

Privacy Policy

Contents

Introduction (p.1)

Definitions (p.1)

The Personal Information collected and the use thereof (p.2)

Information collected automatically from Websites visitors (p.2)

Cookies (p.3)

Web analytics (p.3)

How Personal information is protected (p.4)

Disclosure and transfer of Personal Information (p.4)

Rights relative to Personal information and Complaints procedure (p.5)

Links to other sites (p.6)

Privacy Incident log and reporting (p.6)

Privacy Policy update (p.6)

Introduction

All Personal information collected, used and disclosed by the COOPÉRATIVE DE TRANSPORT MARITIME ET AÉRIEN, COOPERATIVE ASSOCIATION, including its subsidiaries (collectively hereinafter “CTMA”) is protected in accordance with the *Personal information Protection and Electronic Documents Act* and the *Act respecting the protection of Personal information in the private sector*.

Respect for the privacy and protection of Personal information of employees, suppliers, collaborators, agents, administrators, partners and customers are at the heart of the bond of trust that the CTMA wants to build with its various stakeholders.

This Privacy Policy explains the reasons why the CTMA collects Personal information, the way it uses it and the procedures followed to ensure that the privacy of any person, directly and indirectly, is protected during their business, professional, or employment relationship with the CTMA.

When communicating Personal information, whether in the context of an employment relationship, or by using one of the services offered or one of the CTMA websites, or by voluntarily interacting with CTMA agents, each person consents to the CTMA collecting, using and disclosing Personal information in accordance with this Privacy Policy, as revised from time to time. In the case of “Sensitive” Personal information, as mentioned below, consent must be confirmed in writing in accordance with Applicable Laws.

Definitions

Applicable Laws: including but not limited to the *Act respecting the protection of Personal information in the private sector*, chapter P-39.1; the *Personal information Protection and Electronic Documents Act* (S.C. 2000, c. 5) including any other law or regulation applicable in the province of Quebec and Canada.

Personal information: any information which concerns a natural person and which makes it possible, directly or indirectly, to identify him.

Sensitive Personal information: Personal information which, due to its medical, biometric or otherwise intimate nature, or because of the context in which it is used or communicated, gives rise to a high degree of reasonable expectation of privacy.

The Personal information collected and the use thereof

The CTMA collects Personal Information strictly and solely for business purposes and retains it only as long as necessary to achieve the purposes for which this information was collected and to the extent permitted or required by Applicable Laws

For example, the CTMA collects Personal information for pre-hiring analyses, occupational health and safety management, to ensure the accuracy of reservations for crossings, opening of an account, to process financial transactions, to communicate with customers in the event of changes to crossings or to respond to complaints or feedback from customers about the services offered.

In order to continuously improve the customer experience, the CTMA may request, when making reservations, authorization to include customers in a database to facilitate future reservations. CTMA may also use customer databases to conduct surveys, by telephone and through an outside company, of randomly selected customers about their experience with the CTMA.

The types of Personal information collected include names, contact information such as address, telephone numbers and email addresses, license plate numbers, credit card information and gender. Credit card information is used for billing purposes only. The credit card information processed by the computer reservation system is secured from a third party and of which the CTMA has no access to Personal information and does not maintain any records of it. When customers have special needs for their crossing, then additional Personal information may be requested. The CTMA may record calls involving, among other things, the reservations and/or customer relations departments for the purposes of verification of accuracy, performance review, training and quality assurance.

Whatever the nature of the support and the form of the collected Personal information (written, graphic, sound, visual, computerized or other), no employee, supplier, agent, administrator or collaborator of the CTMA, directly or indirectly, shall use the Personal information collected within the framework of the business relationship with the CTMA other than for the purposes of the business relationship with the CTMA while respecting the directives and procedures of the CTMA to protect Personal information thus collected.

Consent to the use and disclosure of Sensitive Personal information must be expressed in writing except as provided in the Applicable Laws. Such consent relative to the Sensitive Personal information concerning a minor under the age of fourteen (14) must be exercised by the holder of parental authority.

Information collected automatically from Websites visitors

The CTMA servers automatically log information about visits to various of its websites in the normal course of establishing and maintaining Internet connections. Such servers log statistical information such as visitor IP addresses, type of operating system, length of visits, and number of Web pages requested. They also identify categories of visitors notably by types of domains and browser types.

