



COMMERCIAL IN CONFIDENCE

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# **HR Policies**

## *Privacy Policy*

FIMMS -1-01  
15 June 2020

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## 1. Preface

Federal Fleet Services Inc. (hereafter referred to as “FFS”) is committed to protecting the privacy of its employees and others who provide personal information to FFS. This Privacy Policy is designed to comply with Canada’s Personal Information Protection and Electronic Documents Act (“PIPEDA”).

## 2. Purposes of Collection of Personal Data

- a. Data collected by FFS is used for ordinary business functions, such as paying staff, contacting staff as relevant for their employment, and soliciting feedback for the purpose of improving the workplace for employees; and
- b. Personal data (such as email addresses) of applicants for employment at FFS (“applicants”) may be used to contact them for the purpose of offering employment, providing information on professional opportunities at other companies, or general information that might be reasonably expected to benefit said applicant.

## 3. Consent

- a. Employees are deemed to consent to their data being collected, used, and disclosed when employees provide FFS with information related to and necessary for the terms of their employment. This information includes their dates of birth, addresses, and bank information (for paying salaries);
- b. Applicants are deemed to implicitly consent to have their data collected and retained, and to be contacted by FFS by any medium (including telephone and email), if they apply for employment with FFS;
- c. When employees are off rotation or do not have access to FFS IT hardware (e.g. company cell phone), FFS may not be able to contact them using their FFS email addresses. Accordingly, employees must provide FFS with a means of contacting them (email and/or telephone) while they are off-rotation so that FFS can contact them regarding important business and employment matters such as travel itinerary changes; and
- d. Consent is not required for the collection or use of statistical data where information is aggregated and presented in a way that makes it impossible to



identify any individual in the data, in accordance with PIPEDA. Information may also be collected and disclosed without consent where permitted and/or required by law (for instance, if necessary for a criminal investigation).

#### **4. Limiting Collection of Data**

FFS collects data from employment applications, contracts, and by directly requesting information from its employees, for instance verbally or by email. Data is only collected where necessary for business functions and for legal compliance.

#### **5. Limiting Use, Disclosure, and Retention of Data**

- a. Personal information will only be used as necessary for normal employment functions, as stated above;
- b. FFS will not share any personal information of its employees with third parties without explicit consent, except as required by law or where consent may be reasonably implied and where third-party distribution with implicit consent is permitted by PIPEDA;
- c. For instance, FFS must share information without consent if required to do so by subpoena or Court Order, or for the purpose of complying with the Proceeds of Crime (Money Laundering) and Terrorist Financing Act. FFS will also share information in good faith, without prior explicit consent in emergency situations where consent cannot reasonably be obtained, such as in the event of a medical emergency;
- d. Personal data will be retained for the duration of the employee's employment with FFS. Data regarding any employee will be destroyed after either a) two (2) years of the end of employment of said employee or b) immediately at the end of said employee's period of employment with FFS if destruction of data is explicitly requested by the employee, except where retention is required by law; and
- e. Personal data obtained from other sources, such as applications for employment, may be deleted after two (2) years. FFS will destroy personal data if a request is made by the applicant, except where retention is required by law.

#### **6. Accuracy**



FFS strives to ensure the accuracy of its employees' information. Please send an email to [humanresources@federalfleet.ca](mailto:humanresources@federalfleet.ca) if any information changes or requires updating. FFS may periodically contact its staff to ensure all personal information on file is up to date.

## **7. Safeguard**

FFS takes the protection of sensitive data seriously. Several measures are taken to prevent the unauthorized access, alteration, theft, or disclosure of sensitive data. These include but are not limited to controlled access to physical premises, firewalls, and password restrictions on individual devices to prevent access by unauthorized persons.

## **8. Openness**

- a. This Policy will be distributed to all employees via email and/or on paper. It will also be fully accessible online on the Management Information System and on the FFS Website; and
- b. FFS may share data collected under this policy with subsidiaries or affiliated corporations, if necessary for business purposes.

## **9. Individual Access**

Employees have a right, as detailed below, to verify the accuracy of their personal information. Certain information provided to said employee for review may be redacted if it contains the information of another individual or other individuals and to release it unredacted would cause a violation of his/her/their privacy. Information will only be withheld if required by relevant statutes, such as the Evidence Act, or by judicial order.

## **10. Photography**



Marketing and public affairs efforts are extremely important for FFS, as they contribute positively to efforts to promote FFS's services. All FFS employees, including officers and crew of MV Asterix are expected to act as goodwill ambassadors of FFS. To this end, FFS employment contracts include the employee's consent to their name and title being published with or without their photograph when carrying out their duties or participating in official events. Where consent is withheld, best efforts will be made to ensure anonymity, such as blurring the faces and/or removing the names of persons withholding consent.

## **11. Complaints and Recourse**

If you have any questions or complaints about this Policy or the handling of your information, wish to withdraw consent to use your personal information, or wish to access or update any information we have about you on file, please contact:

Human Resources Director  
255 Albert St, Suite 940  
Ottawa, ON  
K1P 6A9  
613-321-3760 x 4104  
Email: [humanresources@federalfleet.ca](mailto:humanresources@federalfleet.ca)

FFS will respond to any question, complaint, or request relating to this Policy within thirty (30) days of receipt.