



THE TRANSITION PLATFORM

PRIVACY POLICY

The CMC Surgical Complex brings together 3 entities under one roof:

- The **Metropolitan Surgery Center** is the only private hospital center in Quebec. It has four surgery rooms and a one-day surgery unit and an inpatient unit with a capacity of 17 beds.
- **GRS Montreal** is dedicated exclusively to gender affirmation surgery.
- **The Asclepiade Convalescent Home** is a setting designed to provide post-surgical recovery to patients who have had genital surgery.
- The CMC Surgical Complex (" **CC-CMC** "; " **we** "; " **our** " and " **Our** ") is committed to protecting the confidentiality and security of your personal information. This Privacy Policy (the " **Politics** ") describes how we collect, use, and disclose your personal information, and how it can be accessed and corrected when required. This Policy also explains how cookies ("cookies") are used on our websites and on our TransAvenue Blog.

By accessing, consulting or visiting websites <http://www.complexechirurgicalcmc.com/>,
<https://www.grsmontreal.com/>,

<https://www.cmcmontreal.com/>, <https://www.drbrassard.com/>, <https://monarch.grsmontreal.com/> and/or <https://blog.grsmontreal.com/> (collectively the " **Web site** "), by contacting us or agreeing to receive emails from CC-CMC, you agree to the terms and conditions of this Policy. The website and the various associated services are collectively referred to as the " **Services** ".

This Policy does not apply to websites operated by third parties. Therefore, CC-CMC is not responsible for their privacy policies, procedures, or practices. We do not collect, use, or disclose your personal information without your consent except as required or authorized by law.

This Policy is incorporated into and subject to our other applicable terms and conditions, such as the terms of use of our Website. In this Policy, terms beginning with a capital letter, without being defined, have the meaning given to them under the conditions mentioned above.

1. **Collection of personal information**

In general, when you access, visit, or use our Services, we may collect the following data:

On the site <https://www.grsmontreal.com/>

- Section of the "Contact us" page: we may collect your name, first name, your email address, the city, province and country of residence, the subject of your contact request as well as the content of the message sent to us.

- When you contact us by telephone: we may collect your name, first name, your email address, your email address, the city, province and country of residence, the subject of your contact request as well as the content of the message that is indicated to us as well as any other information that you provide to us.
- “Submit a testimonial” section: we may collect your name, first name, email address, city, province and country of residence, the subject of your contact request as well as the content of the message sent to us.

On the blog <https://blog.grsmontreal.com/>

- Newsletter subscription: when you subscribe to the newsletter, we collect your email address.
- “Contact us” section, specific to the Blog: we may collect your name, first name, email address as well as the content of the message sent to us.

On the site <https://www.cmcmontreal.com/>

- “Careers” section: we may collect your name, first name, gender, language (s) spoken and written (s) (French, English), postal, telephone and electronic coordinates, your diplomas and professional experiences, membership in a professional order as well as any other information that you provide to us.
- Section of the “Contact us” page: we may collect your name, email address, the subject of your contact request as well as the content of the message sent to us.
- When you contact us by telephone: we may collect your name, your first name, the subject of your contact request as well as the content of the message sent to us as well as any other information that you provide to us.

On the site <https://www.drbrassard.com/>

- Section of the “Request Information” page: we may collect your name, first name, email address, city, province and country of residence, the subject of your contact request as well as the content of the message sent to us.
- When you contact us by telephone: we may collect your name, first name, your email address, your email address, the city, province and country of residence, the subject of your contact request as well as the content of the message that is indicated to us as well as any other information that you provide to us.

On the Monarch platform (the “Platform”), a GRS Montréal platform

- By using the Platform, by contacting us or by agreeing to receive emails from GRS Montréal, you agree to the terms and conditions set out in this Privacy Policy.
GRS Montréal only collects personal information that you transmit via the Platform or that has been communicated by your health professionals.
More specifically, the information collected concerns, among other things, data relating to your medical file as a patient (pre-per-post-operative phases), as well as certain data related to your lifestyle (demographic data, language spoken, profession, profession, profession, family environment, gender identity, etc.).