Subject to legal obligations, no link is made between server log information and any other data that could identify individual Website visitors. However, server logs may be reviewed for security purposes; for example, to detect intrusions into any network. Therefore, in the case of specific suspected criminal activities, it is possible that server log data that contains visitors' IP addresses may be used to trace and identify individuals. In these cases, raw data logs may be shared with law enforcement authorities and/or investigative agencies authorized to investigate such security breaches.

Cookies

Cookies are used to track how visitors use websites to determine previously visited sites and to facilitate the use of secure parts of the site. A cookie is a file that can be placed on the hard drive of the visitor to monitor the use of the site visited. Cookies are compiled into statistical information about browsing patterns and are used only to evaluate and improve the effectiveness of the sites.

The CTMA uses two (2) types of cookies:

Session Cookies: These are used as an integral part of the identification process for some of the online applications. This is done for security reasons to determine that the person identifying themselves in the CTMA systems is really that person when providing confidential information during an online session. No Personal information is stored in session cookies and they are stored only in the temporary memory (cache) of the visitor's browser. When a visitor leaves their session, the cookie is no longer valid and is deleted when the browser is closed.

Persistent Cookies: These cookies are more permanent and can be re-read when returning to the site by the same visitor as they are placed on the visitor's computer. The information they contain is written to the hard drive and remains there until the expiry date of the cookies. They are used to identify and provide personalized features and to track browsing patterns to and from the CTMA sites. For more information about such tracking, see the Web analytics section below.

Web analytics

The CTMA uses notably Google Analytics to analyze the use of its websites for the purpose of continuous improvement.

Google Analytics helps measure browsing patterns to, from and within CTMA websites. This analytical measurement tool uses session and persistent cookies to collect standard Internet log information and to track visitor behavior information in an anonymous form. The information generated by cookies about the use of websites by visitors (including the IP address, truncated to ensure anonymity) is transmitted to Google. No Personal information allowing the visitor to be identified is recorded or transmitted to Google. This anonymous information is then used to evaluate the use of the websites by visitors and to compile statistical reports on the activities on the CTMA websites. Aggregate data and statistical reports generated via Google Analytics are only used to make the CTMA websites more useful to visitors.

The CTMA may engage external service providers to effectively operate its websites, analyze aggregate data provided by Google Analytics and monitor social media on the Internet. These service providers are bound by contract to manage any Personal information they may receive in a manner consistent with the provisions of the Applicable Laws.

How Personal information is protected

Only employees or service providers with a valid reason to access and handle Personal information are authorized to do so.

For example, reservation agents collect Personal information to book a crossing and customer relations staff may have access to contact details to resolve a specific complaint. Another example, to ensure the safety of passengers, passenger manifests are generated for each ship crossing and used only by personnel requiring this information to meet safety and comfort needs.

In addition, the CTMA uses technical, physical, organizational and contractual means to protect Personal information, in particular against loss or theft, unauthorized access, communication, copying, use or modification of Personal information.

For example, when communicating with the CTMA via a booking site, the CTMA uses reliable encryption that meets industry standards to secure shared data. The CTMA also uses firewalls, a combination of hardware and software designed to separate the Internet from internal computer systems and databases. These firewalls also serve to protect computer systems against unauthorized access from the outside. The CTMA also uses an automated spam filter that protects its employees and networks against spam. Incoming email messages that are marked by the software as spam are automatically deleted by the technology without notification. Training is provided by the CTMA to its employees to make them aware of the risks of cybersecurity and the protection of Personal information.

A Privacy Officer is designated in accordance with Applicable Laws so that these are applied and complied with. The Privacy Officer must approve company policies and practices, be consulted for any privacy impact assessments and when assessing the risk of harm to an individual whose Personal information is related to a confidentiality incident and is responsible for requests for access, rectification or deletion. The General Counsel and Head of Government Affairs of the CTMA be designated as the Privacy Officer.

The Privacy Officer, in conjunction with the Chief Information Technology Manager, oversees the management, retention and destruction of Personal information throughout the lifecycle of that information.

Disclosure and transfer of Personal information

Personal information will only be used or disclosed for the specific purposes for which it is collected or as required by Applicable Laws.

