

Policy on the Processing of Personal Information

Last revised: 21 August 2026

1. General Provisions

This policy on the processing of personal information has been drawn up in accordance with the requirements of the **Act respecting the protection of personal information in the private sector** (CQLR c. P-39.1, as amended by the Act to modernize legislative provisions as regards the protection of personal information, S.Q. 2021, c. 25, commonly known as "Law 25") (hereinafter — the Private Sector Act) and, where applicable, the federal **Personal Information Protection and Electronic Documents Act** (S.C. 2000, c. 5) (hereinafter — PIPEDA), and determines the procedure for the processing of personal information and the measures to ensure the security of personal information taken by **Ihor Urmach**, a natural person operating a sole proprietorship (*entreprise individuelle*), Québec Enterprise Number (NEQ): **2282463340**, registered address 2M-520 rue Landreville, Montréal (Québec) H3E 1B4, Canada (hereinafter — the Enterprise).

1.1. The Enterprise sets as its most important objective and as a condition of carrying on its activity the observance of the rights and freedoms of the person in the processing of their personal information, including the protection of the rights to privacy and to respect for private life guaranteed by section 5 of the Charter of human rights and freedoms (CQLR c. C-12) and by articles 3 and 35 to 41 of the Civil Code of Québec.

1.2. This policy of the Enterprise on the processing of personal information (hereinafter — the Policy) applies to all information that the Enterprise may obtain about visitors to the website <https://metrocraft36.com>.

1.3. Person in charge of the protection of personal information

In accordance with section 3.1 of the Private Sector Act, the person exercising the highest authority within the Enterprise is by law the person in charge of the protection of personal information (the Privacy Officer). That function is exercised by:

Ihor Urmach, Privacy Officer
2M-520 rue Landreville, Montréal (Québec) H3E 1B4, Canada
E-mail: legal@igsteam.org

Any request concerning access, rectification, withdrawal of consent, portability, de-indexing or any other matter covered by this Policy may be addressed to the Privacy Officer at the contact details above.

2. Basic Concepts Used in the Policy

2.1. **Automated processing of personal information** — the processing of personal information by means of computing equipment.

2.2. **Restriction of processing** — the temporary cessation of the processing of personal information (except where processing is necessary in order to update the personal information), including the cessation of dissemination and the de-indexing provided for by section 28.1 of the Private Sector Act.

2.3. **Website** — the collection of graphic and information materials, as well as computer programs and databases ensuring their availability on the Internet at the network address <https://metrocraft36.com>.

2.4. **Personal information system** — the collection of personal information contained in databases together with the information technologies and technical means ensuring its processing.

2.5. **Anonymisation of personal information** — acts as a result of which it is no longer possible, without the use of additional information, to determine that personal information belongs to a specific User or other data subject. Information concerning a natural person is **anonymised** where it is, at all times, reasonably foreseeable in the circumstances that it irreversibly no longer allows the person to be identified directly or indirectly, in accordance with section 23 of the Private Sector Act.

2.6. **Processing of personal information** — any act (operation) or set of acts (operations) performed with or without the use of means of automation with personal information, including collection, recording, systematisation, accumulation, storage, updating (revision, modification), extraction, use, communication (dissemination, provision, access),

anonymisation, restriction, deletion and destruction of personal information.

2.7. Enterprise — any person carrying on an organised economic activity within the meaning of article 1525 of the Civil Code of Québec who collects, holds, uses or communicates personal information, independently or jointly with other persons, and who determines the purposes of the processing of personal information, the composition of the personal information subject to processing, and the acts (operations) performed with the personal information. The term corresponds to the notion of "person carrying on an enterprise" in the Private Sector Act and to that of "organization" in PIPEDA.

2.8. Personal information — any information which relates to a natural person and allows that person to be identified, directly or indirectly, including any information relating directly or indirectly to a determined or determinable User of the website <https://metrocraft36.com>.

2.9. Sensitive personal information — personal information which, due to its nature, in particular its medical, biometric or otherwise intimate nature, or due to the context of its use or communication, entails a high level of reasonable expectation of privacy (section 59 of the Private Sector Act). The Enterprise does not knowingly collect sensitive personal information.

2.10. User — any visitor to the website <https://metrocraft36.com>.

2.11. Communication of personal information — acts directed at disclosing personal information to a specific person or to a specific group of persons.

