

INTRODUCTION

TransLink is committed to protecting personal information in accordance with [British Columbia's Freedom of Information and Protection of Privacy Act](#) ("FOIPPA"). FOIPPA defines personal information as recorded information about an identifiable individual other than [business] contact information.

The TransLink [Enterprise Privacy Policy](#) outlines the organization's general privacy practices, while this Compass Privacy Notice ("Notice") provides additional information specific to TransLink's Compass Fare Media, including Compass Cards, Compass Tickets, and Compass Wearables, as defined in the [Transit Tariff](#).

The personal information you provide via your use of the Compass system will be collected, used, and disclosed by TransLink only for purposes consistent with this Notice, the TransLink Enterprise Privacy Policy, for any other purposes as may be identified to you at the time of collection, and for such purposes as are permitted by FOIPPA.

COLLECTION OF PERSONAL INFORMATION

Personal information is only collected if you choose to register your Compass Card or if you purchase Compass Fare Media or add fare product to your Compass Card with a credit or debit card. If you do not register your Compass Card and make purchases and add fare product using only cash, you will be anonymous to TransLink.

Whether registered or not, when you use Compass Fare Media for travel, the Compass system will have a record of the Compass Fare Media's serial number and the associated travel, including the times, dates, and locations of your card reader taps, and the fares charged.

When you purchase Compass Fare Media or add fare product to a Compass Card, the Compass system will collect the location or channel through which the transaction is made, the amount of the transaction, and the date and time of the transaction. If you purchase Compass Fare Media or add fare product to your Compass Card with a credit or debit card, we will collect your payment details, including payment card number and expiry date, and, if paying online, your name, billing address, and billing phone number.

Registering your Compass Card is optional. If you choose to register your Compass Card, the information we collect during registration includes:

- Compass Card number and CVN
- Name, address, phone number, and email address
- Password and security question/answer (online only)

You will have the option to set up a 4-digit PIN for the automated Compass customer-support phone system. You will also have the option to sign-up to receive promotional email communications from Compass and TransLink.

MINORS

We encourage parents and guardians to be aware of and participate in their children's online activities. Our website is a general audience site, and TransLink does not knowingly collect personal information of children under 13 years of age. We ask that parents and guardians not allow their child to submit any personal information to us and that they register their child's Compass Card in their own name.

If you telephone Compass Customer Service, your call will be recorded for training and quality assurance. If you visit a TransLink Customer Service Centre in person, our premises operate closed circuit video ("CCTV") recording systems and you should expect that your actions will be recorded. For more information on audio and video recording, refer to [TransLink's Video Surveillance & Audio Recording Privacy Statement](#).

PROGRAM COMPASS CARDS

Program passes, such as, U-Pass BC, CNIB, and BC Bus Pass, have special criteria for program participation. To meet these criteria, we may collect your name, birth date, participant ID number and/or photograph from your program's administrator. TransLink uses this information to create program-based Compass Cards unique to each participant.

USE OF PERSONAL INFORMATION

TransLink will only use your personal information for purposes consistent with this Notice, the TransLink [Enterprise Privacy Policy](#), for any other purposes as may be identified to you at the time of collection, and for such purposes as are permitted by FOIPPA.

TransLink collects information about journeys made with Compass Fare Media in order to charge fares and to manage the Compass fare collection system. Anonymous and aggregated tap data is used to better understand and forecast ridership volumes and to support TransLink's mandate to shape and plan transit services for the region.

Whether registered or not, if you purchase Compass Fare Media or add fare product to your Compass Card with a credit or debit card, we will use the payment information provided to process and reconcile payments and refunds, and to detect and protect against fraud and error.

The information collected during Compass Card registration will be used to

- Create and manage your account
- Verify your identity to keep your information safe
- Provide you with customer services
- Administer special benefits, such as balance protection
- Deliver account-related information and updates, such as product expiries or AutoLoad confirmation
- Process and reconcile payments and refunds
- Detect and protect against fraud and error

If you opt-in to receive promotional emails, we may use your information to send you offers, updates, and announcements, such as notices about public consultations. Each promotional email we send to you includes a link or other method to quickly and easily opt-out and decline further similar emails. From time to time, we may also conduct

surveys and other market research. Participation in these surveys is entirely voluntary and you may easily decline to participate.

DISCLOSURE OF PERSONAL INFORMATION

TransLink will only disclose your personal information for purposes consistent with this Notice, the TransLink [Enterprise Privacy Policy](#), for any other purposes as may be identified to you at the time of collection, and for such purposes as are permitted by FOIPPA.

In the normal course of business, TransLink may use third party service providers to help us manage one or more facets of our business. In these instances, we share only the personal information necessary to permit fulfillment of the agreed-upon services. TransLink is responsible for ensuring that there are suitable contractual arrangements in place with our service providers so that your personal information continues to be handled and protected in a manner consistent with this Notice and TransLink's obligations under FOIPPA. For the day-to-day management and operation of the Compass system, TransLink has engaged the services of Cubic Transportation Systems, Inc.