Data collected automatically

- We also collect data when you visit our Website, including your IP address, the date, time, and duration of your visits, and the pages you viewed.
- Our Website uses cookies or similar technologies (“cookies”) to offer you a richer browsing experience, improve the performance of our Website and generate audience statistics. These are files that are installed on your computer's hard drive or on your browser to collect information, such as your preferred language, browsing history, and browser type and version, and whose purpose is to optimize your experience on our Website. You can ask your browser to refuse all cookies or to indicate when a cookie is being sent.

Examples of cookies we use:

- **Necessary Cookies** — These cookies are necessary for the proper functioning of the Service and for the security of the Website. For example, essential cookies are used to ensure the functionality of a change from http to https, or to remind you of your cookie preferences if you are asked to accept or refuse certain cookies. We are not required to obtain your consent for these cookies.
- **Statistical Cookies** — Statistical cookies help us, by collecting and reporting information anonymously, to understand how visitors interact with the Website.
- **Marketing Cookies** — Marketing cookies are used to track visitors through the Website. The aim is to show ads that are relevant and interesting for the individual user and therefore more valuable for third-party publishers and advertisers.

Some of our cookies are third party cookies, which means that they are placed on your device by someone other than us. For example, we use Google Analytics cookies to assess the performance of our Website. This is a web analysis service offered by Google that tracks and reports traffic on the Website. Google uses the data collected to track and control the use of our Service. For more information about Google's privacy practices, please see the [Google Privacy and Terms of Use web page](#).

We will only keep cookies for as long as necessary to fulfill the relevant purposes set out in this Privacy Policy.

2. Use and disclosure of personal information

We take steps to ensure that only health professionals at CMC Surgical Complex and employees working there who need to consult your personal information in the course of their duties have access to it. We use and disclose your personal information primarily:

- to operate, maintain, improve, and offer all of the features of the Website, to provide the services and information you request, to respond to comments and questions, and to provide support to users of the Website;
- to understand and analyze the usage trends and preferences of our users, to improve the Website, and to create new products and services and new features and functionalities;
- to send you communications, subject to applicable laws;
- for any other purpose permitted or required by law.

When sharing your personal information with service providers, we take reasonable steps to ensure that the rules set out in this Policy are followed. Below is a list of our third party service providers who may process your personal information (with links to their privacy policies):

1. Vortex Solution: Site Hosting and Design <https://www.vortexsolution.com/information-legale/>
 - Google Analytics: Compilation of anonymous visitor data.
 - <https://support.google.com/analytics/answer/6004245>
 - <https://policies.google.com/privacy>
 - <https://policies.google.com/terms>
 - <https://safety.google/principles/>
 - <https://support.google.com/analytics/answer/181881> (to deactivate Google Analytics tracking)
 - Mailchimp: Optional blog mailing list. <https://mailchimp.com/legal/>
 - WordPress: Website engine. <https://fr.wordpress.org/about/privacy/>
 - Sendinblue: SMTP relay for blog emails.
 - <https://fr.sendinblue.com/legal/privacypolicy/>
 - <https://fr.sendinblue.com/legal/termsofuse/>
 - com (Microsoft) :Email servers.
 - <https://privacy.microsoft.com/fr-ca/privacystatement>
 - <https://www.microsoft.com/en-us/legal/intellectualproperty/copyright/default.aspx>

In the event of a change in ownership, sale, merger, liquidation, liquidation, reorganization, or acquisition of CMC Surgical Complex, in whole or in part, your personal information may be transferred as part of the transaction.

3. Consent

Consent may be express or implied and may be provided directly by the individual or by their authorized representative. Implied consent can be reasonably inferred from an individual's action or inaction, for example, providing a name and address to receive a publication or a name and telephone number to obtain an answer to a question.

We will not use your personal information without your consent except:

- whether they are to be used for the same purposes for which the information was originally collected or compiled;
- whether the use is compatible with that purpose; when required or authorized by law.

If we want to use personal information for a new purpose, we will describe the intended use and ask for consent again.

4. Retention and destruction of personal information

We will only use, disclose, or maintain your personal information for as long as necessary to fulfill the purposes for which it was collected and as permitted or required by law. If you would like more

information about the periods for which your personal information will be retained, please contact us using the contact details in the “Contact Us” section below.