2.12. Dissemination of personal information — any acts directed at disclosing personal information to an indeterminate group of persons (transfer of personal information) or at making personal information known to an unlimited group of persons, including publication of personal information in the media, posting on information and telecommunications networks, or providing access to personal information by any other means.

2.13. Communication of personal information outside Québec — the communication of personal information to a person or body situated outside the Province of Québec, or the entrusting to such a person or body of the task of collecting, using, communicating or keeping such information, within the meaning of section 17 of the Private Sector Act.

2.14. Destruction of personal information — any acts as a result of which personal information is destroyed irretrievably, with the impossibility of further restoration of the content of the personal information in the personal information system, and/or the material carriers of the personal information are destroyed.

2.15. Confidentiality incident — access to, use or communication of personal information that is not authorised by law, the loss of personal information or any other breach of the protection of such information, within the meaning of section 3.6 of the Private Sector Act.

3. Basic Rights and Obligations of the Enterprise

3.1. The Enterprise has the right:

- to receive from the data subject accurate information and/or documents containing personal information;
- where the data subject withdraws consent to the processing of personal information, or sends a request for the cessation of the processing of personal information, to continue processing the personal information without the consent of the data subject where the grounds set out in the Private Sector Act — in particular sections 12, 18 and 18.1 to 18.4 — are present;
- to determine independently the composition and list of measures necessary and sufficient to ensure the performance of the obligations provided for by the Private Sector Act and the regulations adopted in accordance with it, unless otherwise provided by that Act or by other applicable legislation.

3.2. The Enterprise is obliged:

- to provide to the data subject, at their request, information concerning the processing of their personal information, within the period of 30 days provided for by section 32 of the Private Sector Act;
- to organise the processing of personal information in the manner established by applicable law;
- to reply to the requests and enquiries of data subjects and their legal representatives in accordance with the requirements of the Private Sector Act;

- to report to the Commission d'accès à l'information du Québec, at that body's request, the necessary information within the period stated in the request;
- to publish or otherwise ensure unrestricted access to this Policy on the processing of personal information, in accordance with section 8.2 of the Private Sector Act;
- to take legal, organisational and technical measures for the protection of personal information against unlawful or accidental access to it, destruction, modification, restriction, copying, communication or dissemination of personal information, and against other unlawful acts in respect of personal information, in accordance with section 10 of the Private Sector Act;
- to keep a register of confidentiality incidents, and, where a confidentiality incident presents a risk of serious injury, to notify the Commission d'accès à l'information du Québec and the persons concerned with diligence, in accordance with sections 3.5 to 3.8 of the Private Sector Act;
- to conduct a privacy impact assessment for any project of acquisition, development or overhaul of an information system or electronic service delivery system involving personal information, and for any communication of personal information outside Québec, in accordance with sections 3.3 and 17 of the Private Sector Act;
- to cease the communication (dissemination, provision, access) of personal information, to cease processing and to destroy or anonymise personal information in the manner and in the cases provided for by the Private Sector Act;
- to perform the other obligations provided for by the Private Sector Act and by PIPEDA where applicable.

4. Basic Rights and Obligations of Data Subjects

4.1. Data subjects have the right:

- **to be informed** of the collection of their personal information, of the purposes of that collection, of the means by which it is collected, of the rights of access and rectification, and of their right to withdraw consent, in accordance with section 8 of the Private Sector Act;
- **of access** — to receive information concerning the processing of their personal information and to be given communication of that information, except in the cases provided for by law. The information is provided to the data subject by the Enterprise in an accessible form and must not contain personal information relating to other data subjects, except where there are lawful grounds for disclosing such personal information;
- **of rectification** — to require the Enterprise to correct their personal information, to restrict its processing or to have it destroyed, where the personal information is incomplete, out of date, inaccurate, unlawfully obtained, or not necessary for the stated purpose of processing, and also to take the measures provided by law for the protection of their rights (articles 35 to 40 of the Civil Code of Québec; sections 27 to 41 of the Private Sector Act);
- **of portability** — to obtain the computerised personal information they have provided in a structured, commonly used technological format, and to require that such information be communicated to any person or body authorised by law to collect it, in accordance with section 27, paragraph 3, of the Private Sector Act;
- **of de-indexing and cessation of dissemination** — to require that the dissemination of their personal information cease or that any hyperlink attached to their name giving access to that information by a technological means be de-indexed, where the conditions set out in section 28.1 of the Private Sector Act are met;
- **to withdraw consent** — to withdraw consent to the processing of personal information at any time, and to send a request for the cessation of the processing of personal information;
- **in respect of automated decisions** — where a decision is based exclusively on automated processing of personal information, to be informed of that fact, of the personal information used, of the reasons and principal factors leading to the decision, and of the right to have that information corrected, and to submit observations to a member of the personnel of the Enterprise in a position to review the decision (section 12.1 of the Private Sector Act);
- **to a technological product with the highest level of confidentiality by default** — where the Enterprise offers a technological product or service having privacy settings, those settings ensure the highest level of confidentiality by default, without any intervention by the person concerned (section 9.1 of the Private Sector Act);
- **to complain** — to lodge a complaint with the Commission d'accès à l'information du Québec, or with the Office of the Privacy Commissioner of Canada where PIPEDA applies, or to bring proceedings before the courts, in respect of unlawful acts or omissions of the Enterprise in the processing of their personal information;
- to exercise the other rights provided for by applicable law.

