

# Halifax Harbour Bridges

## PRIVACY STATEMENT

*The HHB Privacy Statement was last updated October, 2020*

This website (the "Website") is owned, operated, and provided by Halifax Harbour Bridges (HHB), in conjunction with its subcontractors (collectively, "HHB"). HHB is committed to protecting the privacy of its customers and visitors, in compliance with the Nova Scotia *Freedom of Information and Protection of Privacy* (the "FOIPOP Act") and other applicable legislation.

This Privacy Statement describes the main categories of Personal Information (defined below) we collect from you, why we collect it, how we use it, and when we may share it with others. This document is not intended to describe every situation in which HHB may collect Personal Information. The purpose and authority for the collection, use and disclosure of Personal Information will be set out at the time we collection Personal Information from you.

You have choices about how you interact with HHB. By accessing, browsing, or using the Website, you acknowledge that you have read and accept this privacy statement and the [Terms of Use](#). If you do not wish to provide the Personal Information required to use the Website, you should discontinue your use of HHB websites (hdbc.ca; mymacpass.com; macpass.com) and mymacpass.com online services and call or visit the HHB Customer Service Centre.

## Personal Information We Collect

*Personal Information* means recorded information about an identifiable individual, such as an individual's name, address, email address, payment card information, telephone number, license plate number, MACPASS transponder #, travel information, MACPASS usage, personal image (e.g., surveillance footage), and other information defined as Personal Information in the FOIPOP Act. Commercial MACPASS account information and general information such as the type of web browser version used and other aggregated statistical information obtained from visit traffic on certain areas of the Website, is not considered to be Personal Information.

HHB will only collect Personal Information about you if it relates directly to, and is necessary for, an operating program or activity of HHB, or as otherwise permitted or required by law.

When we collect Personal Information from you, we will provide you with a notice that explains our legal authority to collect your Personal Information, the purpose for which the information is

being collected, and who to contact with questions. The Personal Information we collect from you is described in this section of the Privacy Statement.

## MACPASS Program

### Applying for a MACPASS

When you apply for a MACPASS online or in person, you will be asked to provide Personal Information such as your name, address, phone number, and email address so that we may contact you, your vehicle information, and payment information (pre-authorized debit, or credit card). This information is only used to register your MACPASS, process payments and ensure compliance with the MACPASS Customer Agreement.

### Crossing the Bridges

The MACPASS transponder is a small electronic device that attaches to the windshield of your vehicle and contains information that identifies your account. As you approach a toll lane, an overhead antenna identifies your MACPASS transponder and deducts the toll from your MACPASS account. It also logs the speed, date, time, bridge, and lane used. This is all considered to be your Personal Information and it is accessible to you via your mymacpass.com account or by contacting HHB directly.

### Using MACPASS Plus when parking at the Halifax Stanfield International Airport

The MACPASS plus service allows you to use your MACPASS to pay for parking at the airport. When your MACPASS plus transponder is read, the amount is deducted from your MACPASS account, and the date, time and fee is collected and logged on your account.

### Using a Macdonald Bridge emergency telephone

There are 12 emergency phones spread across the sidewalk and bike lane on the Macdonald bridge. Calls are a direct line to the operations centre at the Macdonald Bridge. These calls are not recorded. Is this clause needed in this Policy?

## HHB Law Enforcement

### HHB Bridge Patrol

HHB, through the HHB Bridge Patrol, collects Personal Information for law enforcement purposes (such as to issue a ticket for an infraction) or for the purposes of incident management (such as for accident investigation purposes and for developing incident reports). The HHB Bridge Patrol, as Special Constables appointed by the Nova Scotia Department of Justice, have the authority to issue tickets for speeding, texting, or other infractions under the NS *Motor Vehicles Act*. The HHB Bridge Patrol will collect Personal Information required by the Department of Justice Summary Offence Ticket Form A from you if you are issued a ticket for such an infraction. HHB Bridge Patrol may also collect your Personal Information if you have been involved in an incident on one of the bridges to the extent that it is necessary to document and investigate the incident.

