAPS

here@hadit.ca or ici@ras-le-bol.ca

We are committed to responding promptly to your requests.

Upon receipt of a complaint, the Privacy Officer will conduct an investigation. If the complaint is justified, the situation will be corrected. Regardless of our conclusion, we will keep you informed.

Basis for processing Personal Information

RAPS needs to collect and process some of your Personal Information in order for you to use our Site and to provide our services.

When we collect your Personal Information, we ensure that we collect only the information necessary to fulfill one of our purposes, which has been previously disclosed to you, for example, in this Policy. We use Personal Information in accordance with the privacy laws applicable to our business.

The following is a description of the basis on which RAPS collects and processes your personal information:

Your consent

As required by applicable privacy legislation, RAPS collects the majority of your Personal Information on the basis of your voluntary consent, favouring collection directly from you.

For example, RAPS undertakes to obtain your explicit consent for the collection of any Sensitive Personal Information, in particular where your health is concerned.

Other permissible legal basis, such as the performance of our contracts

As permitted by applicable privacy laws, RAPS may collect Personal Information without your express consent, for example, to comply with obligations under applicable laws or to fulfill our contracts.

Personal information collected

Depending on the nature of your activity on the Site and your browsing history we may collect your Personal Information, including:

- **Identifying Information:** your contact details such as your first and last name, your e-mail address, your telephone number, your social network account identifier and other similar information;

- **Information relating to the use of the Site and your browsing history:** for example, date and time of visits, geolocation data (with your consent), duration of presence on the Site, pages clicked and connection IP address).
- **Information relating to the use of your mobile devices:** for example, the type of mobile device, unique identifier, IP address, operating system and physical location of the device (geolocation, beacon location) as well as mobile identifiers such as Apple IDFA or Google Android AAID, where applicable.
- **Information related to your health:** for example, relevant clinical information about your state of health, medical history, known treatments and illnesses, your treating physician and the results of any tests we carry out on your behalf.

If you choose to provide us with Personal Information through our website, we'll use that information to respond to your message or obtain your requested information. Any personal information that you do provide is kept strictly confidential and is not disclosed to anyone except to those RAPS staff who need the information for legitimate business purposes (such as responding to your request). We do not trade or sell information to any second or third party.

Personal information of minors

In view of the importance of protecting children's privacy, we do not intend the Site for use by minors under 14 years of age. The nature of our services and our Site could, however, affect minors under 14 years of age.

In cases where RAPS may collect personal information from minors, we will require the express consent of the parent, guardian or minor 14 years of age or older, as applicable.

If a parent or guardian discovers that his or her minor child under 14 years old has provided us with Personal Information without our having obtained the appropriate consent, such parent or guardian has the right, upon request, to inspect the Personal Information provided by the child and/or to require that it be deleted from our files. In this case, we ask the child's parent or guardian to contact us at the coordinates indicated in the section "[Privacy Officer](#)".

Purposes of collecting Personal Information

We only collect Personal Information that we consider necessary for the following purposes:

- To offer our services via the Site;
- To answer your questions, queries, comments or complaints ;
- To achieve our mission and objectives, such as counselling people who want to move away from harmful belief systems , improving or modifying our services;
- For data analysis purposes, including the identification of usage trends, and to determine the effectiveness of our awareness-raising campaigns and our interventions;

- To send you administrative information, for example, information about our services and changes to our terms, conditions and policies;
- To send you communications that we think may be of interest to you, such as newsletters, or direct mailings ;
- To send you messages by email or SMS ;
- For audit, surveillance and fraud prevention purposes;
- To comply with or act under any applicable law or regulation, including but not limited to:
 - (i) respond to requests from public and governmental authorities, including public and governmental authorities outside your country of residence;
 - (ii) to protect our operations and legitimate interests or those of our subsidiaries ;
 - (iii) to enable us to pursue available remedies or limit the damages we may suffer, etc.
- To facilitate and improve the use of our Site, as long as the Information collected is used proportionally to this Purpose;
- To prevent violence or emergency situations concerning you or another person;
- For any other purpose to which you have consented;

If we wish to use your Personal Information for a purpose not mentioned above and for which you have not consented, we will ensure that we seek appropriate consent from you or inform you of the change, where permitted by law.

