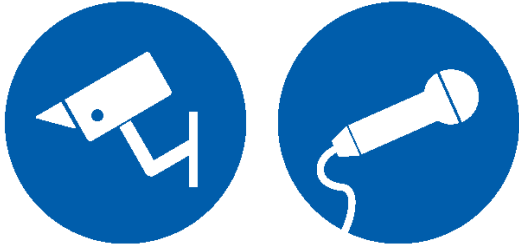


TransLink Video Surveillance & Audio Recording Privacy Statement

Last Update: August 4, 2015
Previous version: July 22, 2008



TransLink is committed to achieving a balance between an individual's right to privacy and the safety and security of its customers, employees and property. In order to achieve the safety and security mandate, Translink uses video surveillance and audio recording in public areas of the transit system in accordance with the *Freedom of Information and Protection of Privacy Act* ("FOIPPA"). Careful consideration is given, when installing and operating these systems, that we do so in a privacy sensitive manner.

TransLink's current [Enterprise Privacy Policy](#) outlines our general privacy practices. This Video Surveillance & Audio Recording Privacy Statement ("Statement") was developed to address the recording systems specifically with the collection; use and disclosure of personal information used by TransLink, its operating companies and contracted providers. Our service providers are contractually obligated to adhere to the privacy obligations of FOIPPA. This statement does not apply to covert video or audio surveillance undertaken by TransLink for law enforcement purposes.

HOW INFORMATION MAY BE COLLECTED

TransLink has found recording systems to be an effective means in the investigation and verification of incidents of crime, public or employee safety concerns and for evidentiary reasons.

All persons in public areas where recording systems are in use should expect that their actions will be recorded. This may include passenger rail operations and stations (SkyTrain & West Coast Express), bus loops and onboard vehicles, secure bicycle parking areas and public areas in TransLink buildings. Cameras are also used to collect license plate information for tolling purposes when vehicles cross TransLink-operated bridges, such as Golden Ears Bridge.

TransLink's cameras do not employ facial recognition technology.

Incoming and outgoing customer telephone interactions with Customer Information, Customer Relations, Lost Property, Compass and Access Transit call centres and Claims Department may be recorded for quality assurance and training purposes.

Where video or audio systems are normally in operation, TransLink will post privacy notices. These notices will inform individuals of the purpose(s) for the collection of information, the legal authority for doing so, and the title and contact details of the individual who can answer questions about the recording system.

HOW INFORMATION MAY BE USED

The recorded information is generally used to manage operations and for safety and security purposes. For instance, information may be used:

- to identify and prosecute individuals who engage in criminal activity;
- to identify and prosecute individuals who have acted inappropriately with respect to operational procedures, or willfully damaged TransLink property;
- to review and investigate disputes between passengers and employees;
- for training purposes;
- for the collection of tolls through an electronic toll system on bridges such as the Golden Ears Bridge; or
- in connection with claims and legal proceedings.

HOW INFORMATION MAY BE SHARED

TransLink's recorded information will only be shared, as necessary, for safety, security and operational issues involving employees, passengers, the public and TransLink property. The length of the information released will be limited to the specific duration of an incident.

The information will only be disclosed on an authorized basis, such as:

- if a request for such information complies with the legal requirements of FOIPPA;
- internally on a "need-to-know" basis;
- with proper legal authorization from government agencies such as WorkSafe BC and ICBC; or
- to the Attorney General or legal counsel for TransLink for use in civil or criminal proceedings.

Information collected for tolling purposes may be shared with other bridge toll facilities where we have interoperability agreements in place. The terms of your tolling contract provides further details on the sharing arrangement.

Any requests for access to recorded information must follow established protocols and be compliant with FOIPPA.

Individuals may request access to their personal information, if it exists, in compliance with the provisions of FOIPPA. Any other personally identifiable information, other than that of the individual requesting access, will be first eliminated from video or audio recordings. Individuals requesting access to recorded information should follow the process outlined below, under “HOW YOU CAN ACCESS YOUR INFORMATION.”

HOW LONG WE RETAIN INFORMATION

Recorded information is managed in accordance with TransLink’s Records Management Policy, which outlines the appropriate retention intervals for collected information. Under normal circumstances, video information will only be retained for approximately seven days. The information is continuously overwritten (or purged) unless an incident is identified, and the data is extracted and retained in a separate, secure storage area.

