



## Quebec “Law 25” FAQs

### What is Quebec Law 25 and who does it apply to?

Law 25 is the latest and most significant privacy legislation development in Canada. Law 25, formerly known as Bill 64, became the law in Quebec on September 22, 2022. The requirements under the law are being phased in over a three-year period. The majority of Law 25’s requirements must be met by September 22, 2023.

Most organizations established in Québec and/or doing business in Québec that are collecting, using, or disclosing personal information of individuals located in the province will be impacted. Foreign companies are likely impacted if they are collecting, using or disclosing personal information of individuals located in Quebec.

### What obligations do companies have under Quebec Law 25 and when do companies have to comply with them?

#### By September 22, 2022 companies must:

- Designate a privacy officer. This role will default to a company's CEO in the absence of a dedicated privacy officer.
- Notify the Commission d'accès à l'information and affected individuals of any confidentiality incidents, including privacy data breaches and the unauthorized access/use/disclosure of personal information.
- Keep a record of all security incidents for (5) five years.
- Collect individual’s consent for the use of biometric data and prior notification of the use to the Commission d'accès à l'information. Notify the Commission at least 60 days before the biometric database goes live and complete a privacy impact assessment for any project contemplating the use of biometric data. Finally, adopt a biometric data use policy (including alternative methods of authentication for employees).
- Processing of personal information in certain circumstances, including for a study, research purposes or the production of statistics will not require consent, but will have to comply with other requirements (including but not limited to, a privacy impact assessment and a contract with the entity receiving the personal information for this purpose).

#### By September 22, 2023 companies will have to:

- Conduct a mandatory Privacy Impact Assessments for the transfer of personal information outside of Québec in certain circumstances.

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- Third Party Contracts will have to contain mandatory provisions. In addition to basic contractual requirements, companies must disclose the possibility that the personal information being collected could be communicated outside of Québec at both the time of collection of personal information and upon request.
- Individual privacy settings for products or services must be configured to offer the highest level of confidentiality and privacy. Any tracking features need to be set to “off” by default. This requirement does not apply to cookies used as connection indicators.
- Afford rights of access, de-indexing (akin to the right to be forgotten under GDPR), and right to correct to Quebec residents.
- Anonymize or destroy personal information when the purposes for which it is collected or used have been achieved.
- Grant access to Quebec residents to the PI used to render any automated decisions, and the principal factors that led to the decision.
- Comply with public disclosure and notice requirements
- Comply with enhanced consent and transparency obligations:

By September 22, 2024 the companies will have to:

- Provide individuals with PI collected about them in a structured and commonly used technological format.

## What rights do individuals have under State Privacy Laws?

The law affords residents certain rights, such as the right to privacy by default, transparency, right of access, right to be informed about third parties that use their data, rights related to automated processing, right for additional information and right to portability.

For more information, including information on how individuals can exercise their rights under State Privacy Laws at Autodesk, please see Autodesk’s [Privacy Statement](#) and Autodesk’s [Trust Center Privacy](#) page.

## How does Autodesk comply with Quebec Law 25?

As a global company, Autodesk strives to comply with all applicable data protection laws where we do business. We have policies and procedures in place that are designed to address compliance with applicable data protection laws.

For more information, including information on how individuals can exercise their rights at Autodesk, please see our [Privacy Statement](#).