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International Centre for the Prevention of Crime

EMPLOYEE DATA PRIVACY POLICY

Final version

Adopted by resolution of the Board of Directors on September 21 2023; comes into force on 22 September 2023

1. INTRODUCTION

1.1) This Employee Data Privacy Policy ("the Policy") has been revised with effect from: 22 September 2023.

1.2) The purpose of this policy is to describe the information that the International Centre for the Prevention of Crime as an employer, holds about its employees, how it handles it, why it collects it, what it does with it and how it keeps it secure.

1.3) The International Centre for the Prevention of Crime will ensure that it complies with all applicable human rights laws, privacy laws and regulations in the collection and use of the information it collects. As a general principle, the International Centre for the Prevention of Crime also ensures that it respects the integrity and confidentiality of its employees and uses its employees' personal information appropriately.

1.4) This policy is not a contract of any kind and no rights, conditions or obligations arise from this policy. If an employment or other contract exists between the International Centre for the Prevention of Crime and its employees, that contract will be enforced in conjunction with this policy.

Any inconsistencies will be dealt with by the International Centre for the Prevention of Crime. Employees may report inconsistencies if necessary.

2. SCOPE

2.1) This policy applies to all workers, independent contractors, potential employees, staff, executives, agents, consultants, interns, participants in knowledge transfer activities organized by the International Centre for the Prevention of Crime, as well as research subjects who participate in projects via surveys or interviews, who are required to disclose information to the International Centre for the Prevention of Crime for work-related purposes (hereinafter referred to as "employee"). This policy applies equally to all staff members, whether full-time or part-time, temporary or permanent, and also applies to potential employees who are in the recruitment process and have received a conditional offer.

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2.2) Any use of employees' personal information outside the parameters of this policy or an employment contract will only be made with the express written consent of the employee.

2.3) This policy applies to third parties with whom any employee deals, including emergency contacts.

3. COLLECTION OF PERSONAL INFORMATION

3.1) The collection of personal information may be necessary in the course of doing business, which may occur during the recruitment process, payroll processing and the use of IT technology and equipment of the International Centre for the Prevention of Crime. The information collected may also include personal information required for enrolment in an insurance scheme or participation in the Company's share option scheme, where applicable.

3.2) The personal information that the International Centre for the Prevention of Crime collects about its employees is as follows:

For the purposes of this Privacy Policy, the term "personal information" means any information or collection of information in any form, oral, electronic or written, relating to the individual, but does not include information that is publicly available in its entirety. Personal information also includes any publicly available information that is combined with non-publicly available information.

Personal information includes, but is not limited to, name, home address and telephone number, home e-mail address, identity verification information, social insurance number, age, gender, salary, education, job title, personal hobbies and activities, medical history, employment history, credit history, resume content, references, interview notes, performance evaluation notes and emergency contact information.

3.3) The information collected is required and will form part of the employee file. Specifically, information is collected for the following purposes:

Personal information will be collected, used and disclosed for purposes related to the individual's employment relationship with the Company, including, but not limited to, administering employee recruitment, performance evaluation, administering employee payroll, processing employee benefit claims, and for the purpose of complying with all applicable labour and employment laws and legislation.

3.4) Employee information may be created by the International Centre for the Prevention of Crime, such as job title, job function, etc., while an employee is on duty.

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3.5) The information that the International Centre for the Prevention of Crime collects will only be for the purposes set out above and any additional information that the International Centre for the Prevention of Crime requests will be on the consent of its employees.

4. INFORMATION HELD AND STORED

4.1) Personal information held by the International Centre for the Prevention of Crime on its employees is filed and stored with the company in physical form in a filing cabinet or in electronic form in the International Centre for the Prevention of Crime database or in both forms with physical copies in the employee's file.

4.2) Access to stored data is limited to authorised personnel of the International Centre for the Prevention of Crime, including human resources.

4.3) Only information necessary for the proper functioning of the International Centre for the Prevention of Crime, workplace activities or compliance with the law will be held and stored.

4.4) The International Centre for the Prevention of Crime will hold the personal identification information of all applicants, employees, prospective employees, contractors, agents, etc., which includes names, addresses, nationality, and more. Recruitment information, including employment status, educational history, former employers and university transcripts, will be retained and stored. Financial information for payroll and tax purposes will also be retained and stored, including salary, benefits, pensions and insurance schemes. Internal employment information, such as probation review, job performance, job evaluations, promotions or demotions, training records, etc., will be documented and archived. Information and history of leave, whether short or long term, will be kept on file. This may include family responsibility leave, critical illness leave, bereavement leave and more. Other information relating to resignation or dismissal, disciplinary action, legal proceedings or grievances will be kept on file.

