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## I. Purpose of this Policy

The purpose of this Policy is to inform all workers and other persons attending GCT Canada Property about the use of Deltaport Intermodal Yard (DPIY) related devices on GCT Canada Property. The Policy outlines the purpose of DPIY devices and explains the nature of the specific DPIY devices, including the collection, use and disclosure of personal information related to the DPIY devices.

## II. Purposes of DPIY Devices

DPIY devices provide accurate real-time position detection of mobile equipment and personnel on GCT Canada Property. DPIY devices are primarily being used to maximize safety, security and efficiency of GCT Canada employees, customers, visitors and property, and by assisting operators and controlling equipment associated with DPIY.

DPIY devices provide operational efficiencies, safety and security benefits, through the use of a more sophisticated range of information that eliminates or reduces hazards and allows for operational efficiencies with successive layers of engineered and administrative controls.

DPIY devices are also used for the following purposes:

1. To identify the location of longshore workers, contractors, GCT personnel and any person or equipment that is entering, exiting, or on the premises of the Intermodal Yard at GCT Canada Property;
2. To monitor gate activity, traffic, and general cargo movement;
3. To visually check and obtain equipment and cargo identification data;
4. To assist operators with the safe movement of equipment and efficient cargo handling;
5. To conduct locational tracking of equipment and cargo;
6. To assist with repair and maintenance of equipment;
7. To remotely supervise GCT Canada Property and resources, including human resources, to ensure a safe and efficient operation.
8. To meet legal and regulatory requirements including the requirements set out in the *Marine Transportation Security Regulations and the Customs Sufferance Warehouse Regulations*; and,
9. To improve operational efficiencies.

Where appropriate, GCT Canada will use DPIY device information as part of disciplinary investigations including but not limited to investigations related to:

1. security breaches;
2. criminal activity including but not limited to incidents of theft or assault;
3. unsafe work practices including but not limited to incidents of tampering with safety equipment and incidents of suspected drug and alcohol use;
4. damage to employee or GCT Canada Property; or
5. a breach of the discrimination, harassment, and/or violence in the workplace provisions found in the *Canada Human Rights Act and Canada Labour Code*, or associated rules or regulations or policies.

## III. Collection, Use and Disclosure of Personal Information

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DPIY devices may directly or indirectly collect personal information as defined in the *Personal Information Protection and Electronic Documents Act (PIPEDA)* (“Personal Information”). Therefore, any camera views or locational information that GCT Canada collects for any purpose must comply with applicable privacy laws. GCT Canada will not collect, use or disclose any Personal Information collected by way of DPIY devices except for the purposes specified above and in the manner described below, unless otherwise authorized or required by law. The use of DPIY devices for these purposes has been determined after careful consideration of whether other alternatives to meeting these purposes are available. GCT Canada reserves the right to amend this Policy including with respect to additional DPIY devices that are added to DPIY from time to time.

#### **IV. DPIY Devices**

GCT Canada has carefully selected locations and DPIY device functions to collect and use the minimum Personal Information required to meet the purposes identified above. DPIY devices include those that utilize differential global navigation satellite system technology (“DGNSS”) and a tri-frequency radio transponder device (“RTD”) that applies to both personnel and equipment. The DGNSS and RTD technologies have built in redundancy to create a system that is reliable and accurate in meeting the outlined purposes. The following list of DPIY devices are currently in use at the IY.

##### RTDs (Radio Transponder Devices)

RTDs operate over wireless networks and broadcast their own signals. These are used to accurately position the real-time location of personnel and equipment within the IY. Mounted readers continuously receive signals emitted from RTDs and report the position of the RTDs back to a server. No images are captured by RTDs.

A personal RTD is battery operated and is attached to the back of a hard hat worn by all individuals in the IY. Workers and others in the IY are required to wear an RTD at all times when required to wear a hard hat and are prohibited from interfering with the technology utilized by DPIY devices. RTDs may collect locational information in relation to any activity on GCT Property where workers are wearing or in possession of a hard hat.

An equipment RTD is wired to a power source that is attached to GCT Canada equipment operating in the IY. An equipment RTD can also assist in detecting the need for and tracking repair and maintenance of equipment.

##### Cameras

A mix of fixed cameras (with and without zoom capability) and Pan-Tilt Zoom capable cameras are installed throughout the IY with some overlapping coverage to ensure maximum field of view. Software is used to operate these cameras which optimizes their utility in keeping with the purposes of this Policy.

