

# Privacy Policy Manual

**PRI - 01**  
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## Purpose

Greater Victoria Harbour Authority (GVHA) has created this policy to ensure that we respect and uphold an individual's right to privacy and to protect their personal information. GVHA is committed to ensuring compliance with applicable Privacy Laws which set out the rules for how GVHA will collect, use, store and disclose personal information. This policy will inform individuals about how GVHA manages the collection, use, disclosure and storage of personal information. Greater Victoria Harbour Authority (GVHA) has created this policy to ensure that we respect and uphold an individual's right to privacy and to protect their personal information. GVHA is committed to ensuring compliance with applicable Privacy Laws which set out the rules for how GVHA will collect, use, store and disclose personal information. This policy will inform individuals about how GVHA manages the collection, use, disclosure and storage of personal information.

## 1. Applicable Regulations

As a federally regulated organization operating within the Transportation sector who collects, uses and/or discloses personal information of individuals across Canada, the Greater Victoria Harbour Authority ("GVHA", "we", "us" and "our") may be subject to Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"), British Columbia's Personal Information Protection Act ("BC PIPA"), Alberta's Personal Information Protection Act ("AB PIPA") and Quebec's Act Respecting the Protection of Personal Information in the Private Sector ("Quebec Act") (collectively referred to as "Privacy Laws").

## 2. Definitions

For the purposes of this policy, the following definitions apply:

- **"Personal information"** means information about an identifiable individual, including, for example, an individual's name, home address, telephone number, social insurance number, sex, income and family status. It does not include aggregate information that cannot be associated with a specific individual and it does not include information that would enable an individual to be contacted at a place of business, for example an employee's name, title, business address, or business telephone number.
- **"Customer"** is any individual or business who uses or applies to use GVHA's products, services, or facilities, including the website.
- **"Third party"** is an individual or an organization other than GVHA and the customer.

- **“Third party service provider”** means an individual or organization contracted by the GVHA to provide specific services.
- **“Employee”** means persons employed or contracted by GVHA, including volunteers.
- **“Manager”** means persons employed or contracted by GVHA who are responsible for managing or leading employee(s) of GVHA.
- **“Privacy Officer”** means a person designated by GVHA who is responsible for ensuring applicable privacy laws are adhered to within GVHA.
- **“PIPEDA”** means the Canada Protection of Personal Information and Electronic Documents Act.
- **“AB PIPA”** means the Alberta Personal Information Protection Act.
- **“BC PIPA”** means the British Columbia Personal Information Protection Act.
- **“Quebec Act”** means the Quebec Act Respecting the Protection of Personal Information in the private sector.
- **“Privacy Laws”** means the PIPEDA, AB PIPA, BC PIPA and Quebec Act, collectively.
- **“GVHA”** means the Greater Victoria Harbour Authority.

### 3. Scope

- d. This policy describes our practices with respect to the collection, use, storage and disclosure of personal information of customers and employees of GVHA. It does not apply to information collected, used, or disclosed with respect to corporate or commercial entities (including corporate or commercial entities considered “employees”).

### 4. Responsibility

- a. Employees are responsible for reviewing and complying with this policy in performing their duties and functions related to the collection, use, disclosure and storage of personal information. Employees may be subject to disciplinary actions if they knowingly or deliberately breach this policy.
- b. Managers are responsible for ensuring that this policy is made available to their direct reports.
- c. The Privacy Officer is responsible for overseeing GVHA's compliance with applicable Privacy Laws.

## 5. Policy

- a. GVHA collects personal information that is voluntarily provided by you, unless GVHA is authorized or required by law to collect your personal information from another source. This information is collected and used for the following purposes:
  - a. To invoice and process payment for the use of our products, services, and facilities. For example, we collect and use financial information to process payment for your use of our marine facilities.
  - b. To comply with legal and regulatory requirements. For example, we may collect and use personal information in response to a court order or to fulfil government reporting requirements.
  - c. To enhance safety and security. For example, we may use cameras to monitor access, egress and use of public and restricted areas.
  - d. To improve the products, services and facilities we provide. For example, we may use information voluntarily provided on customer satisfaction surveys.
  - e. To understand and respond to questions. For example, where inquiries are e-mailed to us through the “contact us” page on our web site, [www.gvha.ca](http://www.gvha.ca), we collect and use information you provide to us for the purpose of understanding your inquiry and responding to it.
  - f. For identification purposes. For example, we may require personal information such as a photograph to issue passes which enable individuals to be identified in secure or restricted areas and to obtain access to these areas.
  - g. For direct marketing purposes. For example, we may use your contact information to provide you with information about new products, services, and facilities.
  - h. To enhance your online experience. For example, we may use per-session cookies, which are data files sent to your browser and stored on your hard-drive when you visit our website. These per-session cookies track your usage on our website and can be deleted by clearing your browser history. We also use log files, which record the IP address of your computer, to track the number of hits to our website.
  - i. To provide contracted services. For example, GVHA may use a third-party service provider to assist in its operations which can include the disclosure of personal information. When we do use an outside company, we use contractual or other appropriate means to ensure that your personal information is used in a manner that is consistent with this policy.
  - j. To establish, manage or terminate an employment relationship between GVHA and an employee.
  - k. To establish, manage or terminate a contract between GVHA and a customer.
  - l. For other reasonable purposes, if you consent to the collection and use.
  - m. As otherwise authorized or required by law.