4.2. Data subjects are obliged:

- to provide the Enterprise with accurate data about themselves;
- to inform the Enterprise of any update (revision, modification) of their personal information.

4.3. Persons who have provided the Enterprise with inaccurate information about themselves, or information about another data subject without the latter's consent, bear liability in accordance with applicable law.

5. Principles of the Processing of Personal Information

5.1. The processing of personal information is carried out on a lawful and fair basis and with the consent of the person concerned, which must be manifest, free and enlightened and given for specific purposes, in accordance with section 14 of the Private Sector Act.

5.2. The processing of personal information is limited to the achievement of specific, predetermined and lawful purposes, which are determined before the personal information is collected (section 4 of the Private Sector Act). Processing of personal information incompatible with the purposes of its collection is not permitted.

5.3. The combination of databases containing personal information the processing of which is carried out for purposes incompatible with one another is not permitted.

5.4. Only personal information that is necessary for the purposes of its processing is subject to processing. The Enterprise collects only the personal information that is necessary for the purposes determined before collection, in accordance with section 5 of the Private Sector Act.

5.5. The content and volume of the personal information processed correspond to the stated purposes of processing. Excessiveness of the personal information processed in relation to the stated purposes of its processing is not permitted.

5.6. In the processing of personal information, the accuracy of the personal information, its sufficiency and, where necessary, its currency in relation to the purposes of the processing of the personal information are ensured. The Enterprise takes the necessary measures and/or ensures that they are taken in order to delete or update incomplete or inaccurate data.

5.7. Personal information is stored in a form permitting the data subject to be identified for no longer than is required by the purposes of the processing of the personal information, unless a period of retention is established by law or by a contract to which the data subject is a party, beneficiary or surety. Personal information processed is destroyed or anonymised upon achievement of the purposes of the processing, or where the necessity of achieving those purposes is lost, unless otherwise provided by law, in accordance with section 23 of the Private Sector Act.

5.8. Where the Enterprise uses technology allowing a person to be identified, located or profiled, the Enterprise informs the person concerned in advance of the use of that technology and of the means available to deactivate it, in accordance with section 8.1 of the Private Sector Act.

6. Purposes of the Processing of Personal Information

Purpose of processing	Informing the User by means of the sending of electronic messages
Personal information	Electronic address
Legal basis	The manifest, free and enlightened consent of the person concerned given for that specific purpose (section 14 of the Private Sector Act); the Act to establish a legal framework for information technology (CQLR c. C-1.1); Canada's Anti-Spam Legislation (S.C. 2010, c. 23) as regards the sending of commercial electronic messages
Types of processing of personal information	Collection, recording, systematisation, accumulation, storage, destruction and anonymisation of personal information. Sending of informational messages to the electronic mail address

Every commercial electronic message sent by the Enterprise identifies the Enterprise, states its contact details and contains an unsubscribe mechanism that remains functional for at least 60 days, as required by Canada's Anti-Spam Legislation.

7. Conditions for the Processing of Personal Information

7.1. The processing of personal information is carried out with the consent of the data subject to the processing of their personal information. Consent is requested for each purpose, in clear and simple language, and separately from any other information provided to the person concerned. Where the personal information is sensitive, consent is expressly given (section 14 of the Private Sector Act).

