

Van Grimde Corps Secrets Data Governance Policy

1. Purpose and Objectives of the Data Governance Policy

What led us to create this policy?

We created this policy to formalize and structure our approach to data management for both our internal activities and our interactions with the public through our various digital platforms.

What need does the policy address?

This policy addresses the need to protect the personal and professional information we collect, ensure compliance with current regulations, and guarantee transparency and trust with our users and partners.

Why do we want to establish data governance?

- To formalize internal processes.
- For legal compliance (notably the Personal Information Protection Act).
- To ensure transparency with users and partners regarding data collection and use.
- To promote equity, diversity, and inclusion (EDI).

2. Statement of Principles

The guiding principles of our approach include :

- **Confidentiality:** Respect for privacy and protection of personal information.
- **Security:** Implementation of robust measures to protect data.
- **Transparency:** Clear and open communication on data management.
- **Ethics:** Responsible and ethical use of collected data.

3. Scope and Limits of the Data Governance Policy

To whom does the policy apply?

This policy applies to Van Grimde Corps Secrets, its employees, collaborators, and users of its web platforms.

What data does the policy cover?

The policy applies to usage data, content published on our platforms, and personal information collected by our organization.

Who or what is the policy not applicable to?

It does not apply to the internal management of data by our partners.

Language of the policy:

This policy is written in French. In the event of a discrepancy between the French version and any translated version, the French version prevails.

Other applicable policies and laws:

This policy complements our other internal policies and complies with applicable laws such as the Personal Information Protection Act.

4. Glossary of Definitions

- **Descriptive Data:** Information describing user characteristics and interactions.
- **Usage Data:** Information on how users interact with our platforms.
- **Personal Information:** Information that directly or indirectly identifies a person.

5. Definition of Roles and Responsibilities of Stakeholders

Roles and Responsibilities:

- **Access to data:** Limited to authorized employees.
- **Data quality validation:** Performed by the data governance officer.
- **Data Officer:** Isabelle Van Grimde, General and Artistic Director, who can be contacted at isabelle@vangrimdecorssecrets.com.

6. Data Ownership, Licenses, and Copyrights

Data Ownership:

The data collected and the data products (analysis, aggregation) belong to Van Grimde Corps Secrets.

7. Data Management

Data Collection:

- **Why and how?:** For audience analysis, understanding, and strategy optimization. Data is collected via Google Analytics, Mailchimp, and contractual forms.
- **Sensitivity and risks:** High sensitivity for personal data. Risks related to confidentiality and security.
- **Depersonalization:** Data is anonymized whenever possible.
- **Data storage:** In Dropbox Business, Google Contacts, and hard drive archives.
- **Retention period:** Varies depending on the type of data in compliance with legal requirements.
- **Data sharing:** Limited to authorized partners and shared in anonymized or aggregated form.
- **Consent and information:** Users are informed and give their consent via collection forms and policies displayed on our platforms.
- **Data accuracy:** We are committed to keeping the data we collect as accurate and up-to-date as possible.

8. Procedures for Non-Compliance

Non-compliance with the policy:

In the event of non-compliance, disciplinary measures will be taken, and corrective procedures will be implemented to prevent repeat offenses.

9. Policy Review

Responsibility and frequency of review:

The policy is regularly reviewed by Isabelle Van Grimde or in the event of significant changes in data collection and management practices. Anyone within the organization can request a policy update.

Date of the last policy update: September 13, 2024.

Complaint procedure:

Users can file a complaint regarding non-compliance with this policy by contacting the data officer at isabelle@vangrimdecorssecrets.com.