



TransLink Enterprise Privacy Policy

This Statement was revised June, 2015.

Last Update: December 2010

The TransLink Enterprise Privacy Policy reflects the requirements of the [Freedom of Information and Protection of Privacy Act](#) (FOIPPA), the regulatory requirements of the *South Coast British Columbia Transportation Authority Act (the “Act”)* and other relevant legislation.

INTRODUCTION

The South Coast British Columbia Transportation Authority (“TransLink”) is the regional transportation authority responsible for public transportation in the Metro Vancouver region. TransLink’s public transit services include bus, community shuttle, ferries (SeaBus), rapid transit (SkyTrain), commuter rail (West Coast Express) and custom transit services for persons with disabilities (Access Transit).

TransLink is committed to protecting your personal information. FOIPPA sets out the terms under which a public body can collect, use and disclose personal information and requires that reasonable steps be taken to protect the information they hold. FOIPPA defines personal information as recorded information about an identifiable individual other than contact information.

This Policy reflects our long-standing commitment to the protection of the privacy of the personal information in all of our business operations. It is designed to promote the transparency of our privacy practices for the reasonable collection, use and disclosure of personal information in the course of providing transportation services.

DEFINITIONS

Business Contact Information – means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual. Generally this is referred to as business card data.

Collection – the act of gathering, acquiring, recording or obtaining personal information from any source, including sources other than from the individual to whom the personal information belongs, by any means.

Disclosure – the act of making personal information available outside of TransLink and to sharing of the information within TransLink.

“Need to Know” Principle – means access to information based on a legitimate need to use the personal information for the execution of one’s duties.

Notice – means providing you with information on:

- the nature and purpose of the information to be collected;
- the legal authority for collecting the information and;
- the person within TransLink from whom you may obtain more information.

Records – include books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records. Only records “in the custody or under the control” of TransLink are subject to FOIPPA.

Use – the treatment, handling, management and retention of Personal Information.

ACCOUNTABILITY

TransLink is accountable for the personal information in its custody and/or under its control. TransLink has designated a Privacy Officer to oversee compliance to this Policy and to ensure adherence to FOIPPA and its regulations.

Our procedures are reviewed regularly to ensure compliance with FOIPPA, other pertinent laws and leading practices. TransLink will make readily available any information about its policies and practices governing the management of personal information including information that outlines the information handling practices and a description of the type of information held by TransLink, and how it is collected, used and disclosed.

The TransLink Privacy Officer can be contacted at:

400-287 Nelson’s Court,
New Westminster, B.C. V3L 0E7
Telephone: 778.375.7500
Email: privacy@translink.ca

In addition to developing this Policy, TransLink has established policies that address the prohibition to the unauthorized access, use or disclosure of personal information, respond to employee access requests, inquiries or complaints, and outline the limits on employee privacy on corporate-issued mobile and computing devices.

COLLECTION OF PERSONAL INFORMATION

TransLink (together with its operating subsidiaries) collects personal information in order to operate the regional transportation system. We will make reasonable efforts to ensure that we only collect personal information that is necessary for the purposes identified.

We will notify you as to the purpose of the collection of personal information, as required by FOIPPA. For example, you will see notices on forms you may be asked to complete, signage posted on our transit vehicles, and facilities where we operate video surveillance equipment.

The types of personal information we collect include the following:

- **Compass Card** – registered cardholder information
- **Bus and Rail Operations** - Video and audio footage on transit vehicles and facilities; incident reports; transit alerts subscriptions
- **Access Transit** – applicant and registered user information including health information; travel history; video and audio footage on HandyDart vehicles and facilities; incident reports
- **Cycling Program** – bike locker rental information
- **Customer Relations** – contact and other information related to questions, commendations and complaints
- **Golden Ears Bridge** – vehicle registration information; registered user information
- **Marketing and Public Consultation** – contact information; public feedback; market research; contest entrants information; emails for newsletters and promotions
- **Claims** – claimant and witness information; incident investigations
- **Human Resources** – applicant information; employee information; beneficiary information
- **Fare Infraction Tickets** – identification of individuals who have committed fare infractions

Most of the personal information we collect is provided by you when you apply, register, sign-up, or consent to a program or activity. Any other method of collection will only be used if it is permitted by FOIPPA.

The personal information may be collected by TransLink or by our contractors, on our behalf. TransLink uses partners to provide some of our services and they may be required to collect personal information on our behalf. We ensure that all our partners adhere to the requirements of FOIPPA through contractual agreements.

USE AND DISCLOSURE OF PERSONAL INFORMATION

TransLink will limit the use and disclosure of personal information in our custody and control to those permitted by FOIPPA. For example, there are a number of specific purposes for which we use and disclose personal information:

- to process your account credentials, passwords, communicate offers, and updates to our services and other information, if you have signed up to access to our websites;
For example, your email and password will be used to authenticate you so you can make changes to your profile, update your newsletter preferences and participate in contests and special promotions (if you've provided your consent in advance);
- to resolve disputes, mitigate or attempt to prevent fraud, investigate privacy and security incidents;
For example, during a privacy breach investigation, incident details may be shared with the Privacy Commissioner as part of our breach reporting due diligence program
- to investigate safety and security incidents on the transit system;
For example, we may use video surveillance to investigate safety and security incidents on the transit system; this may be disclosed to law enforcement in accordance with FOIPPA requirements
- to issue fare infraction tickets, collect ticket amounts and for the purpose of court proceedings in accordance with the Act.
For example, if a ticket remains unpaid, TransLink may share information with a collection agency for the purpose of recovering the debt.

Translink will not sell, trade or rent any personal information to third parties for marketing or any other commercial purpose.