7.2. The processing of personal information is necessary in order to achieve purposes provided for by an Act of the Parliament of Québec or of the Parliament of Canada, or by an international agreement to which Québec or Canada is a party, or in order to carry out functions, powers and duties imposed on the Enterprise by law.

7.3. The processing of personal information is necessary in order to administer justice, to enforce a judgment or an act of another body or official that is enforceable under the law relating to the enforcement of judgments, or to comply with a subpoena, warrant or order made by a person or body having jurisdiction to compel the production of information.

7.4. The processing of personal information is necessary for the performance of a contract to which the data subject is a party, beneficiary or surety, and also for the conclusion of a contract at the initiative of the data subject, or of a contract under which the data subject will be a beneficiary or surety.

7.5. The processing of personal information is necessary for the exercise of the rights and lawful interests of the Enterprise or of third parties, or for the achievement of purposes of public interest, provided that the rights and freedoms of the data subject are not thereby infringed, and provided that the conditions of sections 18 to 18.4 of the Private Sector Act are met.

7.6. Processing is carried out of personal information to which access by an unlimited group of persons has been given by the data subject or at their request (hereinafter — publicly available personal information), including information having a public character by law within the meaning of section 1 of the Private Sector Act.

7.7. Processing is carried out of personal information that is subject to publication or mandatory disclosure in accordance with an Act.

7.8. **Personal information of minors.** In accordance with section 4.1 of the Private Sector Act, the consent required for the collection, use or communication of information concerning a minor under 14 years of age is given by the person having parental authority or by the tutor. A minor of 14 years of age or over may consent alone.

8. Procedure for the Collection, Storage, Communication and Other Processing of Personal Information

The security of the personal information processed by the Enterprise is ensured by the implementation of legal, organisational and technical measures necessary for full compliance with the requirements of the legislation in force in the field of the protection of personal information, having regard to the sensitivity of the information, the purposes for which it is used, its quantity, distribution and medium, as required by section 10 of the Private Sector Act.

8.1. The Enterprise ensures the preservation of personal information and takes all possible measures excluding access to personal information by unauthorised persons.

8.2. The personal information of the User will not at any time or under any conditions be communicated to third parties, save in cases connected with compliance with legislation in force, or where the data subject has given the Enterprise consent to the communication of the data to a third party for the performance of obligations under a civil-law contract, or where the communication is permitted without consent by sections 18 to 18.4 of the Private Sector Act. Where personal information is entrusted to a service provider, a written mandate or contract is concluded which sets out the measures the service provider must take to protect the confidentiality of the information, to use it only for the performance of the mandate, and to notify the Privacy Officer of any breach or attempted breach of those obligations (section 18.3 of the Private Sector Act).

8.3. Where inaccuracies are discovered in personal information, the User may update the information independently by sending the Enterprise a notice to the electronic mail address of the Enterprise legal@igsteam.org marked "Update of personal information". A request for access or rectification is answered within 30 days of its receipt, in accordance with section 32 of the Private Sector Act. Where the Enterprise refuses a request in whole or in part, it gives written reasons for the refusal, indicates the provision of the Act on which the refusal is based, and informs the person of the recourse available and of the time limit for exercising it.

8.4. The period of processing of personal information is determined by the achievement of the purposes for which the personal information was collected, unless another period is provided by contract or by legislation in force.

The User may at any time withdraw their consent to the processing of personal information by sending the Enterprise a notice by electronic mail to the electronic address of the Enterprise legal@igsteam.org marked "Withdrawal of consent to the processing of personal information".

8.5. All information that is collected by third-party services, including payment systems, means of communication and other service providers, is stored and processed by those persons in accordance with their terms of use and privacy policies. The data subject should acquaint themselves with those documents. The Enterprise bears no liability for the acts of third parties, including the service providers referred to in this clause.

8.6. Prohibitions established by the data subject on communication (other than the provision of access), and on the processing or the conditions of processing (other than the obtaining of access) of personal information permitted for dissemination, do not apply in the cases of processing of personal information in the public interest or in the other cases determined by applicable law.

8.7. In processing personal information, the Enterprise ensures the confidentiality of the personal information.

8.8. The Enterprise stores personal information in a form permitting the data subject to be identified for no longer than is required by the purposes of the processing of the personal information, unless a period of retention of the personal information is established by law or by a contract to which the data subject is a party, beneficiary or surety. Upon expiry of that period the information is destroyed or anonymised.