RESPONDING TO REQUESTS FROM LAW ENFORCEMENT

In certain circumstances, TransLink may disclose personal information in response to a lawful request from police. For example, we may share personal information where there is an imminent risk of harm to an individual (e.g., missing person), which could be avoided or reduced by disclosure of the information. In all other non-emergency circumstances, we require a court order to compel release of personal information to a law enforcement agency. We have governance procedures in place to ensure that information is only disclosed in accordance with FOIPPA and the commitments made in this Notice. More information about TransLink's disclosures of Compass data to law enforcement is available on [TransLink's Privacy Transparency Report](#).

At our own initiative, TransLink may share personal information with law enforcement where we have a reasonable belief that an offence has been committed or to prevent or mitigate against fraud. For example, TransLink may choose to share information with police to investigate suspected fraud on our website.

Only anonymous and aggregated data is shared with other external parties, such as program pass administrators, developers, municipalities, and other government agencies, for their own purposes.

PROTECTION OF PERSONAL INFORMATION

TransLink uses appropriate safeguards and current security standards and procedures to protect your personal information from such risks as unauthorized access, use, disclosure, or modification. For example, these measures may include:

- Use of Secure Sockets Layer (SSL) technology on the Compass website to protect your registration and payment card information during transfer to our systems
- Encryption and storage of payment card information in accordance with industry-standard practices, such as the Payment Card Industry Data Security Standards
- Maintenance of internal policies and procedures based on "need-to-know" principles to ensure only authorized personnel have access to personal information for legitimate business purposes related to the execution of their job duties

The Compass Card contains an embedded computer chip which stores fare products (stored value and/or passes), your last 10 transactions, and a unique code that enables the correct fare to be charged. The chip does not contain any identifying information. All identifying and financial information is kept in secure "back office" systems.

Unless otherwise noted at the time of collection, all personal information is physically stored in Canada, including backup storage facilities.

SECURITY TIPS

It is important that you create a strong, unique password for your online Compass account and that you do not share your password or security answer with anyone. When registering your Compass Card or using the Compass website, be aware of your surroundings and always use secure networks. TransLink will never send you an unsolicited email asking you to provide or confirm your personal information. If you receive a suspicious email purporting to be from Compass or TransLink, do not respond to it or click on any of the links or attachments contained in the email. Please contact Compass Customer Service immediately for assistance.

RETENTION OF PERSONAL INFORMATION

TransLink retains personal information in accordance with the requirements of FOIPPA and the legal, administrative, and operational needs related to the identified purposes for collection. We maintain records management policies and retention schedules that meet these parameters. When records containing personal information are no longer reasonably necessary, we will destroy them or remove identifying information to render them anonymous.

For all Compass Fare Media, whether registered or not, transaction data is tied to the unique Compass serial number for a rolling period, up to 24 months. After that, the transaction data is disassociated from the Compass Fare Media.

If you unregister your Compass Card, your Compass Card transaction history and linkages will be removed from your account profile, but your registration information will be kept for 24 months to accommodate requests for refunds.

ACCESS TO PERSONAL INFORMATION

If you've registered your Compass Card, you can access up to 24-months' worth of transactions online or by calling Compass Customer Service to have a printout mailed to you. You can also review your last eight transactions at a Compass Vending Machine, or your last five transactions through the automated Compass customer-support phone system. If something about your transactions doesn't seem right, please contact Compass Customer Service.

You may submit, at any time, a written request for access to your personal information held by TransLink. Refer to [Freedom of Information Process](#) for more information.

MORE INFORMATION

If you have any questions or concerns about our privacy practices, you will find additional information in the TransLink [Enterprise Privacy Policy](#), or you may contact:

TransLink Privacy Officer

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

For general Compass-related inquiries, please contact Compass Customer Service at 604.398.2042.

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 for British Columbia at:

PO Box 9038, Stn. Prov. Govt.
Victoria, B.C. V8W 9A4
Telephone: 250.387.5629
Email: info@oipc.bc.ca

In this Notice, the words “we”, “our” or “TransLink” refer to the South Coast British Columbia Transportation Authority, its subsidiary operating companies (Coast Mountain Bus Company Ltd., British Columbia Rapid Transit Company Ltd., and West Coast Express Limited), and its contractors.

CHANGES TO THIS NOTICE

TransLink may update this Notice to reflect changes in our services, operations, applicable laws, or technologies. We encourage you to review this Notice regularly. If we make any changes, we'll revise the “last updated” date below and highlight the changes. If you've registered your Compass Card, we may also email you and let you know when there are any material changes to our practices.

This Notice was last updated: Sept. 23, 2022.

The retention of transaction data is increased to 24 months from 15 months to accommodate business needs, legislative requirements, and contractual obligations. Although there have been no other material changes to our practices, the wording of this Notice was updated to provide additional clarity and transparency.