Personal information may be collected, used or disclosed without consent in limited circumstances where the conditions make it impossible or impractical to seek consent such as emergencies, health, safety and security of our employees, customers and the public or to collect outstanding debts or in the prevention of fraud or to comply with a subpoena, warrant or otherwise required by law.

HOW WE PROTECT YOUR PERSONAL INFORMATION

At TransLink, we recognize the importance of protecting your personal information during the course of providing transit services. We take reasonable steps to protect your personal information using physical, electronic and procedural security measures appropriate to the sensitivity of the information in our custody or control.

The standards may include safeguards to protect your information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification regardless of the format in which it is held.

Our internal policies and procedures, based on “need-to-know” principles, restrict access to your information. We audit our procedures and measures regularly to ensure they are being administered properly and remain effective.

Our suppliers, as part of the contractual arrangements, are bound by confidentiality clauses and may not use the information for any unauthorized purpose. We comply with FOIPPA regarding the storage of personal information.

TransLink will not include personal information on an email and ask you to verify it. If you get an email from TransLink asking for personal information, do not respond or open it or click any of the links or open attachments contained with the email. Please contact our customer service immediately.

HOW LONG YOUR INFORMATION IS KEPT

TransLink retains records in accordance with the requirements of FOIPPA, our legal obligations, and business requirements. We have developed a Records Management Policy that provides employees guidance on the practices and procedures for records retention and subsequent disposal.

HOW YOU CAN ACCESS YOUR PERSONAL INFORMATION

You may access your personal information held by TransLink at any time by making an information access request at [Freedom of Information Process](#). Your information may be used to notify departments to facilitate the record search or may be shared with the Office of the Information and Privacy Commissioner of BC (OIPC) in response to a request for a review or deal with a complaint.

GENERAL

a. VISITORS TO WWW.TRANSLINK.CA

Cookies/tokens are small pieces of information created by a web server and stored on a user's computer.

TransLink uses cookies/tokens to identify a user's computer, keep track of preferences, recognize users who are returning to the website, for passive clickstream collection and browsing patterns. Our cookies do not store personal information.

TransLink uses Google Analytics to provide insight such as website usage, aggregated demographic and interest tracking. TransLink gathers and compiles this information for statistical analysis and reporting purposes.

How to adjust your cookie settings: You can change the setting of your browser's "cookies" to suit your preferences. In most browsers, your cookies options can be changed under "Tools", "Privacy", "Options" or "Security." You may need to check your browser's "Help" function to find the exact path to the cookies setting.

b. SPECIAL NOTE FOR PARENTS

TransLink does not knowingly process personal information from individuals under the age of 19 without the consent of the parent or legal guardian. Our websites are not directed at children, and we request that children under the age of 13 not provide personal information through the website. We request that parents or guardians monitor their children's use of our website.

c. OTHER THIRD PARTY WEBSITES

Our websites may contain links to third party websites. These linked sites are not under TransLink's control and we are not responsible for the privacy practices or the contents of any such linked site, or any link contained in any linked site. We provide such links only as a convenience, and the inclusion of a link on the TransLink website does not imply endorsement of the linked site by TransLink. You should familiarize yourself with the privacy policies and practices of any such third parties.

d. CHOICE

We comply with the recently enacted [Canadian Anti-Spam Law](#). If at any time you wish to stop receiving emails from us, please just let us know by emailing, calling or writing to us using the contact information listed under Contact Us on our website or by simply using the unsubscribe feature in the email you received.

FOR MORE INFORMATION ABOUT THIS POLICY

We welcome your questions or comments regarding this Policy and how we manage your personal information and privacy expectations. All reports of suspected non-compliance with this Policy will be investigated by TransLink in accordance with its Privacy Breach and Complaint Reporting Policy. If you have any questions or concerns about how the TransLink manages your information, you can take the following steps to obtain more information:

1. Review this TransLink Enterprise Privacy Policy and additional information about other policies, including our Video Surveillance and Audio Recording Privacy Statement or Compass Card and Fare Gate Privacy Statement.
2. If you have questions or concerns about your privacy, please feel free to contact us and our customer service representatives will be delighted to speak to you.
3. If you still have unresolved concerns, please contact the TransLink Privacy Officer at:
400-287 Nelson's Court,
New Westminster, B.C. V3L 0E7
Telephone: 778.375.7500
Email: privacy@translink.ca

The TransLink Privacy Officer will review your concerns confidentially.

4. If the TransLink Privacy Officer does not resolve the issue to your satisfaction, you may seek advice from the Office of the Information and Privacy Commissioner of BC at:
PO Box 9038, Stn. Prov. Govt.
Victoria, B.C. V8W 9A4
Telephone: 250.387.5629
Email: info@oipc.bc.ca

However, you are encouraged to follow the steps one through three above first.

In this statement, the words “we”, “our” or “TransLink” refers to the South Coast British Columbia Transportation Authority and its operating subsidiaries (Coast Mountain Bus Company, BC Rapid Transit Company Ltd., and West Coast Express Limited).

If you have any questions concerning the collection, use & disclosure of personal information by the Metro Vancouver Transit Police, please contact them directly at 300-287 Nelson's Court, New Westminster, B.C., V3L 0E7, by phone at 604.515.8300, through our website www.transitpolice.bc.ca or directly by email via privacy@transitpolice.bc.ca.

CHANGES TO THIS POLICY

This Policy is current as of the Last Update date. We will occasionally update our privacy practices so that they remain current with changing technologies and applicable laws. When we post changes to this Policy, we will revise the Last Update date listed in this Policy. If there are material changes, we will prominently post a notice of the changes on our website before they take effect at www.translink.ca/privacypolicy.

We encourage you to periodically review this Policy and how TransLink protects your information.