

TransLink is committed to protecting personal information. Any personal information you provide to TransLink is collected, used and disclosed in accordance with the *Freedom of Information and Protection of Privacy Act* (FOIPPA) and other applicable laws. In the province of British Columbia, FOIPPA establishes the privacy obligations and standards with which public bodies must comply, regarding the management of 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.

TransLink's current **Privacy Policy** outlines the organization's general privacy practices, while this "Compass Card Privacy Statement" ("Statement") is designed to inform you of our privacy practices and describes how we collect, protect and disclose your personal information as it relates to the Compass Card program.

PROGRAM COMPASS CARDS

The information in this Statement applies to all Compass Cards. There are also special considerations for program passes including, for example, U-Pass BC, CNIB, BC Bus Pass and the TransLink Employee Pass program participants. To meet the criteria of these programs, we may collect your name, birth date, participant ID numbers and/or photographs.

TransLink will use this information to create a program-based Compass Card just for you. Once the card is printed, your personal information, including your photo, is destroyed. From then on, TransLink will not have access to any of this personal information unless you choose to register your Compass Card.

THE PERSONAL INFORMATION WE COLLECT ABOUT YOU

Unless you choose to share personal information with us, you'll be anonymous.

You don't have to register your card, but if you decide to, we'll require some information, so we can provide assistance and services. You'll also have the option to request additional information from TransLink that might interest you.

Registration is easy and can be done on our website, over the phone or at our in-person customer service centre. We'll ask for you:

- name
- address
- Compass Card serial number
- email address
- phone number

We'll also ask you to set up a PIN for the automated customer-support phone system. For registered customers who would like access to our website, we'll ask for a username, password and a security question and answer, so we can verify who you are later.

It is important that you do not share your passwords or security answer with anyone. TransLink will not include personal information in an email and ask you to verify it. If you get an email asking for personal information from TransLink, please contact customer service immediately. Do not answer the email.

If you set-up the AutoLoad feature, you'll need to provide a payment mechanism (either a credit card or banking information) to pay for your Monthly Pass or to top-up your Stored Value. You can also choose to have a credit card on file for future purchases so you don't have to enter it every time. We employ stringent security safeguards to protect your payment details.

For one-time purchases, including online transactions, we'll keep your information long enough to authorize and confirm payment. Once the transaction has been completed, we'll erase your personal information from our systems.

HOW WE USE YOUR PERSONAL INFORMATION

We'll use personal information for:

- checking your identity to keep your information safe;
- billing you for services you request;
- processing refunds;
- communicating information related to your account (e.g.: changes, purchases, expiries, AutoLoad information and updates)

If you register your Compass Card, we may use your information to send you:

- transit-service information and updates;
- promotions or offers;
- event invitations;
- market research or survey requests;
- community public-consultation announcements; or
- other future benefits.

You can also choose to receive personalized travel information and offers based on your travel preferences, such as route changes or service-interruption alerts.

Don't want to receive this information from us? You can opt out at any time—you're in control.

Anonymous and aggregated travel data (i.e., amassed data stripped of personal information) will be studied by TransLink to better understand, plan and forecast ridership volumes and transit service. This data will help shape better transportation for the region and provide new and better products and services in the future.

HOW YOUR PERSONAL INFORMATION MAY BE SHARED

TransLink may use other service providers to help us serve your Compass needs. To do this, we would only share your personal information with providers whose services are related to delivery and operation of the Compass program, and who meet our strict privacy and security requirements. All our service providers sign confidentiality, privacy and security agreements to protect your personal information.

We may share aggregated travel information, if requested, with municipalities and other government agencies.

NOTE: TransLink is legally obligated to share your information with law enforcement *when disclosure is required or authorized by law* and in accordance with FOIPPA requirements.

STORING YOUR PERSONAL INFORMATION

Your financial information is stored in an encrypted manner, in line with industry-standard practices. All personal information we collect and use is physically stored in, and can only be accessed from, Canada, including backup storage facilities.

HOW LONG TRANSLINK KEEPS YOUR PERSONAL INFORMATION

We'll keep your Compass Card transactions for 15 months so that, if you've registered your card, you can easily access 15-months' worth of transactions online. After 15 months, your personal information is stripped from your travel details.

Want to unregister your Compass Card? No problem—to comply with FOIPPA and to better serve you, we'll keep your personal information for two years, just in case you change your mind and want to re-register your card. Storing your data makes the process of re-registering quick and easy.

PROTECTING YOUR PERSONAL INFORMATION

TransLink uses industry-standard security technologies and procedures to protect your personal information, but you can help, too.

When you're registering your Compass Card or using the Compass website, be aware of who and what's around you. Also, make sure you use secure internet networks. TransLink can't guarantee the security of your information if you use unsecure networks.

CARD RECOVERY

Lose your card? If it's registered and turned in to TransLink, we'll be happy to let you know and return it to you. However, if an unregistered card is lost and turned in to TransLink, it will be destroyed and not reused. Unused cards returned to TransLink by Compass retailers will also be destroyed.

ACCESSING YOUR PERSONAL INFORMATION

If you've registered your card, you can easily access 15-months' worth of transactions online or by calling us and having it mailed to you. You can also see your last eight transactions at a Compass Vending Machine and your last five transactions through the automated-customer-support phone system.

And if something about your transactions doesn't seem right, please contact Compass Customer Service (604.398.2042) and let us know.

CHANGES TO THIS PRIVACY STATEMENT

TransLink may update this Statement to reflect changes in privacy laws and technology. Please check back and re-read this Statement regularly.

If we make any changes, we'll revise the "Last Updated" date in this Statement and highlight the changes. If you've registered your card, we may also email you and let you know of any updates.

QUESTIONS OR CONCERNS

If you have any questions or concerns about our privacy practices, visit translink.ca/privacypolicy or call Compass Customer Service at 604.398.2042. Our customer service representatives will be happy to help.

If you need clarification, please contact the TransLink Privacy Officer, at 778.375.7500 or privacy@translink.ca.

You can also send mail to:

TransLink Privacy Officer
400-287 Nelson's Court
New Westminster BC
V3L 0E7

If, after contacting the TransLink Privacy Officer, you still have unresolved questions, you may contact:

Office of the Information and Privacy Commission
PO Box 9038 Stn. Prov. Govt.
Victoria B.C. V8W 9A4
info@oipc.bc.ca

In this Privacy Statement, the words "we" and "our" refer to the South Coast British Columbia Transportation Authority (TransLink) along with its subsidiary operating companies including Coast Mountain Bus Company Ltd., BC Rapid Transit Company Ltd. (SkyTrain), West Coast Express Limited, and its contractors.