

Privacy Policy

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Privacy Policy

1. What do we mean by “personal information”?

Personal Information refers to any information relating to a natural person that allows that person to be directly or indirectly identified. This includes, for example: name and postal or email address, social insurance number, identification card number, photograph, personal characteristics (e.g., food allergies), digital identifiers (e.g., password, IP address), as well as any other data associated with an identifiable individual. Such information may appear in various forms (written, graphic, audio, visual, or otherwise) and may be collected through different means or platforms, including through internal databases, software, applications, or other technological tools. This definition includes personal data, within the meaning of the EU GDPR and the United Kingdom GDPR. For the purposes of this Policy, any natural person whose Personal Information is processed by La Caisse is referred to as a “Concerned Individual” (collectively, the “Concerned Individuals”).

However, some Personal Information may be public. In Quebec, the Access Act lists a series of Personal Information that is public and which, in this case, loses its confidential nature.

2. Privacy Policy – Introduction

The purpose of this Privacy Policy (the “**Policy**”) is to inform you of La Caisse’s practices with respect to the confidentiality and protection of your Personal Information, including how we collect, use and disclose it.

This Policy applies to this Site and all our activities, unless we have provided you with a more specific policy and/or directive.

In this Policy, any terms that are not defined in the body of the text are defined in Appendix 1.

By submitting your Personal Information to us, registering for or using this Site, or voluntarily interacting with us, you consent to our collection, use and disclosure of your Personal Information in accordance with this Policy, as revised from time to time. Our Policy sets out our standards for the collection, use, disclosure and retention of your Personal Information. As such, La Caisse is committed to protecting your Personal Information.

This Policy was developed in accordance with our policies and directives issued pursuant to Applicable Legislation.

3. Your consent

We process your Personal Information with your consent or as permitted or required by law. The approach we use to obtain your consent depends on the circumstances and sensitivity of the Information collected. Therefore, subject to Applicable Legislation, your consent may be explicit or implicit. If you choose to provide us with Personal Information, we will presume that you consent to the Processing of your Personal Information as set out in this Policy.

In general, we will ask for your consent at the time your Personal Information is collected.

Once you have provided us with proof of identification, you may withdraw your consent to the Processing of your Personal Information at any time by contacting us as indicated in section 11.

If you provide us with Personal Information about another individual, it is your responsibility to obtain that individual's consent to allow us to process their Personal Information as set out in this Policy.

4. What types of Personal Information do we collect?

Collected information

The Concerned individuals concerned are informed of the Processing of their Personal Information through a [Privacy Notice](#).

Use of cookies

Our Site uses cookies. Cookies are files that are installed on your computer's hard drive or browser to collect Information, such as your language preference, browsing history, and browser type and version. Their purpose is to optimize your experience on our Site. You can set your browser to refuse all cookies or to notify you when a cookie is sent. Instructions on how to do so are provided by each browser site.

For further information, please see our [Cookies Notice](#).

Analytical tools and other third-party technologies

We use analytical tools and other third-party technologies, such as Google Analytics.

For further information, please see our [Cookies Notice](#).

5. For what purpose and on what legal grounds do we use your Personal Information?

We may use your Personal Information and other Information for the purposes set out below:

- To respond to your questions and inquiries
- For our legitimate interest in detecting and preventing fraud
- To comply with our legal obligations (e.g. in the event of a complaint or an injunction)
- For purposes permitted or required by Applicable Legislation

- Any other purpose, with your consent

We do not use collected Information to advertise third-party products and services, or to engage in targeted La Caisse's advertising on third-party websites or service offerings.

More specifically, the Personal Information we collect is for the purposes set out in the [Privacy Notice](#).

6. How do we share your Personal Information?

We may share your Personal Information with our service providers. In such instances, we take steps to ensure that the rules set out in this Policy are followed, and we require service providers to maintain the confidentiality and security of your Personal Information.

We also require them to only use your Personal Information in accordance with its intended purpose. When our service providers no longer need your Personal Information for such limited purposes, we require them to destroy it.

Under certain circumstances, we may authorize our service providers to retain Information for legally permitted purposes or in aggregated, anonymous or statistical form that does not identify you.

We do not allow service providers to disclose your Personal Information to unauthorized parties or use it for direct marketing purposes.

For more information about our service providers, please contact us as indicated in section 11.

