

PRESTO Privacy Policy

PRESTO understands that maintaining the privacy of your personal information is important to you. In order to meet its commitment to your privacy and obligations under the Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. F.31 ("FIPPA"), PRESTO has developed and will adhere to this Privacy Policy relating to the collection, use and disclosure by PRESTO of your personal information in connection with your use of the PRESTO Card. Capitalized terms used in this Privacy Policy but not defined herein shall have the meaning given to such terms as set out in the terms and conditions for the PRESTO Card or the Website terms and conditions posted on the PRESTO Website on which this Privacy Policy appears.

Accountability

- The Metrolinx Coordinator for Freedom of Information and Protection of Privacy has been designated by PRESTO as the individual accountable for compliance in accordance with this Privacy Policy and FIPPA.
- All correspondence to PRESTO in accordance with this Privacy Policy and FIPPA shall be:
 - a. in writing;
 - b. accompany a fee of \$5.00 made to the order of Metrolinx (FOI requests only); and
 - c. specify in satisfactory detail the nature of the matter at issue or the information that is being requested.
- Correspondence may be submitted to the attention of:

Coordinator, Freedom of Information and Protection of Privacy
Metrolinx
277 Front Street West
Toronto, ON M5V 2X4

Personal Information

- Personal information that may be collected by PRESTO in connection with your use of the PRESTO Services (including the PRESTO Card) is recorded information that identifies individuals and may include:
- All correspondence to PRESTO in accordance with this Privacy Policy and FIPPA shall be:
 - a. information relating to financial transactions in which you have been involved or will be involved with PRESTO, including your credit card number and your bank account information;
 - b. any identifying number, symbol or other particular identifier assigned to you by PRESTO;
 - c. your address or telephone number;

- d. correspondence sent to PRESTO by you that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence; and/or
 - e. your name where it appears with other personal information relating to you or where the disclosure of your name would reveal other personal information about you.
- In connection with the PRESTO Services to be provided, personal information may be collected by PRESTO from you. As well, PRESTO may collect information about you through your use of the PRESTO Card.
- PRESTO limits the amount and type of personal information collected from you to only the personal information that is required for the purposes outlined below, or the purposes identified to you when PRESTO requests your personal information. PRESTO will not use your personal information for any other purpose without first obtaining your consent.
- PRESTO's primary purpose for collecting your personal information is to provide the services and/or products requested by you. In addition, you agree that your personal information may be used, among other things, to:
 - a. open and set-up your PRESTO Account;
 - b. verify your identity and/or your eligibility for certain PRESTO Services;
 - c. mail to you your PRESTO Card and other such items or communications;
 - d. operate the PRESTO Services effectively;
 - e. administer loyalty programs associated with the use of the PRESTO Services;
 - f. protect you and PRESTO from error and fraud;
 - g. better understand your needs and eligibility for products and services offered by PRESTO or the Service Providers;
 - h. communicate, and provide to you those products and services that may be of interest to you;
 - i. improve the products and/or services offered to you; and
 - j. comply with legal and regulatory requirements.

Consent

- Your consent to PRESTO's collection, use and/or disclosure of your personal information in accordance with this Privacy Policy and FIPPA may be obtained from you expressly or impliedly. Express consent may be obtained orally or in writing. Implied consent may be obtained based on some action you have taken, or an action you decided not to take, which action or inaction could reasonably be considered by PRESTO as evidencing your consent.
- You have the right at any time to withdraw your consent by providing written notice to PRESTO, provided that there are no legal requirements to prevent this. However, if you withdraw your consent, you may no longer be eligible to use or be provided with some or all of the PRESTO Services, including use of the PRESTO Card.

Limiting Collection

- In accordance with FIPPA, the collection of your personal information by PRESTO is limited to that which is necessary for the purposes identified herein. All personal information is collected by PRESTO in a fair and lawful manner.

Limiting Use, Disclosure

- PRESTO shall only use or disclose your personal information in accordance with FIPPA. PRESTO will not, without your consent, sell or trade to, or share with any third party, your personal information for purposes other than those for which it was collected or for a purpose consistent with such purposes.
- However, you agree that PRESTO may disclose your personal information to third parties without your further consent in circumstances where:
 - a. PRESTO has received your previous consent to such disclosure, including for the purposes set out in this Privacy Policy;
 - b. disclosure to a third party is necessary in order to provide services to you;
 - c. it is required or permitted by law or pursuant to a court order;
 - d. PRESTO sells or transfers its business to a third party or restructures; or
 - e. disclosure is reasonably required to a bona fide third party potential investor of PRESTO;

Disclosures in response to an official request

- Under FIPPA, in certain circumstances, Metrolinx may share personal information of its PRESTO customers in response to a reasonable request from a police officer, special constable, or transit safety officer ("officers"). In such circumstances, Metrolinx may choose to share information without requiring a warrant or court order. These circumstances include:
 - a. where there are immediate and compelling concerns about an individual's health or safety, such as a lost or missing person, and there appears to be no other way for the official to obtain the requested information in a timely manner;
 - b. in an emergency, to facilitate contact with a spouse or relative, such as where a person has been injured or is ill, and where the delay in providing the information could be harmful to someone's health or safety; or
 - c. where a PRESTO transit operator is investigating a safety or security incident, such as theft, vandalism, assault or other offence, on or in relation to the transit operator's property or services.