## 6. Consent

- a. Sometimes you will be asked to give your express consent, such as by checking a box to indicate your consent to receive marketing communications. Other times, we may obtain your consent implicitly when we can reasonably conclude that you have given consent by some action you have taken or an action you have decided not to take. Generally, this occurs where the purpose for use of your personal information would be reasonably apparent to you.
- b. You may refuse or withdraw consent at any time, subject to legal and contractual restrictions and reasonable notice. Refusal or withdrawal of consent may prevent GVHA from providing you with a product, service, or access to certain GVHA facilities.
- c. You may refuse or withdraw your consent by contacting us at [privacyofficer@gvha.ca](mailto:privacyofficer@gvha.ca). Our staff will explain your options and any consequences of refusing or withdrawing consent and will record your choices.

## 7. Limiting Collection

- a. We only collect the amount of personal information reasonably necessary to fulfill the purposes identified above, and do not collect personal information if other information could reasonably be collected to fulfil the identified purposes.

## 8. Limiting Use, Disclosure, and Retention

- a. We only use or disclose the amount of personal information reasonably necessary to fulfil the purposes identified above, and do not use or disclose personal information if other information could reasonably be used or disclosed to fulfil the identified purposes.
- b. Personal information is retained in accordance with GVHA retention schedules and only as long as is necessary for the fulfilment of the purposes for which it was collected, or as required by law. Personal information that is used to make a decision that directly affects you will be retained for at least one year, unless you request an earlier disposal.
- c. Residents of Quebec may request the disposal of your personal information by contacting us at [privacyofficer@gvha.ca](mailto:privacyofficer@gvha.ca). In some cases, we may be required by law to refuse to dispose of your personal information. If refusing to dispose of your personal information, we will inform you of the lawful authority for the refusal in our response.

## 9. Accuracy

- a. GVHA will make all reasonable efforts to ensure that personal information is as accurate, complete, and current as possible in order to fulfil the purpose of collection, use and/or disclosure. In some cases, GVHA relies on individuals to ensure that certain information about them, such as their home address and contact information, is current, complete, and accurate.

## 10. Storage and Safeguards

- a. GVHA will make all reasonable efforts to ensure that personal information is protected against such risks as loss, theft, unauthorized access, disclosure, copying, use, modification, or destruction. Safeguards include physical, administrative, and electronic security measures and are documented within GVHA information security policies and procedures.
- b. GVHA (as well as GVHA third party service providers) may process and store your information in or outside of Canada. GVHA will take (or will require third party service providers to take) reasonable steps to assess the privacy and security risks of processing and storing personal information outside of Canada prior to the processes or storage. If required by law, GVHA will obtain your consent for the processing and storage of your information outside of Canada.
- c. GVHA may disclose personal information to third parties for the fulfilment of any purposes identified above, or with the consent of the customer or employee.
- d. We may use third party service providers (for example, web hosting providers and/or payment processors) to manage one or more aspects of our business operations, including the processing or handling of personal information. When we do use an outside company, we use contractual or other appropriate means to ensure that your personal information is managed in a manner that is consistent with this policy.

## 11. Openness Concerning Policies and Practices

- a. GVHA will make available specific information about its policies and practices regarding the management of personal information. To contact us to obtain further information regarding our policies and practices, please refer to section 14 below.

