



**GROUPE NUTRI**

**PROCEDURE FOR HANDLING COMPLAINTS ABOUT  
PROTECTION OF PERSONAL INFORMATION**

**JANUARY 2024**

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*The use of the masculine gender includes the feminine, and the singular includes the plural and vice versa.  
This presentation is intended to make the text easier to read.*

## I. BACKGROUND

Groupe Nutri Inc. and its business units, hereinafter referred to as **Groupe Nutri**, is a company subject to the *Act respecting the protection of personal information in the private sector* (RLRQ, c. P-39.1).

Individuals who consider that Groupe Nutri's management of their personal information does not comply with applicable legislation may file a complaint with the Privacy Officer.

## II. OBJECTIVES

This procedure describes how to file a complaint about Groupe Nutri's privacy practices.

It also specifies how such complaints are handled and defines the roles and responsibilities of Groupe Nutri members and staff in this regard. Where appropriate, it provides for measures to improve its management of personal information in light of situations brought to its attention.

## III. SCOPE OF APPLICATION

This procedure applies to personal information held by Groupe Nutri and to any person who processes such information on its behalf. Members of Groupe Nutri's Board of Directors and staff, including students, interns and contract workers, are required to comply with this procedure.

## IV. DEFINITIONS

For the purposes of this procedure :

- *"Complainant"*: an individual who files a complaint in accordance with the Privacy Complaint Procedure.
- *"Complaint"* means an individual's written dissatisfaction with a Groupe Nutri practice relating to the protection of personal information.
- *"Personal information"* means information concerning a natural person and enabling that person to be identified directly or indirectly.

## V. COMPLAINTS HANDLING PROCEDURE

### *i. Confidential treatment of complaints*

In handling complaints, Groupe Nutri is committed to respecting the confidentiality and protecting the personal information it holds throughout its life cycle, from collection to destruction.

All complaints are treated confidentially. Only the information necessary to process the complaint will be shared with Groupe Nutri employees who must become aware of it in the course of their duties.

### *ii. Receipt of complaint*

Any complaint concerning the management of personal information by Groupe Nutri must be made in writing, addressed to the person responsible for the protection of personal information, Mr. Sébastien Mercier, and sent by e-mail or by mail, to the following coordinates:

6655, rue Picard, Saint-Hyacinthe, QC, J2S 1H3  
[smercier@nutrigroupe.ca](mailto:smercier@nutrigroupe.ca)

Any Groupe Nutri employee receiving a complaint must forward it, upon receipt, to the Privacy Officer. The latter must acknowledge receipt of the complaint within five (5) business days of its receipt.

### *iii. Admissibility of a complaint*

A complaint is admissible if :

- It is submitted by an individual;
- It concerns dissatisfaction with a practice, an action or inaction by Groupe Nutri with respect to the management or protection of the personal information it holds about you;
- It contains the following items:
  - Name, first name and contact details of complainant;
  - A sufficiently precise description of the problematic situation;
  - Corrective action(s) required.

A complaint is not admissible if it :

- Is anonymous;
- Is abusive, frivolous or manifestly made in bad faith;
- Contains comments of a hateful or defamatory nature;
- Does not contain the information and details required for processing;
- Concerns dissatisfaction with a subject other than the protection of personal information.

In addition, this procedure does not apply to any informal procedure aimed at correcting a specific problem, insofar as the problem is dealt with as part of Groupe Nutri's regular activities and without a written complaint having been filed by an individual.

A complaint made under this procedure does not entitle the complainant to compensation.

The Privacy Officer informs the complainant, in writing, when his or her complaint is inadmissible. The letter specifies why the complaint is inadmissible.

If the complaint is admissible, the Privacy Officer proceeds to process it. After analyzing the complaint and gathering all the relevant facts, he or she determines whether or not it is well founded and, if so, whether corrective measures or interventions are required.

#### *iv. Determining the merits of a complaint*

A complaint is justified when the person responsible for the protection of personal information concludes that an error has been made or a breach has occurred in relation to the laws, regulations or policies governing the management and protection of personal information by Groupe Nutri.

The person in charge may then recommend measures to Groupe Nutri to correct the situation or prevent a recurrence.

Each year, it analyzes the privacy complaints received during the year and submits a report to the Board of Directors, which may include recommendations for improving Groupe Nutri's privacy management practices.

v. *Complaint processing time*

The complaint must be processed within 30 days of receipt of all the information required to process it. If the complaint cannot be processed within this timeframe, the Privacy Officer will inform the complainant of the reasons for the delay and the timeframe within which the findings will be communicated to the complainant.

Once the complaint has been processed, the person in charge sends a written report of his or her findings to the complainant. It states :

- Whether or not the complaint is well founded;
- If it is well founded, it indicates what corrective measures are recommended or what action has been taken, if any.

vi. *Complaints register*

The Privacy Officer shall record all complaints relating to the protection of personal information in the Complaints Register (Appendix 1). The register must contain the following information:

- Complaint number;
- Name, first name and contact details of complainant;
- Date complaint received by manager;
- Conclusion as to whether or not it is admissible;
- Description of complaint and personal information concerned;
- Steps taken;
- Date of reply to the complainant;
- Conclusion as to whether or not the complaint is well founded;
- Recommendations or other corrective measures taken, if any;
- Comments.

## VI. ROLES AND RESPONSIBILITIES

### *i. Board of Directors :*

- Follows up on reports produced by the Privacy Officer;
- Handles any dissatisfaction or complaint involving the Privacy Officer and informs the complainant of the outcome of the handling of the dissatisfaction.

### *ii. Access and Privacy Officer :*

- Have this policy adopted by the Executive Committee;
- Receives complaints and determines their admissibility in accordance with the present procedure;
- Contact the complainant as soon as possible and inform him or her of how the complaint will be handled and what steps will be taken;
- Informs the complainant of its findings and any steps it has taken;
- Makes recommendations and suggestions for improvement, and reports any breaches or other situations that present privacy risks;
- Records all complaints relating to the protection of personal information in the complaints register;
- Annually analyzes privacy complaints received during the year and submits a report to the Board of Directors on the protection of personal information. May make recommendations to improve the management of personal information held by Groupe Nutri.

### *iii. Groupe Nutri staff :*

- Ensures compliance with this procedure and that complaints received are forwarded to the Privacy Officer;
- Collaborate with the Privacy Officer in handling complaints, as required.

## VII. POLICY ADMINISTRATION

Responsible body :	Board of Directors
Responsible for policy application :	Vice President, Human Resources
Approval date :	January 2024
Revision date :	n/a
Effective date of policy :	January 2024
Frequency of policy updates :	This policy is revised at the request of the Vice President, Human Resources or as needed.



## APPENDIX 1

### Procedure for handling complaints about the protection of personal information Privacy complaints register

File number	Last name, first name and contact details of complainant	Date complaint received by manager	Conclusion as to admissibility or not	Description of complaint and personal information concerned	Steps taken	Date of reply to complainant	Conclusion as to whether or not the complaint is well founded	Notes and recommendations or other corrective measures taken