Listed below are categories of third parties that may process your Personal Information:

- Other members of La Caisse and our designated representatives Members of La Caisse who may use such Information for statistical analysis and producing reports
- Service providers who help manage our computer or back-office systems, or who provide platforms and portals for administration
- Our Québec regulators and other enforcement agencies under Canadian, U.S., European and international law
- Fraud prevention agencies and organizations
- Our advisors (who may be legal representatives to you, us, or a third-party requester) and other professional services firms (including our auditors)
- Marketing execution, webinar and customer satisfaction service providers acting on our behalf who facilitate online events, provide marketing communications, and gather feedback on our service levels from our clients
- For information only, a list of contractors is available on request.

We may also use and disclose your Personal Information when we believe such use or disclosure is authorized, necessary or appropriate, such as:

- Under Applicable Legislation, including laws across borders, to comply with any legal procedure or to respond to requests from public and government authorities, including public and government authorities across borders
- To protect our activities and those of members of La Caisse

- To protect our rights, security or property and/or those of La Caisse members, our employees and yourself
- To enable us to pursue available recourses and limit the damage we may incur
- In the event of a restructuring, merger, sale, joint venture, assignment, transfer or other disposal of all or part of our operations, brands, affiliates, subsidiaries or other assets

7. How do we retain your Personal Information?

Your Personal Information is currently hosted in Canada and the United States. For legitimate legal or commercial purposes, we may need to transfer or authorize access to Personal Information to parties located outside your province, territory or country of residence.

Moreover, where applicable, it may be hosted and processed in any country in which La Caisse has facilities or where we contract with service providers. In the latter case, your Personal Information may be transferred to foreign countries, which may have laws that differ from those of your country. Such transfer of Personal Information intended for Processing may only take place in accordance with Applicable Legislation. For example, under certain privacy laws, cross-border transfers may be permitted if the Personal Information is sent to specific countries that are deemed as having sufficient legal protections for an Individual's Personal Information and privacy rights (e.g., to countries that are the subject of an adequacy decision from the EU Commission or the United Kingdom Secretary of State). For cross-border transfers to recipients outside these jurisdictions, we must ensure appropriate safeguards are in place before transferring the data. Appropriate safeguards may include entry into standard contractual clauses, or, where applicable, the transmission of notices regarding the Processing of Personal Information to the receiving party. There are some derogations to these requirements that may be applied in limited circumstances. A Transfer Impact Assessment may also be required under Applicable Legislation under which we must consider the risks associated with transferring the data to a different country.

Access Act – La Caisse will conduct a Privacy Impact Assessment ("PIA") in relation to any project to acquire, develop or redesign an information system or an electronic service delivery system involving the Processing of Personal Information.

EU and United Kingdom GDPR – La Caisse will carry out a data protection impact assessment, when the Processing is likely to result in a high risk to the rights and freedoms of the Concerned Individuals.

When such information is located across borders, it is subject to the laws of that country and may be disclosed to the governments, courts or law enforcement or regulatory agencies of that other country in accordance with its laws. Nonetheless, our practices with respect to your Personal Information will at all times be governed by this Policy.

8. How do we protect your Personal Information?

We have implemented physical, organizational, contractual and technological security measures that are in line with ISO standard 27001 to protect your Personal Information and other Information from loss, theft, unauthorized access, disclosure, duplication, use or modification.

We have taken measures to ensure that the only employees authorized to access your Personal Information are those who have a "need to know" or whose duties reasonably require access to such information.

Despite the measures described above, no method for transmitting or hosting Information is 100% secure or error-free. We therefore cannot guarantee absolute security.

Management of Privacy Incidents

In the event of a Privacy Incident, the Privacy Officer will conduct an in-depth investigation and take reasonable measures to mitigate risk and minimize any potential or future damage.

Where required by Applicable Legislation in the event of a Privacy Incident, the Privacy Officer will notify the competent authority within the applicable time limits and inform the Concerned Individuals by the Privacy Incident.

If you have reason to believe that your interaction with us is no longer secure (e.g. you believe that the Information you have provided to us has been compromised), please contact us immediately as indicated in section 11

Employee roles and responsibilities

It is the responsibility of all La Caisse employees to familiarize themselves with the frameworks governing the protection of Personal Information and to process Personal Information in compliance with them, to ensure the integrity and confidentiality of information and prevent any breach of the rules regarding the protection of Personal Information.