## 12. Access and Correction

- a. Customers have the right to request access to, or correction of, their personal information under the control of GVHA. Access requests should be made, in writing, to the Privacy Officer at 100-1019 Wharf Street, Victoria BC, V8W 2Y9 or by email at [privacyofficer@gvha.ca](mailto:privacyofficer@gvha.ca). The Privacy Officer will assist customers with their access and correction requests. This includes:
  - a. identification of personal information under our custody or control;
  - b. information about how personal information is under our control may be or has been used by us; and
  - c. the names of any individuals and organizations to which the individual's personal information has been disclosed.
- b. In certain exceptional situations, further to applicable Privacy Laws, GVHA may not be able to provide access to certain personal information that it holds about an individual. Examples of where GVHA may not provide access include, but are not limited to, the following:
  - a. where provision may reveal personal information about another individual;
  - b. where provision would reveal confidential commercial information;
  - c. where the information is subject to solicitor-client privilege; or
  - d. where the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law.
- c. In certain situations, further to applicable Privacy Laws, GVHA may not be able to correct personal information that it holds about an individual. Examples of where GVHA may not be able to correct personal information include, but are not limited to, the following:
  - a. where the personal information is a professional judgement or opinion made in good faith, based on accurate information; or
  - b. where you are unable to provide sufficient evidence to suggest that the personal information contains an error or omission.
- d. GVHA will respond to access and correction requests within 30 business days, unless time extension is granted under applicable Privacy Laws.
- e. If access cannot be provided, GVHA will notify the individual making the request, in writing, of the reasons for the refusal.
- f. If GVHA refuses to correct personal information, GVHA will notify the individual of the reason for refusal and provide the individual with an opportunity to attach a written notice of disagreement to the record.
- g. If required by applicable Privacy Laws, GVHA will transmit the amended information or statement of disagreement to third parties who GVHA has disclosed the information to.

### 13. Revisions to this Privacy Policy

- a. The development of GVHA's policies and procedures for the protection of personal information is an ongoing process. Due to changes in technology and legal requirements we may revise this policy from time to time. Please ensure that you refer to the current version of GVHA's Privacy Policy. The current version will be posted on our web site at [www.gvha.ca](http://www.gvha.ca) or made available to you by writing to us at Privacy Officer, 100-1019 Wharf Street, Victoria, BC V8W 2Y9.

### 14. Questions or Concerns Regarding GVHA's Compliance

- a. Individuals may direct their general questions regarding privacy practices at GVHA, as well as any questions or concerns regarding GVHA's compliance with this policy, to the Privacy Officer at 100-1019 Wharf Street, Victoria, BC V8W 2Y9; by email at [privacyofficer@gvha.ca](mailto:privacyofficer@gvha.ca) or; phone at 1-250-383-8300.
- b. The Privacy Officer will investigate any complaints received in writing. If a complaint is found to be justified, the Privacy Officer will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A complainant will be informed, in writing, of the outcome of the investigation regarding his or her complaint.
- c. Each year the Privacy Officer will report to GVHA Board of Directors on the number, nature and disposition of complaints received in the previous year.
- d. Individuals may also have a right to submit a complaint to a Canadian privacy regulator. For more information on which privacy law applies to your concern, you may contact us at [privacyofficer@gvha.ca](mailto:privacyofficer@gvha.ca) or review the resources of applicable privacy regulators at:
  - a. Office of the Privacy Commissioner of Canada website, available at <https://www.priv.gc.ca/en/>
  - b. Office of the Information and Privacy Commissioner for British Columbia website, available at <https://www.oipc.bc.ca/>
  - c. Office of the Information and Privacy Commissioner of Alberta website, available at <https://oipc.ab.ca/>
  - d. Commission d'accès à l'information du Québec website, available at <https://www.cai.gouv.qc.ca/>

## 15. Accountability

- a. GVHA demonstrates accountability for the personal Information under its control through the:
  - a. Appointment of a Privacy Officer who is responsible for ensuring compliance with this policy and PIPEDA.
  - b. Consent policies and procedures,
- b. All of our policies and procedures are reviewed on a regular basis to ensure they reflect current practices.

The Privacy Policy will be reviewed by the Audit and Finance Committee at least once per year and revised as required.

## 16. Contact Us

Please direct any questions or requests to the Privacy Officer at:

100 – 1019 Wharf Street

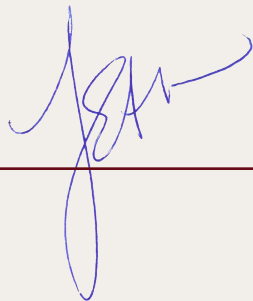
Victoria, BC V8W 2Y9;

Email: [privacyofficer@gvha.ca](mailto:privacyofficer@gvha.ca);

Phone: 1-250-383-8300

The **Privacy Policy, Revision 1** has been approved by the Chief Administrative Officer.

Approved by: \_\_\_\_\_



Date: January 21, 2026

