



## SLSMC'S PRIVACY POLICY

### About your privacy

It is the Policy of The St. Lawrence Seaway Management Corporation (SLSMC) to keep individual's Personal Information accurate, confidential, secure and private.

Personal information is defined as any information about an individual, which provides a means to identify specifically, the individual to whom it relates. The only exception would be information normally contained on a business card.

### Our ten privacy principles

The collection, use, storage, and disclosure of Personal Information under this Policy is consistent with generally accepted privacy and business practices, as well as the requirements of the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy laws.

**1. Accountability:** The Corporation is responsible for all Personal Information that it collects, uses or discloses. All of our employees are accountable for and trained to safeguard and protect the confidentiality and security of Personal Information under their care and control. The Corporation is committed to ensuring that contractors and third parties apply privacy safeguards comparable to those of the Corporation when Personal Information is being processed outside the Corporation.

**2. Identifying Purposes:** The Corporation will identify the purposes for which it collects, uses or discloses Personal information at or before the time the information is collected, unless otherwise required or prescribed by law. The Corporation may collect, use or disclose personal Information for the following purposes:

- To pass ships through a safe and reliable waterway system
- To recruit and provide an appropriate supply of well-trained employees
- To provide benefits to retired employees
- To comply with regulatory obligations with respect to safety
- To levy and collect user fees for services
- To comply with obligations to provide vessel movement data to Transport Canada, Coast Guards, SLSDC and Customs and Immigration agencies;
- To manage property and facilities, ensure environmental compliance, and perform risk management
- To permit the general public to enter contests on our Hwy H<sub>2</sub>O website
- To register delegates for the annual Hwy H<sub>2</sub>O conferences
- For all other purposes necessary to meet our customers' transportation needs

**3. Consent:** The Corporation will make a reasonable effort to make sure individuals understand how it will use the personal information collected and will obtain consent at or before it collects, uses, or discloses their Personal Information. Consent may be expressed, implied or given through an authorized representative. Where the Corporation identifies a new purpose, it will seek consent to use and or disclose Personal Information prior to using or disclosing it for that new purpose.

Individuals always have the right to withdraw consent at any time with certain exceptions and the Corporation will inform you of the implications of such withdrawal. The Corporation, however, may collect, use or disclose Personal Information without your knowledge or consent in exceptional circumstances where such collection, use or disclosure is permitted or as required by law.

**4. Limiting Collection:** The Corporation will limit its collection of Personal Information to that which is necessary for the purposes identified by the Corporation. The Corporation's staff will collect the Personal Information directly from the individual to whom the Personal Information relates wherever possible.

**5. Limiting Use, Disclosure, and Retention:** The Corporation will only use or disclose Personal Information for the purpose described and for which consent was provided, except as prescribed or required by law. Personal Information will be retained only as long as necessary to fulfill the stated purposes. Thereafter, it will be destroyed or made anonymous.

**6. Accuracy:** The Corporation will keep Personal Information accurate, complete and up to date taking into account, its use and the interest of the individual. Personal Information will be updated only when necessary to fulfil the specified purposes.

**7. Safeguards:** The Corporation will protect Personal Information with security safeguards that meet or exceed industry standards based on the sensitivity of the information. Standards may include locked filing cabinets, restricted access to offices, alarm systems, passwords, encryption, firewalls, security clearances and limiting access on a "need-to know" basis.

**8. Openness:** The Corporation is committed to being open and transparent about its Personal Information management practices. The Corporation shall make readily available to individuals, specific information about its policies and practices relating to the management of Personal Information.

**9. Individual Access:** When an individual makes a request in writing, our Privacy Officer will, within a reasonable time, advise the individual about the Personal Information the Corporation has collected about them, what it is being used for, and to whom it has been disclosed, except as otherwise prescribed or prohibited by law. An individual shall be able to challenge the accuracy and completeness of the information and request that it be amended, if appropriate.

**10. Challenging Compliance:** Individuals have the right to address any concerns, questions, suggestions or complaints concerning the Corporation's handling of their Personal Information by writing to our Privacy Officer, The St. Lawrence Seaway Management Corporation, 202 Pitt Street, Cornwall Ontario K6J 3P7.

If you are not satisfied that the Corporation is operating in compliance with the requirements of this policy you may file a written complaint with:

**THE PRIVACY COMMISSIONER OF CANADA**

112 Kent Street, Place de Ville, Tour B, 3<sup>rd</sup> Floor

Ottawa ON K1A 1H3

Tel: 1-613-995-8210

Toll free: 1-800-282-1376

Fax: 1-613-947-6850

Email: [info@privcom.gc.ca](mailto:info@privcom.gc.ca)