La Caisse carries out awareness-raising and training activities for all employees to remind them of the rules and principles applicable to the protection of Personal Information.

Our retention periods

Personal Information must be retained in accordance with the *Classification Plan*¹ and the *Retention Schedule*² for no longer than is necessary for the purposes for which it is processed. In accordance with Applicable Legislation, we keep personal information we receive for as long as is necessary to: (i) fulfil the purpose(s) for which we collected the personal information; (ii) provide and secure our employee benefits and services; (iii) resolve disputes, establish legal defenses, enforce our agreements and comply with Applicable Legislation; (iv) conduct audits; and (v) comply with our internal policy requirements.

For further information regarding the retention period of your Personal Information, please contact us as indicated in section 11.

9. Your rights

You have various rights with respect to your Personal Information. These rights may vary depending on your geographic location and the Applicable Legislation governing the Processing of your Personal Information. This section provides you with an overview of these rights and how they may be exercised. We will take the necessary steps to ensure that your Personal Information is accurate, complete and up to date. We will not systematically update your Personal Information unless such a process is necessary.

¹ The Classification Plan can be viewed [here](#).

² The Retention Schedule can be viewed [here](#).

Access	You may have the right to receive confirmation regarding the Processing of Personal Information retained by La Caisse and to access it (i.e. to examine it and get a copy) without delay.
Rectification	You may exercise your right to have any Personal Information held by La Caisse that is inaccurate or incomplete rectified without delay, and, in any event, within thirty (30) days of La Caisse's receipt of the request to do so.
Withdrawal of consent	You may exercise your right to withdraw consent to the Processing of Personal Information at any time when that Processing is based on consent. La Caisse must comply with the request; however, the withdrawal of consent does not affect the lawfulness of any Processing of data that took place before the consent was withdrawn, or where consent is not required under Applicable Legislation or any lawful basis.
Erase	You may exercise your right to have La Caisse delete Personal Information, without delay, under applicable law, particularly if the Personal Information is no longer necessary for the purposes for which it was collected or otherwise processed. La Caisse does not always have to agree to this, for example if there are legal or other reasons why La Caisse needs to keep or use the information. If this is the case, La Caisse would explain the reasons to the Concerned Individuals.
Portability	Unless this raises serious practical difficulties, you may be entitled to receive Personal Information provided to La Caisse in a structured and commonly used format.
Objection	<p>You may exercise your right to object to the Processing of Personal Information.</p> <p>La Caisse will comply with the request, unless it is able to demonstrate the existence of compelling legitimate grounds justifying the continuation of the Processing, which override the interests, rights and freedoms of the Concerned Individual or if the Processing is necessary for the establishment, exercise or defence of its rights in court.</p>
Restriction	You may exercise your right to restrict the Processing of Personal Information under certain circumstances, including where the information is inaccurate, has been used unlawfully, is no longer relevant to La Caisse or if you have requests the cessation of its use and are awaiting confirmation from La Caisse as to whether or not to continue such Processing. During the limitation period, La Caisse refrains from sharing or using your Personal Information.
Right in the event of the use of an automated decision system	In some cases, you may request information about how any automated decision system is used and the impact it may have on the Individual.

How to submit an application

To exercise your rights, you must submit a written request to the Privacy Officer. Please note that for identification purposes, you may be asked to provide a copy of an appropriate piece of identification following a request to exercise a right.

The Concerned Individual making the request is encouraged to fill out the request form according to the template developed by La Caisse. La Caisse will respond as soon as possible, but within a maximum of thirty (30) days from receipt of all relevant information. La Caisse will retain documents associated with requests (and related decisions) in accordance with the *Retention Schedule*.

For more information about your rights and how to exercise them, please contact the Privacy Officer at protectionRP@lacaisses.com.

Complaints

If you have a reason to believe that there has been a violation of Applicable Legislation or this Policy, or who wish to complain about La Caisse's practices regarding the processing of Personal Information, you may submit a written complaint to protectionRP@lacaisses.com

You may also contact the competent data protection authority.

10. Third-party websites and services

This Policy does not apply to websites, products or services provided by third parties. We are not liable for such third parties' privacy practices and encourage you to review their privacy policies before using their websites, products or services.

