

Website redesign and its quote request form

Example Renovation

Person in charge of the protection of personal information
Nadia Example, Co-owner

Project
Website redesign and its quote request form

Project type
Overhaul of an existing system

Date
September 25, 2026

Version
1

In-depth

Level of review

2

Findings

1 gap, 1 to confirm

0

Priority risks

high severity and likelihood

4

Vendors outside Québec

5

Measures

1 Purpose and scope

Example Renovation, a residential contractor, is redesigning its existing website. The new site will include a quote request form where visitors enter their name, email address, phone number, the address of the work, a description of their project and photos of their home. Example Renovation undertakes this project to receive quote requests through its website and to measure traffic on the site. The information collected will not be used for any purpose other than these two.

This assessment covers the personal information handled by the redesigned website. That includes the quote request form, the protection of the form against bots, the delivery of requests by email, the hosting of the site and of the database where requests are kept, and the measurement of site traffic. The project is expected to involve between 100 and 10,000 persons, and the information is handled in the cloud. The assessment does not extend to other systems or activities of Example Renovation that are not described here. In particular, it does not cover how quotes are prepared or followed up once a request has been received.

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 and phone number	Contact details	Public
Address of the work	Contact details	Public
Project description and photos of the home	Other	Public
IP address and pages visited	Behaviour or preferences	Public

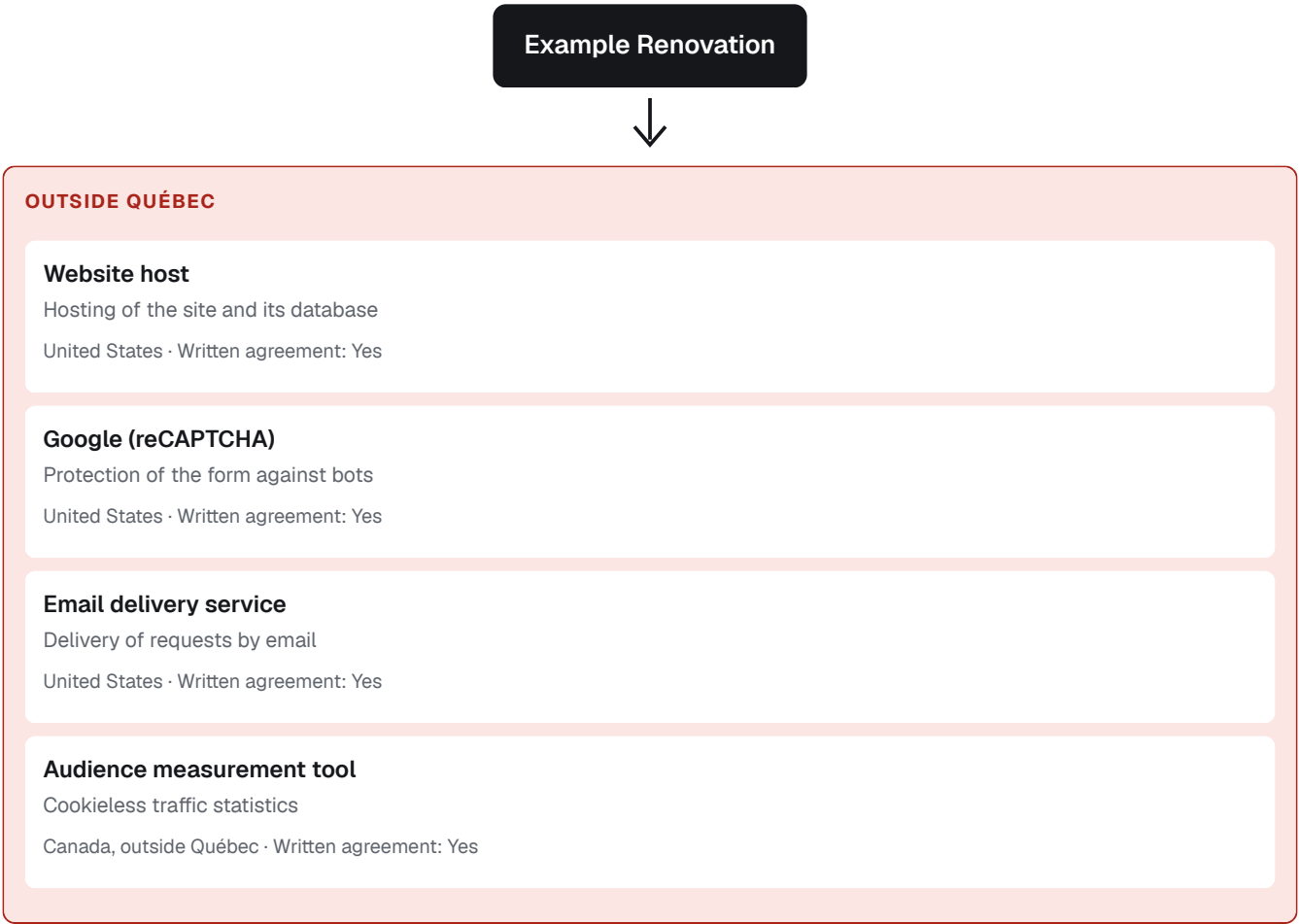
Factor (s. 3.3)	Finding
Sensitivity	medium
Purpose	Receive quote requests; Measure site traffic
Quantity	100 to 10,000 persons
Distribution	At least one processing outside Québec
Medium	Cloud

3 Data flows

Personal information is collected directly from visitors to the website. Everyone who browses the site has their IP address and the pages they visit processed by a Canadian audience measurement tool, located outside Québec, which produces traffic statistics without setting cookies. Visitors who fill in the quote request form provide their name, email address, phone number, the address of the work, a description of their project and photos of their home. Before the request is submitted, the form is checked against bots by Google's reCAPTCHA service, which operates in the United States. Visitors are informed of this processing, and the privacy policy is being updated to name the vendors involved.