## Video Surveillance

HHB operates video surveillance cameras across the bridges and on the HHB Bridge Patrol vehicles. This video surveillance is necessary for the security and protection of all HHB staff and visitors and security of HHB property. As such, while you are crossing the bridges or visiting our customer care centre, information identifying you, including your image, may be recorded by video surveillance cameras.

## HHB Web Cameras

HHB operates web cameras located at the on and off ramp of both bridges. The web cameras live stream footage on our [www.hdbc.ca](http://www.hdbc.ca) website so you can monitor traffic on the bridges. The web cameras are positioned in a way that attempts to limit the ability to read a license plate or identify an individual in a vehicle; however, in certain circumstances, it may be possible. HHB does not record or store web camera footage.

## Social Networks

HHB may use accounts on social networks, including Facebook, Twitter, Instagram, and others to share information with the public about bridge traffic, lane closures, maintenance progress, events, and to promote contests or other bridge-related information.

HHB's social media accounts are publicly accessible, and any posts or comments regarding HHB may be publicly visible, depending on your privacy settings. Your privacy and the retention of information on social media accounts are governed by the privacy policies of the parties that operate these social networks. Some social networks may allow you to control the information you make available to HHB and others. You are encouraged to review and agree to privacy policies and terms and conditions of use of the parties that operate these networks prior to participating. We do not have any control over such platforms and therefore, we have no responsibility or liability for the manner in which the organizations that operate such linked platforms collect, use, disclose, secure and otherwise treat your Personal Information.

HHB may collect and measure information available to us about social media activity to provide content that is relevant and potentially interesting to users of these social media platforms. If we want to use photos you have posted for use on our channels or in our publications, we will ask for your consent in advance.

## HHB Mobile App

The HHB Mobile App allows customers to receive notifications about traffic estimates on the bridges, access the bridge webcams, view information on any upcoming bridge/lane closures or construction, and obtain information about getting in touch with HHB. The app does not require users to create an account, nor does it collect Personal Information from users. HHB receives aggregate usage statistics from our third-party app developer which contains no identifying Personal Information.

## Contests and Surveys

When you choose to enter an HHB sponsored contest or participate in an HHB survey, we may collect your Personal Information. We use this information to administer the contest or survey, including contacting and announcing prize winners. At the time you enter a contest or take a survey, we may obtain your consent to send you future communications from HHB.

## Communicating with us / Customer Service

If you choose to contact us via email or direct message, we will collect and use the Personal Information you provide to contact you and respond to your inquiry.

## How We Use and Disclose Your Personal Information

We will only use or disclose your Personal Information for the purposes for which it was collected or compiled or for a compatible purpose, unless the FOIPOP Act or another law authorizes another use or disclosure of your Personal Information, or unless we obtain your express consent to use or disclose your Personal Information for another purpose.

We may be required by law to disclose your Personal Information, for example:

- to a law enforcement agency or a court if it is required to comply with a subpoena, warrant, summons, or order issued or made by a court, person, or body with jurisdiction to compel the production of information;
- to the Registry of Motor Vehicles if you are involved in an incident on a bridge;
- to the Department of Justice through the Justice Enterprise Information Network (JEIN) system; or
- for other purposes required or permitted by law.

In all cases, we will only use and disclose the minimum amount of Personal Information for the legally permitted or required purpose. We will never sell or rent your Personal Information.

## Your Privacy and the Internet

Personal Information, such as your name, phone number or email address, is not automatically gathered from you when visiting our Website. HHB only collects this type of information if you supply it to us voluntarily.

The information we gather from you automatically is described in this part of our Privacy Statement.

## Cookies

Cookies are small data files that are sent to your browser. This Website uses 'session cookies', which help you navigate between pages efficiently and generally improve your browsing experience. Session cookies disappear at the end of your session. This Website also uses

'persistent cookies' which are stored on your computer's hard drive for some length of time – they identify unique users across browsing sessions (i.e. when you close and re-open your browser), but are only used for website analytics, as described below.

