

Privacy policy

Product Passport

Last updated: [September 4th, 2026]

Product Passport (“Studio Affordance,” “we”) is committed to protecting the personal information of individuals who interact with the Product Passport website (the “Site”), whether as a visitor or a customer. This policy describes our practices in this regard, in accordance with Quebec’s Act respecting the protection of personal information in the private sector (“Law 25”).

In summary:

- visitors who browse the Site or a product passport are not required to provide anything: no account creation, no geolocation, and no cookies are imposed on them;
- client companies (“Clients”) must create an account to submit the documents required to create their product passport and to update it as needed;
- the content of product passports is generated using an artificial intelligence tool developed specifically by and for Product Passport, which summarizes the documents provided by Clients;
- the Site uses MapTiler to display maps, which results in a transfer of information outside Quebec (Section 5);
- a product passport may contain external links to a site where the product can be purchased or to social media for sharing purposes; these links are governed by the privacy policies of those third parties (Section 6).

1. Person responsible for the protection of personal information

In accordance with Law 25, we have designated a person responsible for the protection of personal information within our organization. Any question, comment, or request regarding this policy or your personal information may be addressed to that person:

- Name: Florence Girard-Laperrière, Project Manager
- Email: confidentialite@productpassport.ai
- Mailing address: 160 Saint-Viateur East St, #300, H2T 1A8, Montreal, QC, Canada

1. Scope

This policy applies to two categories of individuals:

- **Visitors:** any person who views the Site or a product passport without holding an account.
- **Clients:** companies, and the individuals who represent them, who create an account in order to submit the documents required to create or update a product passport.

3. Personal information collected

3.1 Visitors

The Site does not request, collect, or retain any personally identifiable information from visitors who view the Site or a product passport. In particular:

- no account creation is required to browse the Site;
- no geolocation data is collected;
- no form, identification field, or contact information is requested from visitors.

As with the vast majority of websites, our hosting provider may automatically collect certain technical browsing data (for example, IP address, browser type, or request timestamps) for strictly technical and security purposes. This data is not used to identify an individual.

3.2 Client accounts

To submit the documents required to create a product passport, or to update it as needed, a Client representative must create an account. For this purpose, we collect:

- the name of the Client's representative;
- their professional email address;
- a password, stored in encrypted form;
- the name of the client company and, where applicable, its business contact information.

This information is used solely to authenticate account access, to enable the submission and management of documents, and to communicate with the Client regarding its product passport.

3.3 Documents provided for the creation of a product passport

As part of creating or updating a product passport, the Client provides us with records describing the production chain of its products (for example, technical data sheets or manufacturing, sourcing, or processing data). These documents are primarily commercial and technical in nature; they may occasionally contain personal information concerning representatives of the Client or its business partners (for example, the name of a contact person).

The Client remains responsible for ensuring that it holds the necessary rights and authorizations, including any required consent, to provide us with these documents. We use these documents solely for the purpose of generating, displaying, and keeping the Client's product passport up to date, and for no other purpose.

4. Use of artificial intelligence

We use an artificial intelligence tool developed in-house to automatically analyze and summarize the documents provided by Clients (Section 3.3), for the purpose of generating the structured, plain-language content presented in product passports.

- This use is solely intended to facilitate the presentation of technical and commercial product information; it is not used to evaluate, profile, or make a decision about an individual.
- Content generated by the artificial intelligence tool is reviewed and validated by the client before being published in a product passport.
- If processing by these tools involves transmitting information to a provider whose infrastructure is located outside Quebec, the same safeguards described in Section 5 for MapTiler apply, including a privacy impact assessment carried out in accordance with Section 17 of Law 25.

5. Mapping and transfer of data outside Quebec — MapTiler

The Site uses the MapTiler service to visually represent the production chain of products on an interactive map within product passports. To display map tiles, the browser of the person viewing the Site communicates directly with MapTiler's servers, resulting in the transmission of certain technical browsing data (including IP address) to those servers, which are located outside Quebec.

In accordance with Section 17 of Law 25, a privacy impact assessment relating to this transfer has been carried out. This assessment concluded that the information transmitted to MapTiler benefits from adequate protection, notably due to that provider's security measures and contractual commitments, and that this transfer is necessary for the mapping functionality offered by the Site.

For more details, you may consult MapTiler's privacy policy: <https://www.maptiler.com/privacy-policy/>

6. External links: purchasing and social media sharing

A product passport may contain external links, in particular to allow access to a page where the featured product can be purchased or to allow the passport to be shared on social media.

