



INFORMATION ABOUT
YOUR PRIVACY RIGHTS

**Blue Water Bridge Authority
Currency Exchange**

June 2006

1. INTRODUCTION

As the operator of a currency exchange service, the Blue Water Bridge Authority (BWBA) recognizes the importance of achieving a delicate balance between the protection of the privacy of its clients and its legislative responsibilities as they relate to the detection and suppression of fraud, money laundering and the financing of terrorist activities. This brochure provides explanations about the personal information that we, at the BWBA Currency Exchange program, collect about you and how we handle and protect that personal information. It also explains how you can request access to your own personal information which we keep about you.

2. WE ARE COMMITTED TO PROTECTING YOUR PRIVACY

It is the policy of the BWBA to collect and handle the personal information that it requires for the operation and the administration of its Currency Exchange Program in compliance with the *Privacy Act* and the generally accepted privacy principles.

3. WHAT WE MEAN BY "COLLECTION OF PERSONAL INFORMATION"

The expression "collection of personal information" refers to all business processes and activities by which we obtain personal information about our clients. These processes and activities include the forms that we complete or ask our client to complete when performing financial and other transactions at our currency exchange counter; the handling of inquiries; the exchange of general correspondence as part of which our clients volunteer personal information about themselves or about their particular issue or situation; the photocopies that we make of the identification cards and other documents that are presented by our clients and which are kept in our customer information files; etc.

4. THE PERSONAL INFORMATION THAT WE COLLECT

Our employees are required to collect only that personal information about our clients which they absolutely need in order to perform their duties or which they are required to collect by law.

In order to account for its operations and comply with legal requirements, we collect the following elements of personal information about our clients:

- customer information log
- the client's name, surname and any other name or abbreviation that can be used to identify the client;
- the client's home and / or work addresses;
- the client's home and / or work and / or cellular telephone numbers;
- date of birth
- a photocopy of the client's prescribed ID;
- copies of cheques cashed and records of financial transactions
- general correspondence
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The information is used for the following purposes:

Customer Information Log

- To document changes and revisions made to customers personal information

Name

- To identify the client and ensure the Blue Water Bridge Authority Currency Exchange is providing the product or service to the correct person.

Address and Phone Numbers

- To contact the customer in the case of a returned item
- To meet legal and regulatory requirements such as to provide this information to FINTRAC as required under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*.

Date of Birth

- To identify the customer and ensure we are providing the product or service to the correct person
- To be able to distinguish between customers with the same or similar names
- To meet legal and regulatory requirements such as to provide this information to FINTRAC as required under the *Proceeds of crime (Money Laundering) and Terrorist Financing Act*.

Identification

- To meet legal and regulatory requirements such as to provide this information to FINTRAC as required under the *Proceeds of crime (Money Laundering) and Terrorist Financing Act*.
- To identify the customer and ensure we are providing the product or service to the correct person
- To be able to distinguish between customers with the same or similar names
- To provide proof to makers of cheques in the case of returned items sent back with a statutory declaration
- To ensure the identification presented is authentic

Occupation

- To meet legal and regulatory requirements such as to provide this information to FINTRAC as required under the *Proceeds of crime (Money Laundering) and Terrorist Financing Act*.

Records of Financial Transactions

- To meet legal and regulatory requirements such as to provide this information to FINTRAC as required under the *Proceeds of crime (Money Laundering) and Terrorist Financing Act*

General Correspondence

- To meet legal and regulatory requirements such as to provide this information to FINTRAC as required under the *Proceeds of crime (Money Laundering) and Terrorist Financing Act*

5. WHY WE COLLECT PERSONAL INFORMATION

We collect personal information mainly for the following reasons:

- In accordance with a motion that was passed at the 138th Commission Meeting, held on December 15, 1987, that the Blue Water Bridge Authority assume the operation of the Currency Exchange facility, requires that we document all the financial transactions that we perform;
- the documentation pertaining to our financial transactions also supports the accountability principle and our internal and external auditing processes, and is used to analyze and develop statistical figures regarding trends in the market and the efficiency of our operation;
- finally, the compilation of information regarding our financial transactions is in accordance with (Section 67 (a)(b)(c)(d) the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and supporting regulations.

6. HOW WE USE THE PERSONAL INFORMATION THAT WE COLLECT

We use the personal information of our clients only for the purposes that are described in this policy and in the *Info Source* publication, and our employees will only be granted access to it on a need to know basis. Should a need arise for us to use the personal information about one of our clients for a purpose that is not stated in this policy and the *Info Source* publication, we would seek consent from

the client prior to using the information for the new purpose, and we would provide all the required details about the new use in order to allow the client to give a fully informed consent.

