



Version : 1	Section :	PROTECTION OF PERSONAL INFORMATION AND ACCESS TO INFORMATION	Issuer : Secrétariat général et vice-présidence Services juridiques Approved by the Management Committee: August 22 nd , 2023
	Subsection :	PROTECTION OF PERSONAL INFORMATION	
	Subject :	DIRECTIVE ON SURVEYS	

1. PREAMBLE

As part of its activities and mission, the Société des alcools du Québec (the “SAQ”) conducts Surveys, on an ongoing or ad hoc basis, to assess, among other things, the satisfaction of its customers, business partners and employees, as well as other quantitative or qualitative elements.

2. SUBJECT

In order to fulfill its obligations with respect to the protection of Personal Information, the SAQ has adopted this directive on surveys which:

- Introduces ethical questioning into the Survey normative process;
- Establishes specific privacy protection measures for Surveys that involve the collection or use of Personal Information, taking into account:
 - The need for a Survey;
 - The ethical aspect of this Survey, particularly given the sensitivity of the Personal Information collected and the purpose for which it will be used;
- Sets out the SAQ’s values and principles that should guide the ethical assessment of a Survey;
- Defines the roles and responsibilities of stakeholders in this process;
- Offers a constructive approach to evaluation, followed by a checklist for ethics respondents.

3. STANDARD FRAMEWORK

This directive stems from the SAQ’s Personal Information Governance Policy and is governed by the *Act respecting Access to documents held by public bodies and the Protection of Personal Information*.

4. DEFINITIONS

For the purposes of this directive, the following terms shall mean:

“Act” means the *Act respecting access to documents held by public bodies and the protection of personal information*.

“CAI” means the Commission d'accès à l'information du Québec.

“Committee” means the SAQ's Access to documents and protection of personal information committee.

“DIA” refers to the SAQ's Business Intelligence and Customer Insights Department.

“Ethical Risk” means a Survey that may involve risks on maintaining trust, on the SAQ's values, on respect for privacy, on respect for individuals, on the balance between advantages and disadvantages, on transparency, and so on.

“Individual Concerned” means a natural person to whom Personal Information relates.

“Person in Charge of Access to Documents and Protection of Personal Information” means the person within the SAQ who is responsible for ensuring compliance with and implementation of the Act, in particular with respect to the protection of Personal Information.

“Personal Information” means any information relating to a natural person which enables that person to be identified directly—either by recourse to that information alone—or indirectly—either by combination with other information.

“Sensitive Personal Information” means any Personal Information which, by its nature, including medical, biometric or otherwise intimate, or by the manner in which it is used or disclosed, gives rise to a high degree of reasonable expectation of privacy.

“Survey” refers to an instrument of observation or systematic questioning based on sampling or questionnaires, such as opinion polls, customer satisfaction surveys, customer service quality surveys, market research surveys and focus groups.

5. SCOPE OF APPLICATION

This directive applies to all Surveys where Personal Information is collected or used. It applies to Surveys carried out by the SAQ or by a third party on its behalf, including those conducted:

- To find out about customer or potential customer satisfaction or preferences;
- Among company employees;
- With the SAQ's business partners.

6. STAKEHOLDER ROLES AND RESPONSIBILITIES

- 6.1. DIA is generally responsible for the administration of Surveys carried out by and on behalf of the SAQ. DIA is responsible for ensuring compliance with the rules set out in this directive when carrying out the Surveys it implements;

- 6.2. DIA reports periodically to the Committee on the Surveys it conducts;
- 6.3. The Committee must approve any Survey involving sensitive Personal Information before it is carried out;
- 6.4. The Committee must approve any Survey involving an Ethical Risk before it is carried out in order to determine whether said risk is justified. For the purposes of evaluating the ethical aspect of a Survey, the Committee takes the following factors into account:
- The nexus between the SAQ's values and mission and the Survey;
 - Maintaining public confidence in the SAQ;
 - Protecting privacy;
 - The possibility for each person surveyed to exercise his or her free choice as to whether or not to take part in the Survey, which presupposes the provision of clear information on the subject;
 - The sensitivity of the Personal Information collected and the purpose for which it is to be used;
 - Establishing the necessity of collecting Personal Information.
- 6.5. Any Survey that involves the collection of Personal Information and that is not conducted by DIA or by an outside firm mandated by DIA must be approved in advance by the Committee;
- 6.6. Any deviation from the guiding principles to be applied in a Survey must be approved in advance by the Committee;
- 6.7. The Committee may make recommendations on Surveys conducted by the SAQ;
- 6.8. The Person in Charge of Access to Documents and Protection of Personal Information ensures compliance with this directive, and receives and investigates all complaints concerning non-compliance with this directive. Complaints can be made by contacting the Person in Charge of Access to Documents and Protection of Personal Information at the following address:

Martine Comtois, Vice-President, Corporate Affairs and General Secretary
7500 Tellier Street
Montreal, Quebec H1N 3W5

E-mail: m.comtois@saq.qc.ca

Fax: 514 864-3642
Telephone: 514 254-6000, ext. 6645

7. VALUES AND GUIDING PRINCIPLES

The SAQ's mission is to commercialize alcoholic beverages. To this end, its values are passion, collaboration, accountability, and inclusion.

Accordingly, the following **guiding principles** should be applied to Surveys:

- Maintaining the Concerned Individuals' surveyed trust in the SAQ;
- Protecting the privacy of Concerned Individuals;

- The possibility for each person surveyed to exercise his or her free choice as to whether or not to participate in the Survey, which presupposes providing clear information about his or her rights in this respect and obtaining free and informed consent from participants;
- Ethical use of Personal Information collected and non-disclosure of such information to third parties other than those mandated to carry out the Survey;
- Restricting access to Personal Information collected to only those persons for whom access is necessary;
- The collection and secure storage of Personal Information throughout the process and life cycle of the data collected;
- Clear communication of the purpose of the Survey and the fact that it is being carried out on behalf of the SAQ;
- Avoid any maneuver designed to counter a solicited person's refusal to answer;
- Survey only if need is justified.

8. HOW TO CONDUCT A SURVEY

Anyone wishing to carry out a Survey must ensure that a research proposal is drawn up. This document must include the following elements:

- The context of realization;
- The objectives;
- Methodology: target population, sample, data collection method, questionnaire or interview schedule;
- The list of confidential information that will be collected, used or communicated for the Survey, if applicable, and the justification for the need to collect, use or communicate it;
- The periods during which confidential information will be kept;
- The schedule, including deadlines for approvals and required notices.

9. THIRD-PARTY SURVEY

When the SAQ communicates Personal Information to a service provider for the purposes of conducting a Survey, it must enter into a contract that contains the contractual requirements set out in section 67.2. of the Act.

10. GOVERNANCE OF THE DIRECTIVE

The Person in Charge of Access to Documents and Protection of Personal Information oversees the application of this directive. In addition, he or she advises and makes recommendations to any person concerning the directive.

11. OFFICIAL VERSION

The French version of this directive on surveys is the official and prevails over the English version.