Cookies do not allow us to identify individuals. You may adjust your browser settings to reject cookies if you choose. Some browsers can be set to accept all cookies, reject all cookies, or notify you when you receive cookies. If you choose to modify your browser, some pages of the Website may not function properly.

### Web Server Logs

When you access the Website, our servers collect certain information about your internet connection and your browsing experience in their logs. This includes the IP address of your internet connection and information about what you access on the Website. IP addresses are unique numbers assigned by Internet Service Providers (ISPs) to all devices used to access the Internet. The IP address, on its own, does not identify an individual. However, in certain circumstances, such as with the co-operation of an ISP, for example, it could be used to identify an individual using the site. In this context, it could be considered Personal Information, particularly when combined with other data automatically collected when a visitor requests a webpage such as the page or pages visited, date and time of the visit.

We use this information only to manage the Website. We do not attempt to use this information to identify individuals visiting the Website, unless we detect an attempt to damage or violate the site, or if a law enforcement investigation requires it. We protect and restrict access to this information.

### Website Analytics

HHB uses Google Analytics, a service provided by Google Inc., to help us understand visitor activity to improve our Website. The Google Analytics service uses cookies to generate statistical information about visits to our Website. This information is sent to Google in the United States from your computer when you visit certain HHB web pages. Google collects this information on behalf of HHB and compiles statistical reports for our use. HHB uses this non-personal data to determine opportunities for improvement (for example, understanding webpages visited provides HHB with valuable information for improving the content and functionality on certain pages). The use of Google Analytics does not allow HHB to identify individuals.

The information sent to Google includes:

- the originating Internet Protocol (IP) Address, which is anonymized by Google once collected,

- the city associated with the IP Address,
- the date and time of the request,
- the type of browser and device used,
- the page(s) visited, and
- websites that referred you to the digital service

You can opt-out of Google Analytics activity if you choose by setting your browser to notify you when a Cookie is sent, and block analytics Cookies. Please consult your browser's Help Menu for instructions. Google currently offers a free [Google Analytics opt-out tool](#) for Chrome, Internet Explorer 8-11, Safari, Firefox and Opera that will automatically set up your browser to block analytics Cookies. Visiting our Website with Google Analytics Cookies disabled will have no significant impact on your browsing experience.

For more information on Google's privacy policy, refer to the [Google Analytics Privacy Overview](#).

### Links to other Websites

This Website may include links to websites operated by other public and/or private sector organizations. HHB is not responsible for the privacy practices or content of these external websites, and this Privacy Statement does not apply to these external websites.

### Third Parties Acting on Our Behalf

HHB uses certain third parties to provide services on our behalf, such as credit card processing and mymacpass.com website hosting and support. These service providers may have access to your Personal Information to the extent that it is needed to provide the services on HHB's behalf. Each of our service providers must contractually agree to comply with HHB's privacy and security standards to perform services for HHB; however, HHB is not responsible for any failure of our service providers to comply with such standards, and HHB is not liable for any harm or damages caused by such non-compliance.

### Protection of Your Personal Information

Under the FOIPOP Act, HHB must protect your Personal Information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure, or disposal. We safeguard your Personal Information using a combination of administrative, physical, and technical controls that are appropriate given the nature of the information collected and handled by and on behalf of HHB. Any Personal Information you provide to HHB will be securely stored and transported and only accessed by those employees or agents who need to know the information to fulfill their duties.

## Inquiring About These Practices

For questions about this Privacy Statement, to inquire about how your Personal Information is handled by HHB, to ask for a copy of, or to request a correction to, your Personal Information held by HHB, you may contact HHB Privacy at [privacy@hdbc.ns.ca](mailto:privacy@hdbc.ns.ca)

## Changes to this Privacy Statement

HHB may make update this Privacy Statement at any time if we make changes to our management of this Website, to the Personal Information we collect, or to our practices for handling your Personal Information. You are encouraged to re-visit this Privacy Statement regularly to ensure your continued understanding. A record of significant changes will be maintained and made accessible through the link posted at the end of this Privacy Statement.