Disclosure of Personal Information

Sharing your information with our Trusted Partner

Your Usage, Communications and Technical data will be shared with our Trusted Partner Moonshot CVE Ltd (hereinafter “Moonshot” or “Trusted Partner”), a company based in London, UK, and subject to the *General Data Protection Regulation* (EU) 2016/69 (GDPR) and to the *UK Data Protection Act* (2019) (UK GDPR) and other European privacy and data protection laws when processing personal data. Moonshot will use this data to help us provide services, customize the Site and its contents, and to communicate with you. Additional Volunteered Data that you share with us will not be shared with Moonshot or other third parties, except where that has been data aggregated, anonymized, and it is necessary to share this data to provide our services.

Sharing your information without explicit consent

In certain cases, we may disclose categories of personal data listed above in order to prevent an act of violence. Acts of violence include suicide, and occasions where there is reasonable cause to believe that there is a serious risk of death or serious bodily injury threatening a person or an

identifiable group of persons, and where the nature of the threat generates a sense of urgency. Where we process your personal data for this purpose, our legal basis for processing will be authorized expressly by the applicable law, such as disclosure without consent in Quebec. We will report this data to the concerned law enforcement agency.

Sharing and disclosing of your personal information

In the course of our activities, we may need to disclose and share your personal information with various stakeholders. We will only disclose and share your personal information as described below:

- **Our Employees and Multi-disciplinary Team** : In the course of their work, our employees and multi-disciplinary team may need to access your personal information, for example, when you call us, or chat with us. Their access is limited to what is necessary to perform their duties.
- **Third Party Agents and Service Providers**: From time to time, we may need to share your personal information with agents or service providers to assist us in making available all of the features of our website (maintenance, analysis, legal requirements, fraud detection, marketing and development). Please note that these service providers may be located in Canada or in other jurisdictions or countries. They will only have access to personal information that is necessary to perform these functions on our behalf and are required not to disclose or use it for any other purpose. Please be aware that we have contractual agreements with these vendors to ensure the security of your data.

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Quebec and Canadian privacy legislation.

- **When required by law, to enforce compliance or to protect the property or safety of our rights or those of others**: By way of example, we may disclose personal information to legal or regulatory authorities in the event that we suspect criminal activity, to detect and prevent fraud, or to comply with legal or regulatory requirements of governmental bodies, regulatory agencies or other self-regulatory organizations. We may also need to disclose personal information to comply with a legal obligation (e.g., court order) or to protect our assets (e.g., to collect overdue accounts).

Retention and Destruction of Personal Information

RAPS will retain your Personal Information only for as long as is necessary to fulfill the purposes for which it was collected, in accordance with our internal document retention policies, to comply with legal, tax or regulatory requirements applicable to us or until you request us to destroy it. After such period, any personal information concerned and held by RAPS will be destroyed, deleted or anonymized.

Security

The security of your Personal Information is a priority for us.

Your Personal Information is hosted by our service providers who are committed to using reasonable security measures to preserve the integrity and confidentiality of your Personal Information.

Our employees and suppliers are informed of the confidential nature of the Personal Information collected and are made aware of the appropriate security measures to prevent unauthorized access to Personal Information.

In addition, our service providers and partners undertake to use reasonable security measures to preserve the integrity and confidentiality of your personal information. We maintain our services and all associated data with technical, administrative and physical safeguards to protect you against loss, unauthorized access, destruction, misuse, alteration and improper disclosure of your personal information. These safeguards vary according to the sensitivity of the data in our possession and are based on the best industry standards.

Access to your personal information is limited to people who have a genuine need to know it. Any use of your personal information will only be done by an authorized person who is subject to a duty of confidentiality.

If you have any questions about the security of your interaction with us (if, for example, you believe that the security of any account you may have with us has been compromised), you may contact us at here@hadit.ca or ici@ras-le-bol.ca.

Your rights regarding your Personal Information

Depending on applicable laws, where you live and how you interact with the Site, Application or Platform, you may be granted certain rights with respect to the Personal Information we hold about you.

For example, you may be entitled to:

- Obtain **access** to the Personal Information we hold about you;
- To **correct** Personal Information we hold that is inaccurate, misleading or incomplete;
- Request the **deletion of** your Personal Information;
- To **obtain additional information, for** example on the categories of third parties to whom we communicate your Personal Information;
- To **object to the processing of** your Personal Information carried out on the basis of our legitimate interests and ask us to restrict the processing of your Personal Information;
- To request the **portability of** your Personal Information in a structured, commonly used and machine-readable format;
- To **withdraw your consent** at any time, if we have collected and processed your Personal Information with your consent. Withdrawal of your consent will not affect the lawfulness of the processing we carried out prior to your withdrawal, nor the processing of your Personal Information carried out on the basis of legitimate processing grounds other than consent.
- To **refuse promotional communications** from RAPS ;
- **File a complaint with a privacy control authority**, such as a privacy commissioner or the Commission d'accès à l'information.