5. Information security

We have implemented physical, organizational, contractual, and technological security measures in an effort to protect your personal information and other data from loss or theft, unauthorized access, disclosure, disclosure, copying, copying, use, and modification. We have taken steps to ensure that only health professionals and employees of the CMC Surgical Complex who need to consult your personal information in the course of their duties have access to it.

6. Transfer of personal information

Your personal information is currently stored in Quebec (Canada). Where appropriate, they may be stored and processed in any country where we have facilities or where we use third party service providers. In the latter case, your personal information could be transferred to countries outside of your country of residence, which may have different personal information protection rules than those in your country. If this data is located outside of your country, it is subject to the laws of the country in which it is located and may be subject to disclosure to the governments, courts, or law enforcement or regulatory agencies of that other country in accordance with the laws in force in that other country. However, our practices with respect to your personal information will continue to be governed by this Privacy Policy at all times.

7. Protection of the personal information of minor children

Our Services are not directed to persons under the age of 14 (“children”). If you are a minor under the laws applicable to your place of residence, please do not provide any personal data to us without the express consent of a parent or guardian.

We do not voluntarily collect personal data from individuals under the age of 14. If you are a parent or guardian and you know that your children have provided us with personal information, please contact us. If we learn that we have collected personal data from minor children without verifying parental consent, we take steps to remove that information from our servers.

8. Rights of access and correction

Upon written request and presentation of proof of identity, you may access the personal information that we hold about you and, if applicable, request that the necessary corrections be made to it, as authorized or required by law. However, to keep the personal information we hold about you accurate and up to date, please let us know promptly of any changes.

Portability

As of September 22, 2024, you will have the right to receive your personal information in a structured, commonly used, and computer-readable format. Each request made in this regard must be made by email to the following address: confidentialite@cmcmontreal.com. A form will then be sent to you in order to provide us with all the relevant information related to your request.

Upon receipt of the duly completed form, we will make every effort to respond to your request, however, it being understood that serious practical difficulties may limit our ability to respond to it.

9. Our roles and responsibilities

We are responsible for personal information collected, maintained, maintained, used, disclosed, and destroyed. We will continue to develop policies and practices to ensure that this information is handled in strict compliance with the Private Sector Privacy Act. The Privacy Officer is responsible for monitoring the application of these policies and practices to ensure compliance with them.

Employees — Health professionals and staff who collect personal information will need to explain why the information is being collected. Health professionals and employees should report any violation of this Policy to their manager.

Managers and supervisors — In addition to the responsibilities mentioned above, managers and supervisors must inform health professionals and employees of the obligation to comply with the Privacy Policy and the Act on the Protection of Personal Information in the Private Sector

Personal Information Protection Officer — The person responsible for the protection of personal information will provide advice and direction to senior managers, managers, supervisors, health professionals, and employees. This person will also be the first point of contact for individuals who want information about, or have concerns about, the handling of their personal information.

10. Social media

Like any social media user, it is possible for us to see who is subscribed to our GRS Montreal and CMC Surgical Complex pages, and how users interact with our posts. In particular, we have access to the names, first names and profiles of subscribers, likes, comments and shares, and the number of times a publication is displayed (on LinkedIn). If you visit our Website from one of our social media posts, be aware that we use certain trackers to:

- know which social media posts work best;
- assess the effectiveness of our advertising campaigns.

Facebook, LinkedIn and Instagram have their own privacy policies.

11. Update

We will update this Policy from time to time to reflect changes in our practices, technology, legal obligations, and other factors. Please check the “Last Updated” statement at the bottom of this page to find out when this Policy was last updated. Unless otherwise specified, any changes to this Policy are effective as soon as they are posted on this page, in an update to the Policy. By using the Website following a change, you are consenting to the practices set out in the updated Policy.

12. Communication

To ask questions or make comments about this Policy or your personal information, to request access or correction, to file a complaint, or to obtain information about our policies and practices concerning our service providers outside the province of Quebec, contact the Privacy Officer by email at the following address confidentialite@complexechirurgicalcmc.com or by post to the following coordinates:

CMC surgical complex
To the attention of the Privacy Officer
999 De Salaberry Street
Montreal (Quebec), Canada H3L 1L2