For example, the CTMA must ensure the security of its websites, which includes the possibility of an investigation into attempts at unauthorized access, modification or deletion of data, the dissemination of viruses and other illegal intrusions. This may result in disclosures to law enforcement authorities and/or investigative bodies authorized to investigate such security breaches.

As part of its activities or when required by Applicable Laws, the CTMA may transfer or authorize access to Personal information to third parties located outside Quebec and/or Canada. Where applicable, the CTMA must comply with the requirements of Applicable Laws regarding the transfer of Personal information to a province or another country, such as the implementation of contractual measures.

Rights relative to Personal information and Complaints procedure

The CTMA takes the necessary measures to ensure that Personal information is accurate, complete and up to date. However, it is the responsibility of employees/users/stakeholders to provide all the information necessary for the CTMA to fulfill this obligation.

All Personal information is located at the head office and/or can be accessed from the head office of the CTMA at 435, chemin Avila-Arseneau, Cap-aux-Meules (Quebec) G4T 1J3.

Under Applicable Laws, persons who have disclosed Personal information to the CTMA, under certain conditions, have the following rights:

- Permission to access;
- Right of rectification;
- Right to withdraw consent to the processing of Personal information;
- Right to de-index, re-index and cease dissemination of Personal information.

To make a request relating to the above-mentioned rights, any person may submit a written request to the Privacy Officer, supported by proof of identity, which will only be used for the purposes of processing this request.

The CTMA will respond to any request as soon as possible, and within a maximum of thirty (30) days following the date of receipt of the request.

For information relating to the above-mentioned rights and how to exercise them, for any question relating to Personal information or to file a complaint relating to the processing of Personal information by the CTMA, any person may contact the Privacy Officer at the following address:

Privacy Officer
CTMA
435, chemin Avila-Arseneau
Cap-aux-Meules (Québec)
G4T 1J3
renseignements.personnels@ctma.ca

For assistance in submitting a request relating to the above-mentioned rights or to file a complaint, you can also contact the CTMA customer service.

To reach customer service:

1 888 986-3278 (toll-free in Canada)
418 986-3278 (local or outside Canada)

In the event of the refusal of access, the Privacy Officer shall indicate the motive of the refusal and the provisions of the law on which the refusal is based, as well as the remedies available to the applicant and the time limit within which they can be exercised. The Privacy Officer remains available to explain the motive of the refusal. By way of example, notably in the event of a dispute or if there is a risk of seriously harming a third party, the reason for the refusal will be communicated to the applicant.

In conformity with the Applicable Laws, there is also a right to file a complaint with the competent authority for the protection of Personal information.

Links to other sites

Although the CTMA takes all necessary measures to ensure that the links on its websites direct visitors to reputable and established companies, the CTMA is not responsible for the practices relating to the protection of Personal information on the websites of third parties. As such, this Privacy Policy does not extend to websites, products or services provided by third parties. The CTMA invites visitors to read and familiarize themselves with the privacy policies of these third party websites before providing any Personal information.

Privacy Incidents log and reporting

The CTMA maintains a Register of Privacy Incidents. A “Privacy Incident” means: (i) unauthorized by law access to Personal information; (ii) unauthorized by law use of Personal information; (iii) unauthorized by law disclosure of Personal information; (iv) loss of Personal information; (v) any other breach of privacy.

A report will be made to the competent authorities and to any person whose Personal information is concerned by a Privacy Incident creating a risk of serious prejudice, unless this would be likely to hinder an ongoing investigation.

If the CTMA has reason to believe that a Privacy Incident has occurred, it will take reasonable measures to reduce the risk of harm being caused and to prevent new incidents of the same nature from occurring.

Any person, witness or informed of a fact that may be considered to be a Privacy Incident, whether concrete and authentic or simply hypothetical, must contact the CTMA Privacy Officer at the following address: renseignements.personnels@ctma.ca.

Privacy Policy update

The Privacy Officer, in collaboration with the management of the CTMA, can modify this Privacy Policy at any time notably by making the new version available on the CTMA websites. Said changes, modifications, additions or repeals take effect upon issuance of a notice of modification which may be communicated by any means.

For employees, procedures specific to certain work units may be put in place from time to time to manage certain risks specific to certain tasks or certain work units.

For users of the CTMA websites, continued use of the CTMA websites constitutes: (a) acknowledgment of the terms of the Privacy Policy; and (b) agreeing to be bound by and abide by them.