File a complaint

You may file a complaint with [Privacy Officer](#) of RAPS if you are dissatisfied with our handling of your Personal Information or compliance with this Policy.

You are also entitled by law to lodge a complaint with a privacy commissioner or any other competent supervisory authority for the protection of personal information.

Exercising your rights

You may review, correct, update, modify or delete the Personal Information you have provided to us using your account. Simply log in to your account and make the changes.

You can also exercise your rights listed above by sending a written request to our [Privacy Officer](#). He or she will be happy to assist you in any way he or she can.

For your protection, we will only process requests to exercise your rights from the same e-mail address you use to log in to your account. We may also need to verify your identity before processing your request. Depending on the applicable laws, we will inform you of the procedure to follow, the processing time and the information required, if any. We aim to respond to requests promptly, usually within 30 days.

In the context of the processing activities covered by this Policy, RAPS does not make decisions based solely on automated processing producing legal effects or similar significant effects.

Your choices regarding our use and disclosure of Personal Information

Links to other Sites

This Site contains links to other websites. RAPS is not responsible for the content and the privacy practices of other websites and encourages you to examine each website's privacy policy and disclaimers and make your own decisions regarding the accuracy, reliability, and correctness of material and information found.

Embedded content from other websites

Articles on this Site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website. Messages sent via the Internet can be intercepted. If you're concerned about sending your personal information to us over the Internet, you can use another method such as phone or regular mail.

Cookies

A cookie is a small text file that is stored in a dedicated location on your computer, mobile device, tablet or other device when you use your browser to visit an online service. This Policy includes in the term "**Cookie**" other tracking technologies, including but not limited to web beacons and tracking pixels. These tracking technologies are not necessarily stored on your computer or device. Any Personal Information we collect using Cookies or on our behalf is treated with the same level of confidentiality as any other Personal Information we hold.

a. Essential cookies

These Cookies are necessary for the operation of the Site and provide basic functions and may include connecting to our Platforms, maintaining your session and preventing security threats. We cannot disable these Cookies in our systems without affecting the operation of the Site. However, if you wish, you can block or delete them by changing your browser settings and forcing all Cookies on the Site to be blocked.

b. Non-essential cookies

Non-essential Cookies provide certain non-essential functionalities on our Site, for functional, analytical or advertising purposes. We will ask for your consent before using these Cookies.

- **Functional Cookies:** We use these Cookies to facilitate non-essential functionalities of our Site, Application or Platforms, such as the integration of content such as videos or the sharing of Site content on social media.

- **Advertising Cookies:** Our Site displays advertisements. These Cookies help us to track the effectiveness of our advertising campaigns and to personalize our ads so that they are meaningful to you.
- **Analytical cookies:** These cookies store information such as the number of visitors to our site or the page they have visited. They help us to understand and analyze the performance of our Site, Application and Platforms and our potential improvements.

c. How to manage Cookies

You can manage and deactivate Cookies through your browser's Cookie settings and your mobile device's advertising settings. However, if you refuse Cookies, you may not be able to use all the features of the Site or Platforms, and you will continue to receive advertising, but it will no longer be as tailored to your needs.

Your online advertising choices

We may collect your Personal Information to offer you advertisements about goods and services and may work with online advertising companies to present you with relevant and useful advertisements. This Personal Information is collected either directly from you or as described above in the section "[Cookies](#)".

We may also use your mobile advertising ID to target and measure the effectiveness of advertising campaigns. On iOS, this identifier is called "IDFA" (ID For Advertising); on Android (Google Play), this identifier is called "AAID" (Android Advertising ID).

You can control the collection and use of online advertising by expressing your preferences in your mobile devices. You can also control the use of your mobile advertising ID by resetting the IDFA or AAID or restricting its use in your mobile device settings.

Changes to this Privacy Policy

We revise the Policy from time to time to comply with applicable laws and our operations. If we update this Policy in a material way, we will notify you by sending you a notice either on our Platforms, Site or Application or by e-mail. However, in all other circumstances, the posting of a new version of the Policy on our Site or your continued use of the Application, Site or Platforms will suffice as notice and consent to the Policy changes.

Technical support

If you have any questions about your personal file on the Application or about matters relating to your contractual working relationship with your employer, such as your name, address, telephone number, availability and shift, please contact your employer directly.

If you have any questions regarding a technical problem with the Application or your access to or use of its functions, please contact us at the following address: here@hadit.ca or ici@ras-le-bol.ca.