8.9. A condition for the cessation of the processing of personal information may be the achievement of the purposes of the processing of the personal information, the expiry of the period of validity of the consent of the data subject, the withdrawal of consent by the data subject or a request for the cessation of the processing of personal information, and also the discovery of unlawful processing of personal information.

8.10. Confidentiality incidents

Where the Enterprise has cause to believe that a confidentiality incident involving personal information it holds has occurred, it takes reasonable measures to reduce the risk of injury and to prevent new incidents of the same nature. Where the incident presents a risk of serious injury, the Enterprise promptly notifies the Commission d'accès à l'information du Québec and each person whose personal information is concerned, and may notify any person or body able to reduce the risk. The Enterprise keeps a register of confidentiality incidents, a copy of which is sent to the Commission at its request, in accordance with sections 3.5 to 3.8 of the Private Sector Act and the Regulation respecting confidentiality incidents.

9. List of Acts Performed by the Enterprise with the Personal Information Received

9.1. The Enterprise carries out the collection, recording, systematisation, accumulation, storage, updating (revision, modification), extraction, use, communication (dissemination, provision, access), anonymisation, restriction, deletion and destruction of personal information.

9.2. The Enterprise carries out automated processing of personal information with or without the receipt and/or transfer of the information received over information and telecommunications networks. The Enterprise does not render decisions based exclusively on automated processing of personal information which produce legal effects concerning a person or significantly affect them; if it does so, it complies with section 12.1 of the Private Sector Act and clause 4.1 of this Policy.

10. Communication of Personal Information Outside Québec

10.1. Before communicating personal information outside Québec, or before entrusting a person or body outside Québec with the task of collecting, using, communicating or keeping such information on its behalf, the Enterprise conducts a **privacy impact assessment**, in accordance with section 17 of the Private Sector Act.

10.2. The assessment takes into account, in particular: the sensitivity of the information; the purposes for which it is to be used; the protection measures, including contractual measures, that would apply to it; and the legal framework applicable in the State in which the information would be communicated, including the personal information protection principles applicable in that State.

10.3. The information may be communicated only if the assessment establishes that it would receive **adequate protection**, in particular in light of generally recognised principles regarding the protection of personal information. The communication is the subject of a **written agreement** that takes into account, in particular, the results of the assessment

and, if applicable, the terms agreed on to mitigate the risks identified in the assessment.

10.4. The Enterprise maintains a record of the assessments carried out and of the written agreements concluded, and provides them to the Commission d'accès à l'information du Québec at its request.

11. Confidentiality of Personal Information

The Enterprise and other persons who have obtained access to personal information are obliged not to disclose personal information to third parties and not to disseminate it without the consent of the data subject, unless otherwise provided by law. Every member of the personnel of the Enterprise and every service provider is bound by that obligation of confidentiality, which survives the end of their engagement.

12. Final Provisions

12.1. The User may obtain any clarifications on questions of interest concerning the processing of their personal information by contacting the Privacy Officer of the Enterprise by electronic mail at legal@igsteam.org.

12.2. This document will reflect any changes to the policy on the processing of personal information by the Enterprise. The Policy is valid indefinitely until it is replaced by a new version.

12.3. The current version of the Policy is freely available on the Internet at the address metrocraft36.com/legal/global/privacy_policy.pdf. The Russian-language edition of this Policy, which applies to Users of the Russian-language edition of the Game, is available at metrocraft36.com/legal/ru/privacy_policy.pdf.

12.4. **Language.** A French version of this Policy is published at https://metrocraft36.com/legal/fr/privacy_policy.pdf, in accordance with the Charter of the French language (CQLR c. C-11). *Une version française de la présente politique est publiée à l'adresse https://metrocraft36.com/legal/fr/privacy_policy.pdf.* In the event of any discrepancy between this English version and the French version, **the French version prevails** in respect of persons resident in Québec.

Supervisory authority

Commission d'accès à l'information du Québec

Bureau 500, 2535, boulevard Laurier, Québec (Québec) G1V 4M3

Bureau 900, 500, boulevard René-Lévesque Ouest, Montréal (Québec) H2Z 1W7

www.cai.gouv.qc.ca

Where PIPEDA applies to a given processing operation, a complaint may also be lodged with the **Office of the Privacy Commissioner of Canada**, 30 Victoria Street, Gatineau (Québec) K1A 1H3, www.priv.gc.ca.