Once submitted, each request is stored in the website's database and is also sent to Example Renovation by email. The database and the site itself are hosted by a website host in the United States. The email is delivered through an email delivery service, also in the United States. Example Renovation has a written agreement with each of the four vendors.

Within Example Renovation, access to the information is limited to staff who need it. What comes back to Example Renovation is each quote request, received by email, and the traffic statistics produced by the audience measurement tool. No decision about visitors is made exclusively by automated means. No retention period has yet been defined for the requests kept in the database and in email, or for the traffic data, and this remains to be determined.



Processing	Vendor	Location	In Québec	Written agreement
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Processing	Vendor	Location	In Québec	Written agreement
Hosting of the site and its database	Website host	United States	No	Yes
Protection of the form against bots	Google (reCAPTCHA)	United States	No	Yes
Delivery of requests by email	Email delivery service	United States	No	Yes
Cookieless traffic statistics	Audience measurement tool	Canada, outside Québec	No	Yes

4 Findings and risks

Findings

Gap

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: no

To confirm

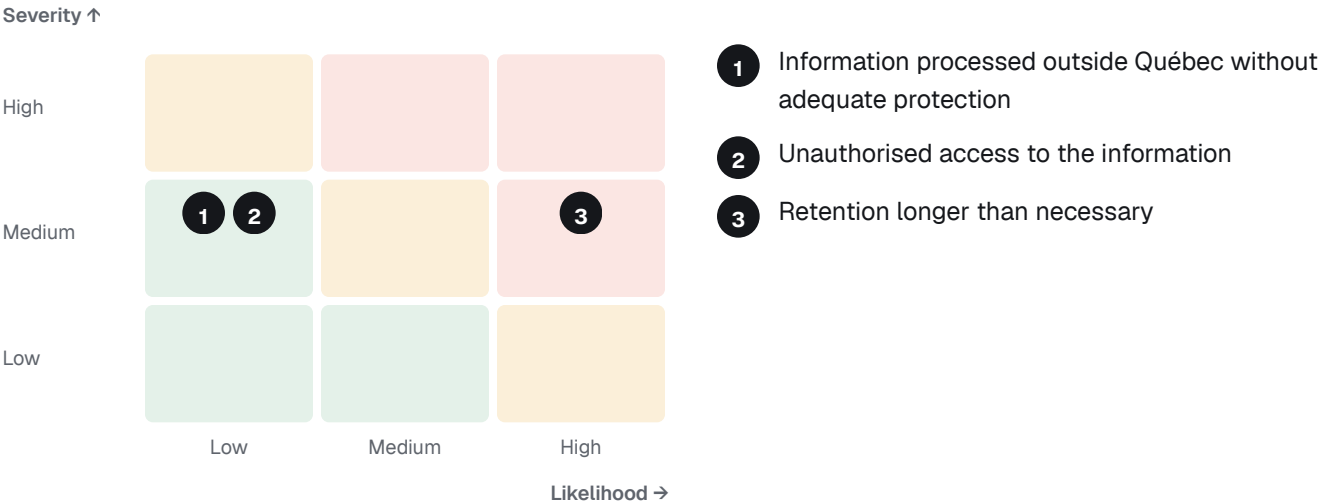
LPRPSP, s. 3.3

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



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

5 Communication outside Québec

Website host · United States

Factor (s. 17)	Finding
1. Sensitivity of the information	medium
2. Purposes of its use	Hosting of the site and its database
3. Protection measures, including contractual ones	Written agreement: Yes
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.

Google (reCAPTCHA) · United States

Factor (s. 17)	Finding
1. Sensitivity of the information	medium
2. Purposes of its use	Protection of the form against bots
3. Protection measures, including contractual ones	Written agreement: Yes
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.

Email delivery service · United States

Factor (s. 17)	Finding
1. Sensitivity of the information	medium
2. Purposes of its use	Delivery of requests by email
3. Protection measures, including contractual ones	Written agreement: Yes
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.

Audience measurement tool · Canada, outside Québec

Factor (s. 17)	Finding
1. Sensitivity of the information	medium
2. Purposes of its use	Cookieless traffic statistics
3. Protection measures, including contractual ones	Written agreement: Yes
4. Legal framework of the State	Elsewhere in Canada, the private sector is governed by the federal act (PIPEDA) or by a provincial act recognised as substantially similar. 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	☐	☐	_____
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 two findings to light. First, no retention period has been defined for the information collected through the website. Second, it remains to be confirmed whether Example Renovation is able to communicate personal information to a person who asks for it in a structured, commonly used technological format. The assessment also identified three risks. The main one is keeping information longer than necessary, judged of medium severity and high likelihood because no retention period exists. The other two are the processing of information outside Québec without adequate protection and unauthorised access to the information, each judged of medium severity and low likelihood. These risks arise in a context where three vendors process the information in the United States and requests may contain photos of the home and the address of the work.

Example Renovation adopts the five measures set out in this document to address these findings and risks. It will review their implementation with Nadia Example.

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: Nadia Example

Title: Co-owner

Date: _____

Signature: _____

Appendix: the organisation's answers

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