

PROCEDURE FOR REQUESTING TO ACCESS  
PERSONAL INFORMATION AND COMPLAINTS  
PROCESSING

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# OUTREACH

This procedure is intended to be a frame of reference for internal parties responsible for handling access requests and complaints procedures, as well as individuals who wish to access their own personal information collected in the course of services provided by the Clinique juridique Juripop and Avocats Juripop (collectively referred to as “Juripop”). The goal of this procedure is to guarantee that all access requests are treated confidentially, promptly and accurately, while respecting the rights of the individuals concerned.

A copy of this procedure can be consulted on the Techno-IT Security Channel on Microsoft Teams. When it is updated, an announcement is made on Teams.

This procedure is adopted in accordance with the obligations of the Loi sur la protection des renseignements personnels dans le secteur privé, RLRQ, c. P-39.1 (la « Loi sur les renseignements personnels »).

## ACCESS REQUEST PROCEDURE

### Step 1: Submitting the Request

An individual who wishes to access its personal information (hereinafter referred to as PI) collected at Juripop must submit a written request to the person responsible for PI protection, i.e. the person occupying the position of Operations Manager.

The request must be sent by e-mail to the following address: confidentialite@juripop.org. It must clearly indicate that it is a request for access to personal information and provide sufficient information to identify the individual and the information sought. This information may include name, address and any other information relevant to reliably identifying the individual making the request.

### Step 2: Receipt of the request

Once the request has been received, an acknowledgement of receipt is sent to the individual to confirm that the request has been processed. The request must be processed within thirty (30) days of receipt. If this deadline cannot be met, it is essential to inform the individual throughout the process.



### Step 3: Identity verification

Before processing the request, the individual's identity must be reasonably verified. This may include verification of the following :

1. Details of last collaboration ;
2. Amount of last invoice;
3. Notice of assessment number;
4. 2 proofs of residence (lease/notarized deed, driver's license, electricity bill, etc.);
5. Request for confirmation of identity in person;
6. Any other document deemed relevant.

If identity cannot be satisfactorily verified, Juripop may refuse to release the requested personal information.

### Step 4: Responding to incomplete or excessive requests

If a request for access to personal information is incomplete or excessive, the Privacy Officer will contact the individual to request additional information or clarification of the request. Before disclosing all personal information held by Juripop, it is possible to confirm with the individual concerned whether he or she requires this specific information or whether an enumeration of the categories of personal information held would be adequate. Juripop reserves the right to refuse a request if it is manifestly abusive, excessive or unjustified.

### Step 5: Processing your request

Once identity has been verified, the manager consults the relevant files to gather the personal information requested, taking care to respect any legal restrictions.

### Step 6: Information review

Before disclosing personal information to the individual, the person in charge carefully examines the information to ensure that it does not contain any third-party confidential information or information likely to infringe other rights. If third-party information is present, the person in charge assesses whether it can be dissociated or whether it should be excluded from disclosure.



## Step 7: Communication of personal information

Once the verifications have been completed, the personal information is communicated to the individual within a reasonable timeframe, in accordance with applicable legal requirements. Personal information may be communicated to the individual electronically, by secure mail or in person, depending on the individual's preferences and appropriate security measures.

## Step 8: Follow-up and documentation

All stages in the process of handling a request for access to personal information must be recorded accurately and completely. The details of the request, the actions taken, the decisions made, and the corresponding dates must be recorded in an access request tracking log.

1. Date request received;
2. Date of acknowledgement of receipt;
3. Date of identity verification;
4. Method of identity verification;
5. Decision - access request accepted or refused;
6. Date of release of information (if applicable).

## Step 9: Protecting confidentiality

All staff involved in processing requests for access to personal information must respect confidentiality and data protection.

## Étape 10: Complaints and remedies

If an individual is dissatisfied with the response to his or her request for access to personal information, he or she must be informed of the complaint procedures and remedies available before the Commission d'accès à l'information. Complaints must be handled in accordance with our internal complaint management policies and procedures (see next section).

# COMPLAINT PROCESSING PROCEDURE

## Step 1: Receipt of complaint

Complaints may be submitted in writing, by e-mail or via any other official communication channel. They must be recorded in a centralized register, accessible only to designated personnel. The person receiving the complaint must immediately inform the person responsible for the protection of personal information.

## Step 2: Preliminary assessment

The person responsible of the complaint reviews each complaint to assess its relevance and seriousness. Complaints that are frivolous, defamatory or have no obvious basis may be rejected. However, a justification must be provided to the complainant.

## Step 3: Investigation and analysis

The person responsible of the complaint leads an investigation by gathering evidence, by interrogating the parties involved and by collecting all relevant documents. The person responsible has the necessary authority to resolve the complaint and must be impartial. The person responsible must maintain the confidentiality of information relating to the complaint and ensure that all parties involved are treated fairly.

## Step 4 : Complaint resolution

The person responsible of the complaint proposes appropriate solutions to resolve the conflict as quickly as possible. The solutions can include corrective measures or any other necessary action to resolve the complaint in a satisfactory way.

## Step 5 : Communication with the complainant

The complaint manager communicates regularly with the complainant to keep him or her informed of the progress of the investigation and resolution of the complaint. All communications should be professional, empathetic and respectful.

## Step 6 : Closing the complaint

Once the complaint has been resolved, the person in charge of the complaint must provide a written response to the complainant, summarizing the measures taken and

the proposed solutions. All information and documents relating to the complaint should be kept in a confidential file.

## ACKNOWLEDGMENT OF RECEIPT

I have received a copy of the Personal Information Destruction Policy. I understand that the terms and conditions described therein form part of my employment contract and may be amended by Juripop from time to time.

Juripop may require an additional signature from me at the time of any change, to indicate that I have read and understand the new policy or rules.

I understand that my signature below indicates that I have read and understand this policy and this acknowledgement of receipt.

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Name of employee

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Signature

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Date

