

AI chat agent on the website

Example Brokerage

Person in charge of the protection of personal information
Olivier Example, Chief Operating Officer

Project
AI chat agent on the website

Project type
Adoption of an artificial intelligence tool

Date
September 25, 2026

Version
1

In-depth

Level of review

4

Findings

1 gap, 3 to confirm

0

Priority risks

high severity and likelihood

1

Vendors outside Québec

5

Measures

1 Purpose and scope

Example Brokerage, a property and casualty insurer, is adding an artificial intelligence chat agent to its website. The agent answers visitors' questions about home and car insurance and collects the information a quote request needs: name, contact details, address, vehicle and past claims. Example Brokerage is undertaking the project for two purposes: to answer visitors' questions outside business hours, and to prepare quote requests for its brokers. The information is not intended for any other purpose.

The agent is supplied by a Québec company and relies on a language model from an American vendor to draft its answers. The agent does not set premiums and does not turn clients away. A broker takes over every request and makes every decision.

This assessment covers the personal information handled through the chat agent. That includes collection from visitors, hosting by the chat agent provider, processing by the language model vendor, access by Example Brokerage staff, and retention of the conversations. The project is expected to involve between 100 and 10,000 persons. The decisions brokers make after taking over a request are not made by the agent and are not the subject of this assessment.

Under the fourth paragraph of section 3.3 of the LPRPSP, the assessment is proportionate to the sensitivity of the information, the purposes of its use, its quantity, its distribution and the medium on which it is stored. On those factors, this assessment is carried out at a high level of detail.

- LPRPSP: Act respecting the protection of personal information in the private sector (CQLR, c. P-39.1).

2 Personal information concerned

Information	Nature	Persons concerned
Name, email, phone number and address	Contact details	Clients
Vehicle and past claims	Financial	Clients
Content of the conversations	Other	Clients

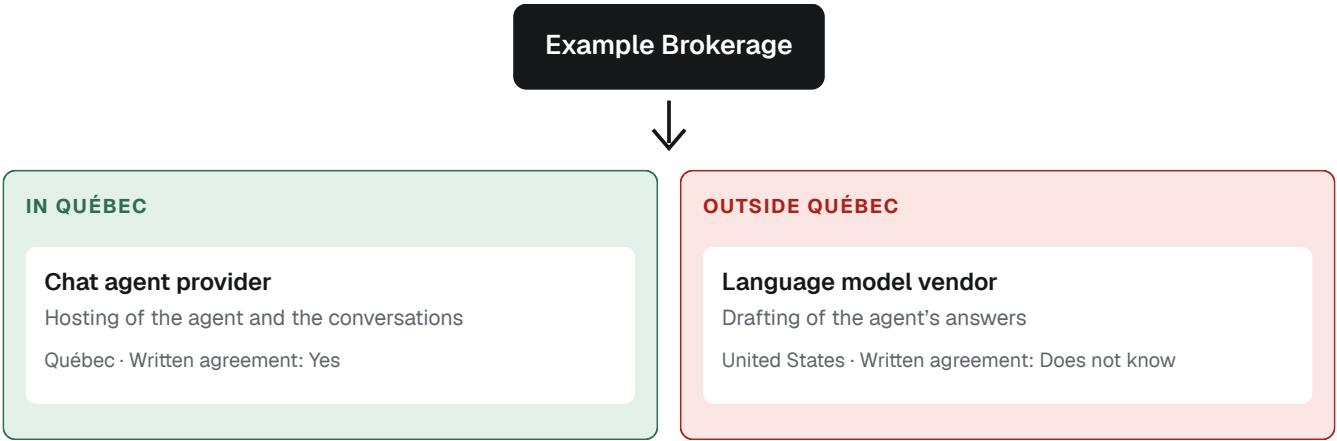
Factor (s. 3.3)	Finding
Sensitivity	medium
Purpose	Answer visitors' questions outside business hours; Prepare quote requests for the brokers
Quantity	100 to 10,000 persons
Distribution	At least one processing outside Québec
Medium	Cloud

3 Data flows

Personal information is collected directly from clients who visit the Example Brokerage website and use the chat agent. Through the conversation, the agent gathers their name, email address, phone number and home address, along with details of their vehicle and their past claims. The content of the conversations is itself retained as personal information. The persons concerned are not currently informed of how this information is handled.

The conversations are hosted in the cloud by the chat agent provider, a company located in Québec, which keeps the conversations under a written agreement with Example Brokerage. To draft the agent's answers, the content of the conversations is sent to a language model vendor located in the United States. Whether a written agreement exists with that vendor remains to be confirmed. It also remains to be confirmed whether the vendor keeps the conversations and, if so, for how long.

Within Example Brokerage, access to the information is limited to the staff who need it. The information comes back to the organisation as quote requests prepared for the brokers, who take over each request and make every decision. Visitors receive the answers drafted by the agent. No retention period has been defined for the conversations and the information collected, and this remains to be confirmed. It also remains to be confirmed whether the information collected can be communicated to the persons concerned in a structured format.



Processing	Vendor	Location	In Québec	Written agreement

Processing	Vendor	Location	In Québec	Written agreement
Hosting of the agent and the conversations	Chat agent provider	Québec	Yes	Yes
Drafting of the agent's answers	Language model vendor	United States	No	Does not know

4 Findings and risks

Findings

To confirm

LPRPSP, ss. 17 and 18.3

No written agreement with Language model vendor, outside Québec

Section 17 requires that a communication outside Québec be the subject of a written agreement that takes the results of the assessment into account. Section 18.3 requires that the mandate or contract be in writing and specify the protection measures the vendor must take.