4.5) Any personal or professional information created for business purposes on the premises of the International Centre for the Prevention of Crime or during the performance of duties for the International Centre for the Prevention of Crime, whether or not such duties are performed on the premises, shall be retained, stored and archived.

4.6) After an employee leaves the International Centre for the Prevention of Crime, information shall be retained and stored only for as long as is reasonably necessary. Any continuing relationship, such as a conversion from employee to self-employed, will justify the continued retention of such personal information. A legal obligation imposed on the International Centre for the Prevention of Crime will also justify the continued retention of personal information.

4.7) Information will be retained for seven (7) years from the date of departure.

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5. DISCLOSURE OF PERSONAL INFORMATION

5.1) Personal information that the International Centre for the Prevention of Crime collects from its employees will only be disclosed in circumstances where it is necessary to do so.

5.2) Disclosure may be necessary to comply with governmental or other law enforcement agencies.

5.3) Personal information may need to be disclosed to third parties who can assist the International Centre for the Prevention of Crime in recruiting new employees, contractors, workers, officers, agents, etc., and in providing general background information, as well as to family relatives, emergency contacts, regulatory agencies, courts, law enforcement agencies, insurance companies, payroll and accounting, and other institutions relevant to the proper functioning of the International Centre for the Prevention of Crime.

5.4) In the course of providing information to third parties, where legally permitted, the International Centre for the Prevention of Crime will notify employees of such disclosure and the reasons for it.

6. CONSENT

6.1) From time to time, express consent will be required prior to the collection, use or disclosure of specific personal information that is used for any purpose outside the parameters of this Policy and general employment duties. The knowledge and consent of employees will be a prerequisite to the collection of any additional personal information.

6.2) There is implied consent to the collection of information during the recruitment phase where a prospective employee provides personal information to the International Centre for the Prevention of Crime, as part of the recruitment process; this includes CVs, covering letters, references, where applicable.

7. ACCESS TO INFORMATION

7.1) Access to information means employee access to information held by the employer.

7.2) The International Centre for the Prevention of Crime allows its employees to access the information held in the files in order to verify the information and to challenge its accuracy and completeness, if necessary. However, only the information necessary for the purposes of collecting the information in the first place will be amended by the International Centre for the Prevention of Crime.

7.3) Personal information retained is kept accurate, current and complete. Please inform the International Centre for the Prevention of Crime of any changes to an employee's personal information.

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8. POSSIBILITY OF LODGING A COMPLAINT ABOUT NON-COMPLIANCE

8.1) Receipt of enquiries and complaints

- a) All enquiries, concerns and complaints should be forwarded to the Privacy Officer immediately upon receipt.
- b) The Privacy Officer shall encourage, but not require, individuals to submit enquiries, concerns and complaints in writing.
- c) Any person may also file a complaint in writing with the Privacy Officer in accordance with the applicable laws on the protection of personal information.

8.2) Processing requests for information and complaints

- a) When an individual makes an enquiry, expresses a concern or files a complaint about a possible breach of confidentiality by an employee, director or third party, the Privacy Officer shall refer the individual to and comply with section 8.2 of the Policy.
- b) Unless the Privacy Officer determines that there are reasons to handle the enquiry, concern or complaint in another manner, the International Centre for the Prevention of Crime will investigate all concerns and complaints.
- c) The Privacy Officer will conduct an initial review of all concerns or complaints within a reasonable period of time. In all cases, the Privacy Officer will inform the person who filed the concern or complaint of the progress of the review, indicating the expected date of completion of the review.
- d) If a concern or complaint is not resolved to the satisfaction of the individual concerned, the Centre shall: i. record the subject of the unresolved concern or complaint in the relevant files concerning the individual concerned; and ii. where appropriate, inform any third-party having access to the personal information in question of the existence of the unresolved concern or complaint.
- e) The International Centre for the Prevention of Crime keeps a register in which it records all incidents of confidentiality involving personal information, even incidents that do not present a risk of serious harm. The organization may be required to provide a copy of the register at the request of the *Commission d'accès à l'information du Québec*.

9. CONTACT

If you have any questions or concerns about this policy or the way in which information is stored or kept confidential, please do not hesitate to contact the International Centre for the Prevention of Crime using the contact details below. We will respond to queries as soon as possible.

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Privacy Officer: Kassa Bourne, Director of Administration and Finance

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