11. Contact us

Should you have any questions about our Conditions of Use and our Policy or regarding La Caisse's privacy practices in respect of this Site or to exercise your rights, please contact La Caisse's designated Privacy Officer:

Claude Mikhail
Senior Director, Ethics and compliance
Tel.: +1-514-847-8005

Two Assistant DPOs have also been appointed to assist the Privacy Officer in his mandate to ensure compliance with applicable laws in connection with La Caisse's activities in Europe and Asia-Pacific:

Chiraz Kmar Turki
Director, Legal Affairs
CDPQ Paris
Tel.: + 33 (7) 897250423

Sewok Yang

Senior Director, Legal Affairs, Asia Pacific

CDPQ Singapore

Tel.: +65 9739 6792

The Assistant DPOs report annually to the Privacy Officer on all the requests they processed regarding the protection of Personal Information. In the event of a Privacy Incident, the Privacy Officer should be immediately notified by the relevant DPO.

Any requests concerning the protection of Personal Information must be sent by email to:
protectionRP@lacaisses.com.

12. Updates

La Caisse's Personal Information Access and Privacy Committee reserves the right to amend this document at any time and make the new version available on the Site. Such changes, amendments, additions or repeals are effective upon issuance of a notice of modification which may be communicated by posting on the Site or by any other means of transmission.

Your continued use of the Site after such notice will constitute: (a) an acknowledgement of the new terms of the Policy and (b) an agreement to be bound by and comply with them.

Appendix: Definitions

For the purpose of this Policy:

"Documents" refers to any medium of Information, whether paper, electronic, magnetic, optical, wireless or otherwise. Information is delimited and structured, in a tangible or logical way depending on the medium that carries it, and it is intelligible in the form of words, sounds or images.

"Information" refers to the data, indications, sets of information, including Personal Information, recorded by La Caisse on a Document or held by La Caisse, including Information from a third party.

"La Caisse" refers to Caisse de dépôt et placement du Québec, its management subsidiaries, and its international offices.

"Laws respecting the protection of Personal Information" or **"Applicable Legislation"** refer to any laws, regulations, recommendations or notices applicable to matters relating to the protection of Personal Information including, to the extent applicable, the *Personal Information Protection and Electronic Documents Act* (the **"PIPEDA"**), the *Act respecting Access to documents held by public bodies and the Protection of personal information* (the **"Act respecting Access and the Protection of personal information"**), the *Archives Act*, the European Union's *General Data Protection Regulation (EU) 2016/679* (the **"EU GDPR"**), the *EU GDPR* as it forms part of law of the United Kingdom by virtue of section 3 of the *European Union (Withdrawal) Act 2018* and as modified by the *Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019* and the *United Kingdom's Data Protection Act 2018* (collectively, the **"United Kingdom GDPR"**) (the EU GDPR and the United Kingdom GDPR are collectively referred to as the **"GDPR"**), and any other laws, regulations, recommendations or notices that supersede, supplement, amend, extend, re-enact or codify the Applicable Legislation respecting the protection of personal information.

"Notice of Information Respecting the Protection of Personal Information": La Caisse publishes or provides an information notice on the collection of Personal Information that describes, in simple and clear terms, how it processes Personal Information. This notice includes a description of Personal Information collected, the purposes for which it is processed, the categories of third parties to whom La Caisse discloses Personal Information and, if applicable, whether Personal Information can be transferred outside Québec.

"Privacy Impact Assessment" refers to any process to identify the impact of the Proposed Processing on the protection of Personal Information, which includes an assessment of the sensitivity of the Personal Information, the security and confidentiality associated with the Processing and a means of developing risk mitigation measures.

"Privacy Incident" refers to the unauthorized access to Personal Information, unauthorized use of Personal Information, unauthorized disclosure of Personal Information, loss of Personal Information or any other breach of the protection of such information.

"Processing" or any conjugation of the verb "process" refers to any operation or set of operations carried out with or without the use of automated processes and applied to data or sets of Personal Information (collection, use, recording, retention, modification, consultation, communication, dissemination, reconciliation, erasure, destruction, etc.).

"Retention Schedule" refers to the schedule that establishes, among other things, the lifespan of a Document, from its creation to the time it is to be destroyed or transferred to Bibliothèque et Archives nationales du Québec ("BAnQ") for permanent preservation.

“**Site**” refers to La Caisse website ([La Caisse | Global Investment Group](#)) and Espace CDPQ website (<https://espacecdpq.com/en>).