Answer: does not know

To confirm

LPRPSP, ss. 23 and 3.2

No retention period defined

Section 23 requires destroying or anonymising information once the purposes of its collection are achieved, and section 3.2 requires policies governing its retention and destruction.

Answer: does not know

Gap

LPRPSP, s. 8

Persons concerned not informed

Section 8 requires informing the person concerned, when the information is collected, of the purposes, the means and their rights, and where applicable of the third parties it is communicated to and of the possibility that it be communicated outside Québec.

Answer: no

To confirm

LPRPSP, s. 3.3

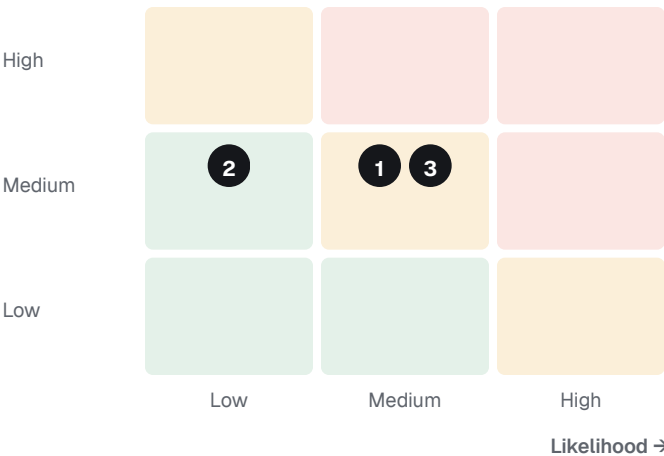
No communication in a structured format

Section 3.3 requires that the project allow computerised information collected from the person concerned to be communicated to them in a structured, commonly used technological format.

Answer: does not know

Risks

Severity ↑



- 1 Information processed outside Québec without adequate protection
- 2 Unauthorised access to the information
- 3 Retention longer than necessary

#	Risk	Severity	Likelihood	Sections
1	Information processed outside Québec without adequate protection	medium	medium	LPRPSP, s. 17
2	Unauthorised access to the information	medium	low	LPRPSP, ss. 20 and 10
3	Retention longer than necessary	medium	medium	LPRPSP, s. 23

5 Communication outside Québec

Language model vendor - United States

Factor (s. 17)	Finding
1. Sensitivity of the information	medium
2. Purposes of its use	Drafting of the agent's answers
3. Protection measures, including contractual ones	Written agreement: Does not know
4. Legal framework of the State	The United States has no general federal privacy law. Protection varies by state and by sector, and government access regimes are broader than in Québec. These points describe the legal framework; they do not conclude that it is adequate.

The organisation's conclusion (to complete): section 17 allows the communication if the assessment establishes that the information would receive adequate protection, and requires a written agreement.

6 Measures adopted

The measures below follow from the characteristics of the project. For each one, the organisation states whether it is in place or planned, and who is responsible.

	In place	Planned	Responsible
Determine the purposes before collecting, and collect only the information necessary for them. LPRPSP, ss. 4 and 5	☐	☐	_____
Take reasonable security measures given the sensitivity, purposes, quantity, distribution and medium of the information. LPRPSP, s. 10	☐	☐	_____
Sign a written agreement with each vendor outside Québec that takes the results of this assessment into account. LPRPSP, s. 17	☐	☐	_____
Inform the persons concerned, at collection, that their information may be communicated outside Québec. LPRPSP, s. 8	☐	☐	_____

	In place	Planned	Responsible
Set out the procedure for confidentiality incidents, and record each incident in the incident register. LPRPSP, ss. 3.5 and 3.8	☐	☐	

7 Conclusion

The assessment brought four findings to light. First, it has not been confirmed that a written agreement exists with the language model vendor, which processes the conversations outside Québec. Second, no retention period has been defined. Third, the persons concerned are not informed. Fourth, it is not known whether the information can be communicated in a structured format.

The main risks identified are the processing of information outside Québec without adequate protection, which is of medium severity and medium likelihood, and retention longer than necessary, also of medium severity and medium likelihood. A risk of unauthorised access to the information was also identified, of medium severity and low likelihood. The overall sensitivity of the information is assessed as medium. Several points remain to be confirmed, notably whether the American vendor keeps the conversations and for how long.

Example Brokerage adopts the five measures set out in this document to address these findings and risks.

This document was drafted from the organisation's answers. It applies the cited provisions to those answers and does not constitute legal advice. The organisation adopts it under the responsibility of its person in charge of the protection of personal information.

Adoption

The organisation adopts this assessment and the measures it sets out.

Name: Olivier Example

Title: Chief Operating Officer

Date:

Signature:

Appendix: the organisation's answers

Question	Answer
Project type	Adoption of an artificial intelligence tool
Purposes	Answer visitors' questions outside business hours; Prepare quote requests for the brokers
Use for a new purpose	No
Quantity	100 to 10,000 persons
Medium	Cloud
Retention period defined	Does not know
Access limited to staff who need it	Yes
Decision based exclusively on automated processing	No
Human review of the decision	Yes
Identification, location or profiling technology	No
Product offered to the public with privacy settings	No
Collection from minors under 14	No
Persons concerned informed	No
Communication in a structured format possible	Does not know
Person in charge consulted from the start	Yes