Disclosures at Metrolinx's own initiative

- At its own initiative, Metrolinx may share personal information with a police officer, special constable, or transit safety officer where Metrolinx has a reasonable basis to believe that an offence has occurred on its property.
- In such cases, Metrolinx will limit the amount of information it discloses to what is relevant and necessary relating to the specific offence.

Disclosures in response to a court order or other legal requirement

- In other circumstances, Metrolinx will generally require a court order such as a warrant or production order. This would include circumstances where:
 - a. the incident giving rise to the request is not related to Metrolinx's property or services;
 - b. the request relates to information for multiple cards or accounts;

- c. the request relates to information over several weeks or more; or
 - d. the request relates to financial information
- In addition, Metrolinx may be expressly required to disclose personal information pursuant to a federal or provincial law.
- All such requests will be reviewed by Metrolinx's Privacy Office. Metrolinx will also notify individuals that their information has been disclosed in cases relating to their individual health or safety, such as a lost or missing person request. In all other cases, Metrolinx will notify individuals that their information has been disclosed where law enforcement has authorized us to do so.

Accuracy and Individual Access

- You may request access to your personal information at any time.
- PRESTO will act in accordance with FIPPA in providing you with a complete accounting of your personal information contained in PRESTO's records. However, there may be circumstances where PRESTO is unable to provide all such information to you, such as, for example, if your records:
 - i. contain references to other persons;
 - ii. are subject to legal privilege;
 - iii. contain confidential information proprietary to PRESTO or another person (including, without limitation, proprietary information of any Service Providers);
 - iv. relate to an investigation regarding a breach of any agreement with PRESTO or any of its affiliates or contravention of laws; or
 - v. cannot be disclosed for any other legal reason. PRESTO endeavours to keep your personal information as accurate, complete and up-to-date as possible.
- If you wish to verify, update, remove or amend your personal information in our records, please notify PRESTO in writing as set out above.
- If an individual successfully demonstrates the inaccuracy or incompleteness of personal information, PRESTO shall amend the information as required.
- Depending upon the nature of the information challenged, amendment may involve the correction, deletion, or addition of information. Where appropriate, the amended information shall be transmitted to third parties having access to the information in question.

Use of Web Technologies and Cookies

- Cookies are generally used to make it more convenient for users to move around the PRESTO Website. If you choose, cookies may be used to 'remember' certain personal information, such as your password, in order to make it easier and faster to log-in and navigate the PRESTO Website. These types of cookies need to be stored on your computer's hard drive. Cookies used by PRESTO are encrypted to make the information in cookies unreadable to anyone except PRESTO.
- Prestocard.ca uses a number of third party products in order to collect anonymous information that helps us serve our customers. Read their statements to find out how your information may be used.
 - a. Google Analytics provides us with anonymous information, numbers, and statistics to help us understand how our website can perform better and

improve your experience. [See the Google Analytics privacy statement.](#)

- b. Firebase is Google's mobile application development platform that provides us with tools for tracking analytics, reporting/fixing app crashes, creating marketing and product experiments. [See Firebase Privacy and Security for more details.](#)
- c. reCAPTCHA is used to protect our website from hackers, spam and abuse. reCAPTCHA is subject to the [privacy policy and terms of use.](#)
- d. Microsoft Copilot is used to support our online chat feature. [See the Microsoft Copilot Transparency Note.](#)
- e. Moneris is the system that we use to let you make secure payments directly from our website. [See the Moneris Payment Provider privacy statement.](#)
- f. Google Play Store provides us with your device ID, device model and operating system to help us better troubleshoot any issues you may have and improve your experience. [See the Google Play privacy statement.](#)

Safeguards and Retention

- All personal information collected by PRESTO will be protected by using appropriate and necessary safeguards under FIPPA against loss, theft and unauthorized access, disclosure, copying, use or modification.
- The methods of protection may include:
 - a. use of personal identification numbers to access your PRESTO Account information on the PRESTO Website;
 - b. technological measures, for example, the use of passwords and encryption technology;
 - c. physical measures, for example, locked filing cabinets and restricted access to offices; and
 - d. agreements between PRESTO and any of its third party service providers which require that any information provided by PRESTO to them must be maintained in confidence.
- PRESTO retains your personal information for only as long as it is required for the purposes set out in this Privacy Policy or as required by law or to respond to any issue which may arise at a later time.
- PRESTO will act in accordance with the requirements under FIPPA to destroy, delete or erase your personal information from its records when it is no longer required.
- There may however be circumstances where PRESTO may not be able to completely remove your personal information, including as a result of data backup procedures or document retention policies. In these circumstances such information will continue to be safeguarded.

Openness and Compliance

- If you have any questions regarding this Privacy Policy or PRESTO's privacy practices or if you believe that PRESTO is not complying with the terms of this Privacy Policy or FIPPA, please contact Metrolinx's Privacy Office:

Senior Privacy Officer
Metrolinx
97 Front Street West, 2nd Floor
Toronto, ON M5J 1E6
416-202-5941

Metrolinx will investigate all complaints. If a complaint is found to be justified, Metrolinx and PRESTO shall take appropriate measures, including, if necessary, amending its policies and practices.

- PRESTO is committed to disclosing information relating to its policies, practices and management in accordance with FIPPA. To make a freedom of information request, please contact Metrolinx's Freedom of Information Office:

Coordinator, Freedom of Information and Protection of Privacy
Metrolinx
277 Front Street West
Toronto, ON M5V 2X4
416-202-7382

Metrolinx will investigate all complaints. If a complaint is found to be justified, Metrolinx and PRESTO shall take appropriate measures, including, if necessary, amending its policies and practices.