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I. Purpose of this Policy

The purpose of this Policy is to inform all persons attending at GCT Canada Vanterm, GCT Canada Deltaport and GCT Canada Head Office – Broadway Tech (“GCT Canada Property”) about the use of video surveillance cameras on GCT Canada Property. All authorized use of video or other image capturing equipment by anyone attending at GCT Canada Property must be conducted in accordance with this Policy.

II. Purposes of Video Surveillance

Video Security Surveillance equipment is primarily being used to monitor and protect the safety and security of GCT Canada employees, customers, visitors and property, and to deter unauthorized access, theft, other inappropriate behaviour and property damage.

Video Security Surveillance equipment is also used for the following purposes:

1. To review workplace accidents and understand the cause of injuries;
2. To assist with post-accident reviews and to assist in improving operations to avoid future accidents;
3. For operational reasons as identified herein and as related to the DPIY Devices Policy where other devices are unable to capture an area of GCT Canada Property;
4. To meet legal and regulatory requirements;
5. To improve operational efficiencies;
6. To remotely supervise GCT Canada Property and resources to ensure a safe and efficient operation; and,
7. To address any emergencies arising where there is a safety risk.

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

1. criminal activity including but not limited to incidents of theft or assault;
2. unsafe work practices including but not limited to incidents of tampering with safety equipment and incidents of suspected drug and alcohol use;
3. damage to employee or GCT Canada Property;
4. 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; or,
5. breaches of security.

III. Collection, Use and Disclosure of Personal Information

Video surveillance by its nature collects Personal Information as defined in the *Personal Information Protection and Electronic Documents Act (PIPEDA)*. Therefore, any video surveillance that GCT Canada conducts for any purpose must comply with applicable privacy laws. GCT Canada will not collect, use or disclose any Personal Information collected by way of video

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surveillance except for the purposes specified above and in the manner described below, unless otherwise authorized or required by law.

The use of video equipment 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 equipment that is added to the surveillance network from time to time.

IV. Video Surveillance System

GCT Canada has carefully selected locations and surveillance equipment system functions to collect and use the minimum Personal Information required to meet the purposes identified above. Equipment is placed in areas where there has been a history of safety/security incidents, theft and/or vandalism and in locations where there is a high risk for the same. Locations include anywhere on GCT Canada Property deemed necessary, including roadways and parking lots.

Details about the surveillance system and the monitoring of the system are as follows:

1. Given the 24 hour nature of GCT Canada's operations, with limited exceptions as outlined herein, the entire footprint of GCT Canada Property may be under surveillance at all times. The primary focus of the surveillance is on securing the site perimeter including gates, turnstiles, fence line, berths and ensuring legal and regulatory compliance.
2. The inside areas of washrooms and shower facilities are not in camera view at GCT Canada Property.
3. The cameras installed are a mix of fixed cameras (with and without zoom capability) and Pan-Tilt-Zoom (PTZ) capable cameras. No camera installed at GCT Canada Deltaport and GCT Canada Vanterm records sound.
4. Live video monitoring of the cameras is primarily conducted by GCT Canada's contracted security company (currently Westguard) in the Security Control Room. The Security Control Room has displays which are a mix of large flat-screen high-definition displays (TV's) and standard high-definition computer monitors. The room is secured by card-swipe access, and access is limited to those with security responsibilities. This monitoring is conducted 24 hours a day, 7 days per week.
5. Secondary live video monitoring may occur by way of large flat-screen high-definition displays (TV's) located in GCT Canada Vanterm's Superintendent's Office and GCT Canada Deltaport Terminal Planning Centre. These displays are primarily used for high-level operational purposes, and are run from GCT Canada-issued, password-protected, desktop computers monitored by Superintendents and/or Foremen, but may be viewed by other employees while in the area.

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6. Other live video monitoring on GCT Canada Property occurs for specific operational needs including:
 - a. Monitoring of berth face activities includes vessel loading/unloading, crane activity and berth face traffic flow. This activity is viewed by Vessel Planning staff in the Vessel Planners office. This monitoring occurs by way of large flat-screen high-definition displays (TV's) displayed from GCT Canada-issued, password-protected, desktop computers.
 - b. Monitoring of rail yard activities includes train loading/unloading, equipment activity, rail yard traffic flow and switching activities. This activity is viewed by Rail Planning staff in the Rail Planners office and GCT Canada Management, accessible by their GCT Canada-issued, password-protected computers.
 - c. Monitoring of truck gate activities including gate congestion and traffic flow. This activity is viewed by RWF Foremen (Pier, Gate and Penthouse) This activity is viewed on computer monitors connected to GCT-issued, password-protected, desktop computers.
7. Gate Devices used to restrict access to and within GCT Canada Property may be used for the purposes outlined herein and in the DPIY Devices Policy.
8. Review of archived (recorded) footage 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.
9. Intercoms may be used to speak with persons entering GCT Canada 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 and the DPIY Devices Policy.

V. Retention, Destruction and Access

Video recordings will be securely stored on dedicated GCT Canada servers located in B.C. Video recordings will be deleted automatically after 30 days unless needed for one of the purposes identified above including to investigate any incident of inappropriate conduct at the workplace.

Video recordings that are required to be retained for investigations, proceedings or other lawful purposes or requirements will also be kept securely until such time as they are no longer necessary for such purposes. If Personal Information contained in a video recording is used to make a decision about an individual then the recording will be kept for a period of at least one year after the decision is made.

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Access to video recordings will be limited to GCT Canada Contracted Security personnel, GCT Safety and Security Department staff, GCT Management and to other persons as required for the purposes outlined above.

Appropriate measures are in place to prevent unauthorized access to video recordings. 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 video surveillance are identified by way of signage. Signs will be posted in appropriate areas, either at the entrance to the area under surveillance, or in close proximity to the security camera.

VII. Questions

Anyone can contact GCT Canada at 604-267-5200 more information about GCT Canada’s video surveillance system.