The incident-specific information may be retained longer if required. The information collected and used in tolling operations is retained for up to one year from the corresponding invoice date; it may be retained longer if required for the collection of a debt or to resolve a dispute or legal proceeding. Audio recordings may be retained up to a year in accordance with FOIPPA.

HOW WE PROTECT THE INFORMATION

TransLink has implemented administrative, physical and technical security controls to protect video or audio information. Only authorized personnel have access to and permitted to operate and/or maintain the recording systems.

The security measures include:

- transmission of information is encrypted;
- periodic reviews are conducted to account for changes in technology and ensure reasonable security measures are in place;
- storage servers are protected with role-based access rights;
- surveillance systems are calibrated to only collect the necessary information to achieve the stated purposes;
- employees who breach this Statement may be subject to discipline, up to and including dismissal; and
- any breach by a service provider of TransLink may result in the contract being terminated and the undertaking of further legal action.

HOW YOU CAN ACCESS YOUR INFORMATION

TransLink’s recorded information is subject to the access rights outlined in Part 2 of FOIPPA. We have procedures in place to manage information access requests. Requests for video records should be directed to the Manager, Information Access (translink.ca/FOI) for processing.

ACCOUNTABILITY & OVERSIGHT

TransLink's Chief Executive Officer (CEO) has overall responsibility for the management of TransLink's privacy program, including the video and audio surveillance and compliance with this Statement and FOIPPA. The CEO may delegate various responsibilities to TransLink's Privacy Officer or the Privacy Officer of the operating companies, including investigating security and/or privacy breaches and coordinating the privacy training standards.

The CEO may also delegate various responsibilities to the heads of TransLink's operating companies, including day-to-day management of their respective recording systems and ensuring that recording systems equipment and databases are stored in a safe, secure location.

WHEN WE INSTALL RECORDING SYSTEMS

Before we install a new or change an existing recording system, TransLink considers several factors including:

- the installation must be justified on the basis of verifiable, specific reports of incidents of crime, fraud or significant safety concerns;
- the surveillance will be limited in recording only those spaces that have been identified as requiring surveillance;
- the surveillance will be restricted to periods when there is a demonstrably higher likelihood of incidents occurring; and
- a Privacy Impact Assessment ("PIA") and Threat and Risk Assessment ("TRA") will be conducted and submitted to the Office of the Information & Privacy Commissioner of British Columbia ("OIPC") for feedback prior to installation.

UNAUTHORIZED ACCESS OR DISCLOSURE

All employees and contractors must adhere to this Statement and must not disclose, access, use, alter or erase any record contained in TransLink's recording systems, its components, files, or databases, without proper authorization. Any employee or contractor who becomes aware of an unauthorized access, use or disclosure in contravention of this Statement and/or a potential privacy breach shall immediately notify the Privacy Officer.

CHANGES TO THE PRIVACY STATEMENT

TransLink may occasionally update this Statement so that it remains current with changing technologies and applicable laws. We encourage you to periodically review this Statement to stay informed as to how the recording systems information is managed. If any changes are made, we will revise the "Last Update" date. TransLink may also send notifications to our registered subscribed customers via the email address provided.

QUESTIONS OR CONCERNS

If you have any questions or concerns about our privacy practices, you may refer to translink.ca/privacypolicy, contact TransLink's Privacy Officer by phone at 778-375-7500, by email at privacy@translink.ca, or regular mail at Suite 400 - 287 Nelson's Court, New Westminster, BC, V3L 0E7.

If, after contacting TransLink's Privacy Officer, your questions remain unresolved, you may contact the OIPC at PO Box 9038 Stn. Prov. Govt., Victoria BC V8W 9A4 (oipc.bc.ca).

In this Statement, "TransLink" refers to the South Coast British Columbia Transportation Authority. The words "we" and "our" refer to TransLink and its subsidiary operating companies, which include Coast Mountain Bus Company Ltd. , BC Rapid Transit Company Ltd., West Coast Express Limited and TransLink's contractors.

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, BC, V3L 0E7, attention the Transit Police Privacy Officer, by phone at (604) 515-8300, through the website transitpolice.bc.ca, or directly by email via privacy@transitpolice.bc.ca.