These links lead to sites or platforms operated by third parties, independent of Product Passport. Product Passport itself does not place any cookies or collect any information when you use these links; however, the external site or platform to which you are directed may, according to its own practices, collect information about you (for example, your IP address) or place its own cookies.

We have no control over these third-party sites or platforms and disclaim any responsibility for their privacy practices. We encourage you to review the privacy policy specific to each external site or platform before providing it with any information.

7. Cookies

The Site does not use any cookies for visitors who browse the Site or a product passport without being logged in, nor any similar tracking technology with respect to them.

With respect to a client with a product passport account:

To allow a Client to remain logged in to their account, the client area may use cookies that are strictly necessary for session authentication. These cookies are not used for any analytical or advertising purpose and are not subject to any tracking outside the Site.

7.1. Collection and purposes of processing

To allow you to create an account, log in, and maintain your session securely, we use the third-party service Clerk (Clerk, Inc.). In performing our services, Clerk collects and processes the following personal information:

- **Google sign-in (OAuth):** your unique Google identifier, your email address, your last name, your first name, and the URL of your profile photo.
- **Email sign-in:** your email address and its verification status.
- **Technical security data:** your IP address, browser type, device operating system, and your session activity history.

7.2. Use of tracking technologies and cookies

In accordance with Law 25, we inform you that our authentication system places essential cookies on your browser:

- **session:** a temporary encrypted session token (JWT) valid for 60 seconds, continuously refreshed as you browse, used to identify you from page to page in an anonymized manner.
- **client_uat:** a technical cookie recording the time of your last interaction in order to manage session inactivity.

Note: These cookies are strictly necessary to provide the authentication service requested by the user and are not used for any advertising or marketing profiling.

7.3. Transfer outside Quebec

Personal information collected for authentication purposes is transferred to and hosted on the servers of our subcontractor, Clerk, located outside the province of Quebec (including in the United States). We ensure, by contractual agreement, that this transfer benefits from protection measures that are adequate and equivalent to those required in Quebec. To learn more, you may consult [Clerk's privacy policy](#).

7.4. Retention and destruction of data

This information is retained by Clerk for as long as your account remains active on our platform. If your account is closed or deleted, your personal information associated with authentication will be permanently destroyed or securely anonymized within a reasonable period, in accordance with legal requirements.

8. Disclosure to third parties and service providers

We do not sell, rent, or disclose your personal information to third parties, except:

- to the providers mentioned in this policy (MapTiler, our artificial intelligence solution provider(s), our hosting provider), who act on our behalf and use the information only in accordance with our instructions and for the purposes described herein;
- where required by law, including in response to a court order or a request from a public body authorized by law.

9. Retention and destruction of information

- **Visitors:** since no personally identifiable information is collected, no such retention takes place, apart from the technical data mentioned in Section 3.1, which is destroyed or anonymized after the period necessary for its purposes.
- **Client accounts and submitted documents:** retained for as long as the account is active and the product passport is kept up to date, after which they are securely destroyed or anonymized.

10. Security measures

We apply reasonable security measures appropriate to the nature of the information processed, including: encryption of communications (HTTPS), password encryption, access to Client accounts and documents restricted to individuals who require it to perform their duties, as well as monitoring to detect and address any security incidents.

11. Your rights

In accordance with Law 25, you have the following rights with respect to the personal information we hold about you:

- the right to access it;
- the right to have inaccurate, incomplete, or ambiguous information corrected;
- the right to withdraw your consent to its collection, use, or disclosure, at any time, subject to legal restrictions;
- the right to request that the dissemination of information about you cease, or that any hyperlink providing access to it be de-indexed, where the conditions provided for by law are met.

To exercise any of these rights, please contact the person identified in Section 1. If your name appears in a document submitted by a Client (for example, as a contact person), we encourage you to first contact that Client, who remains responsible for that information; you may also contact us, and we will forward your request to the Client concerned.

12. Complaints

If you believe your rights have not been respected, you may first contact our person responsible for the protection of personal information, or file a complaint with the Commission d'accès à l'information du Québec (CAI):

<https://www.cai.gouv.qc.ca>

13. Changes to this policy

We may amend this policy from time to time, in particular to reflect changes in our practices or service providers. Any material change will be posted on this page along with its update date. We encourage you to review it periodically.

14. Contact us

For any questions regarding this privacy policy:

- Studio Affordance
- Email: confidentialite@productpassport.ai
- Mailing address: 160 rue Saint-Viateur Est, Suite #300, H2T 1A8, Montréal, QC, Canada