7. HOW WE DISCLOSE THE PERSONAL INFORMATION THAT WE COLLECT

We only disclose the personal information of our clients to other parties and organizations under the following circumstances:

- with the client's fully informed consent and, in those situations, the employees of the Currency Exchange program are required to ensure that the consent is valid and that the client's consent is fully informed;
- for the purposes for which the personal information was collected or for a purpose that is consistent with that intended purpose. These disclosures occur when we process financial transaction documents, such as travellers' cheques, that contain a serial number which can be used by the originating financial institution to identify the client. Because those disclosures are for the purposes for which we initially collected the personal information, we do not usually seek the client's consent in those situations, but we do inform them at the time of the collection that their personal information will be disclosed to those parties as part of the financial transaction;
- in accordance with an Act of Parliament or with a regulation, such as the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and supporting regulations and the disclosure provisions of the *Privacy Act*. Where the disclosure is legally mandatory, we are not required to seek our clients' consent to disclose their personal information under those circumstances, but we do inform them at the time of the collection that their personal information will be disclosed to the parties who have the legal authority to receive it.

8. HOW LONG WE RETAIN THE PERSONAL INFORMATION THAT WE COLLECT

The Currency Exchange program is required to keep all the personal information that it collects during the course of financial transactions for a minimum period of seven years after the last time that it was used. That said, at the time of the drafting of this policy, the BWBA was in the process of establishing the retention period for all the personal information that is collected by the Currency Exchange

program, and once the official retention period has been approved, the period established by that schedule will become the minimum period for which we will be required to keep the personal information that we collect about our clients.

9. HOW WE PROTECT AND DISPOSE OF THE PERSONAL INFORMATION THAT WE COLLECT

We realize that the sensitive personal information that we collect about our clients deserves adequate protection against unauthorized access, modification and destruction. For this reason, we implement security measures that are consistent with the requirements of the Government of Canada Security Policy, a policy that governs the protection of the sensitive information that is kept by federal government departments and agencies across the country. Also, we have established mechanisms for the secure disposal of our clients' personal information for which we no longer have a business need, and we regularly review our security procedures to ensure that they are effective and remain up-to-date.

10. HOW TO REQUEST ACCESS TO YOUR OWN PERSONAL INFORMATION

The *Privacy Act* provides that individuals have a right to request access to the personal information that we collect about them. In line with this requirement, we have established an effective mechanism to respond to our clients' requests for access to their respective personal information within the time frames set by the *Act*. That said, our policy is to favour a simple and informal approach in handling requests from our clients, and our clients should not normally have to invoke their legal rights in order to access their personal information. In most cases, individuals are granted full access to their personal information, but it is possible that under exceptional circumstances, we may have to refuse access to some of it. Appendix 5 provides the list of the categories of personal information that can or must be refused under the *Privacy Act*.

11. COMPLAINTS AND REVIEW MECHANISMS

Individuals may complain to the Privacy Commissioner of Canada in relation to any of the matters discussed in this policy. Upon receipt of a complaint, the Privacy Commissioner will investigate the complaint and make recommendations to the BWBA as to the validity of the complaint. Complaints that pertain to the denial of access to a client's own personal information can later (after the conclusion of the investigation by the Privacy Commissioner of Canada) be

examined by the Federal Court, but complaints that pertain to the collection, use, disclosure, retention, protection and disposition of personal information can only be investigated by the Privacy Commissioner of Canada.

Here is how to reach the Office of the Privacy Commissioner of Canada:

Mailing address: 112 Kent Street
Place de Ville
Tower B, 3rd Floor
Ottawa, Ontario
K1A 1H3

Toll-free: 1-800-282-1376
Phone: (613) 995-8210
Fax: (613) 947-6850
TTY: (613) 992-9190

Web site address: www.privcom.gc.ca

We encourage our clients to contact us before lodging a complaint to the Privacy Commissioner of Canada, as this gives us an opportunity to try to resolve the matter quickly and more economically.

12. FOR MORE INFORMATION ABOUT YOUR PRIVACY RIGHTS

You can obtain more information about your privacy rights by consulting the detailed BWBA Currency Exchange Privacy Policy by contacting us:

Mail: 1 Bridge Street, Point Edward, Ontario N7V 4J5
Phone: 519-336-2720
Fax: 519-336-7622
Visiting our
Web site at: <http://www.bwba.org>.