# COMPLAINTS HANDLING POLICY

TRUDEL JOHNSTON & LESPÉRANCE

The purpose of this policy is to ensure that complaints are handled appropriately, consistently and diligently. It is directed at any person who is dissatisfied with the handling of his or her personal information.

### PURPOSE OF THE POLICY

The purpose of the Complaints Handling Policy is to establish a fair and transparent procedure for dealing with complaints received by TJL. It also aims to support the quality of our services, and to give everyone the opportunity to express their dissatisfaction.

This document provides a framework for the receipt of complaints, the acknowledgement of receipt, the creation of a complaint file and the compilation of complaints received, in the interests of listening and continuous improvement.

# RESPONSIBLE

The person responsible for applying the policy is Michel Bettez, Senior Paralegal.

The manager's main duties are to:

- Ensure that this policy is applied;
- Ensure that an acknowledgement of receipt is sent to the complainant;
- Investigate the complainant's claims;
- Respond to the complainant.

#### COMPLAINT

For the purposes of this policy, a complaint is an expression of dissatisfaction with TJL's protection of personal information by an individual who feels aggrieved.

A complaint does not include any action aimed simply at correcting personal information, as long as the problem is dealt with as part of TJL's



regular activities and without a written complaint having been filed by an individual.

#### RECEIPT OF COMPLAINT

Any person wishing to make a complaint must do so in writing by submitting the complaint to the address indicated at the end of this policy. The communication must include the following information:

- Name of the complainant;
- Address of the complainant;
- Phone number of the complainant;
- E-mail address or fax number of the complainant, if applicable
- Capacity in which the complainant is acting: In his/her own name, as guardian or holder of parental authority;
- Grounds for the complaint.

Anonymous complaints are considered as not having been received.

All complaints are treated confidentially.

Upon receipt of a complaint, an employee must forward it to the person responsible for applying this policy.

An employee who receives a verbal complaint must inform the person complaining of this policy and invite him or her to send his or her complaint in writing to the address provided.

The manager must acknowledge receipt of the complaint within 5 working days of receipt.

# CREATING A COMPLAINT FILE

To ensure fair and transparent handling, a separate file is kept for each complaint. The file includes the:

- Written complaint;
- Outcome of the complaint handling process (analysis and related documents);
- Final response to the complainant, in writing and with reasons.



### HANDLING A COMPLAINT

The complaints handling process is to be initiated within a maximum of 5 working days following receipt of the complaint.

Complaints must be processed within a reasonable timeframe, i.e., within 30 days of receipt of all the information required to investigate the complaint. In the exceptional event that a complaint cannot be processed within this timeframe, the complainant must be informed of the reasons for the delay and the steps taken by TJL to date in processing the complaint. The complainant must also be informed of the timeframe within which the decision will be communicated to him or her.

Once the complaint has been examined and the analysis completed, the manager must send the complainant a final, written, reasoned response.

### ENTRY INTO FORCE

This policy takes effect on September 22, 2023.

IF YOU HAVE ANY QUESTIONS OR COMMENTS ABOUT THE COMPLAINTS HANDLING PROCESS, PLEASE CONTACT THE PERSON RESPONSIBLE:

Mr. Michel Bettez (michel@tjl.quebec) or at the following address - Privacy Officer, Trudel Johnston & Lespérance, 750 côte de la Place-d'Armes, Suite 90, Montréal (QC) H2Y 2X8.