All cameras that are used as DPIY devices are used in accordance with the GCT Canada Security Surveillance Policy.

##### Gates, Fences and Control Arms (“Gate Devices”)

Due to the highly secure operations of GCT Canada Deltaport, it is necessary to use Gate Devices to restrict access to and within various parts of the IY. Access points into the IY and between various of the secured areas within the IY are closely monitored and controlled by Gate Devices. Gate Devices are also located at either end of laneways in order to allow/bar movement down a particular lane.

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Various of these Gate Devices are accessible to personnel by means of one or more of the following which involves the real-time collection of locational information related to personnel and equipment:

- swiping of authorized identification;
- automated recognition of an RTD; or
- automated recognition using DGNSS.

Optical Character Recognition (OCR)

OCR is used at rail and gate portals in order to visually recognize containers, rail cars and tractor-trailers by means of collecting real-time locational information tied to the associated equipment or cargo. This involves capturing images of equipment and cargo.

The use of OCR provides operational control in respect of Gate Devices, traffic within the IY and general cargo inventory and movement.

The information collected by OCR may permit the collection of Personal Information based on images that are incidentally captured which could identify individuals.

Operator Viewing Devices (OVD)

OVDs provide operators of various equipment with real time monitoring of all relevant locational information about any equipment or personnel collected by any DPIY device for the purposes outlined in this Policy.

The information accessible on an OVD may permit the identification of Personal Information based on RTD or equipment assignment.

Intercoms and Audio Recording Devices

Intercoms may be used to speak with persons entering GCT Property at various access points and to speak with external personnel. Audio recordings may be made by these devices in accordance with the purposes of this Policy. Audio recordings related to monitoring maintenance of equipment are also made in respect of some equipment. Operators of such equipment are notified of audio recordings in these circumstances.

Where intercoms are used at access points to GCT Canada Property, video recordings may be made in accordance with this Policy and the GCT Canada Security Surveillance Policy.

The following is generally applicable to all DPIY devices:

1. Authorized identification may be required to access the DPIY devices to ensure that only those authorized are provided access and for the purposes as outlined. Personal Information related to such identification will be used only in a manner that is consistent with applicable legislation including *PIPEDA* and applicable rules, regulations and policies.
2. Given the 24 hour nature of GCT Canada's operations, with limited exceptions as outlined herein, at all times the DPIY devices may be engaged with respect to any part of the GCT Canada Property footprint.
3. Locational information relating to specific personnel that may be captured during authorized breaks will not be used except for purposes of emergencies and/or investigations.
4. Locational information will not be captured outside of GCT Canada Property.

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5. Review of archived (recorded) data is performed only on an as needed basis, and only for the purposes outlined above including in response to an incident of inappropriate conduct requiring investigation.
6. The information collected by any DPIY device may be accessed only as authorized by GCT management personnel on an as needed basis, and only for the purposes outlined herein.

**V. Retention, Destruction and Access**

DPIY devices provide both real time and historical information which can be obtained direct from the devices via a computer system. The data collected is securely stored on dedicated GCT Canada servers located in B.C. Unless otherwise necessary for the purposes outlined in this Policy, Personal Information collected by DPIY devices will be automatically deleted.

Information that is collected from a DPIY device that is required to be retained for investigations, proceedings or other lawful purposes or requirements will also be kept securely until such time as it is no longer necessary for such purposes. If Personal Information contained in DPIY device data is used to make a decision about an individual then the information will be kept for a period of at least one year after the decision is made.

Appropriate measures are in place to prevent unauthorized access to information collected by DPIY devices. In the event of an unauthorized access or disclosure, GCT Canada will address the matter in light of all the circumstances and in accordance with its obligations under *PIPEDA*. This may include disciplinary action.

Personal Information will be destroyed in such a manner as to ensure that no useable data is retrievable by any means.

**VI. Notification**

All areas subject to DPIY devices will be identified to individuals entering GCT Canada premises by appropriate means. Training for all those using DPIY devices will be conducted relative to their position and authorized use.

**VII. Breach of Policy**

Any breach of this policy will be subject to disciplinary action up to and including deregistration (or termination of employment where applicable). Measures included in this policy are for purposes as outlined which include protecting Personal Information and personnel safety on the job and breaches will not be tolerated.

Any employee who believes that the devices are being used inappropriately by any person and for purposes other than those intended, can submit a complaint in writing, addressed to GCT Canada.

**VII. Questions**

Anyone can contact GCT Canada at 604-267-5400 for more information about this Policy.