

Protecting your privacy

What information we collect and why



MANITOBA
PUBLIC INSURANCE

Protecting Your Privacy

We're committed to protecting your privacy by keeping your personal information and your personal health information accurate, confidential and secure.

The Freedom of Information and Protection of Privacy Act (FIPPA), The Personal Health Information Act (PHIA) and The Drivers and Vehicles Act (DVA) set the rules for how we and our Autopac agents may collect, use and share your information, and how it must be safeguarded. These statutes also set out your rights to:

- request access to your own information
- ensure your information is kept private

If you have any questions or require access to information, our contact information is available on page 11.

Personal information and personal health information

What is personal information?

Personal information is recorded information about you, including your name, home address, home telephone or fax number, age, gender and any identifying number such as your driver's licence number. It also includes electronic scans of your signature and photo.

What is personal health information?

Personal health information is recorded information about your health or health care, or payment for your health care. This includes your Personal Health Identification Number (PHIN).

Why do we collect this information?

For driver licensing and vehicle registration, we collect this information to:

- administer driver licensing and vehicle registration programs
- decide if your health prevents you from driving safely
- decide if you qualify medically for a certain class of driver's licence
- monitor the performances of drivers, vehicle inspection stations, dealers, salespersons, recyclers, driving schools and driver trainers

For our insurance programs, including claims handling and underwriting, we collect this information to:

- establish and maintain communication with our customers
- underwrite risks properly
- investigate and pay personal injury and property damage claims
- prevent and detect fraud
- offer and provide products and services to our customers
- conduct surveys and research and compile statistics, to help us deliver better products and service to our customers
- comply with the law
- conduct business or other activities as permitted or required by law
- help enforce the law
- perform any other activity necessary to achieve any of the above

From whom do we collect personal health information?

Under the DVA, physicians and optometrists must notify us if a medical condition is adversely affecting your ability to drive safely. If the Registrar of Motor Vehicles requires you to provide a medical report, you must provide it.

We also collect personal health information from individuals and health care professionals for the purposes listed above.

Retention, storage and destruction of information

We keep your information only for as long as we need it:

- to administer products and services
- to meet any legal, regulatory or tax requirements
- for a reasonable time thereafter

We store your photo and signature on a separate Manitoba Public Insurance database on its own secure server. Only specially-trained and security-checked staff have access to this database.

When we no longer need your information, we destroy it carefully to prevent accidental disclosure to unauthorized parties.

Can I access my driver file, driver record or vehicle records?

Yes, you can access your own information.

Your driver file contains all the information about you that we've collected since you were first licensed. One of our employees can review your file with you and explain what is included in the record. You can also get copies of your personal health information.

Your driver record (or abstract) contains your personal driver information and a history of your driving record. Vehicle records contain vehicle history, vehicle status and verification of ownership. Copies of these records are available for a \$10 charge.

You may have to request access in writing and supply proof of identity. Due to privacy and security concerns, we don't accept requests for personal information or personal health information submitted via the Internet or email. Our staff may accept inquiries by phone at their discretion, provided they can confirm the caller's identity.

With a few exceptions, we won't disclose the information contained in these records to another individual or organization without your written consent. (See page 6 for details.)

Will I receive access to all of my information, or to every kind of record I might request?

No. The law prohibits you from accessing certain information.

For example, if your records include information about others, we'll withhold that information to protect their privacy. This allows us to disclose as much information as possible while respecting the privacy rights of others.

Also, under Manitoba law, you may not be able to access information in your record that others have given to us in confidence. Again, this is to protect their privacy.

How do I access my records?

We have search policies, based on FIPPA and PHIA, that guide how we disclose information.

If we deny your request for access to personal information, you can file a formal Application for Access under FIPPA with us. A FIPPA application does not replace existing procedures for accessing other records or information that is normally available to the public. You may be able to get the information you want without making a formal application under FIPPA. So, before submitting your FIPPA application form, please check with us first.

Where do you get a FIPPA application form?

Forms are available at any provincial government office. They are also available at gov.mb.ca/fippa/appforms.html

How much do I have to pay to access my records?

A \$10 charge applies for each driver and vehicle record that is available to the public. There is no charge to examine your driver file. There is no initial fee for accessing records under FIPPA. However, fees may apply to requests for a large volume of records or to requests requiring more than two hours for us to respond. In these cases, we'll let you know the cost of responding to your request. Please remember that we can refuse to provide information under FIPPA if it is already publicly available.

Does anyone else have access to my information?

Only our employees who need your information to provide a driver or vehicle service or to manage one of our programs may access it. Our adjusters are able to access driver's licence and vehicle registration information required to handle claims. If we're considering any other uses of your information, we'll ask you beforehand for your written consent.

In most cases, you must give us written permission before we can disclose your information to another person or organization. However, under Manitoba's privacy legislation and the DVA, there are some situations in which we can disclose your information without your consent.



With whom and for what reasons can we share your information without your consent?

Without your consent, we can share your information with:

- law enforcement agencies, government departments and agencies, and municipalities, for enforcing the law or preventing crime
- Manitoba Justice, for use in a prosecution or for collecting outstanding fines
- other departments within Manitoba Public Insurance, for administering our driver licensing and vehicle registration programs and our insurance programs
- federal, provincial and municipal governments and agencies, for collecting monies owed to them
- various Manitoba government departments and agencies, for determining eligibility for programs and services, and for investigating fraud
- The Addictions Foundation of Manitoba, for supporting its Driver and Vehicle Licensing Alcohol and Drug program
- Transport Canada, for administering the Canadian Vehicle Survey
- Elections Canada, for administering and updating the National Register of Electors
- other licensing jurisdictions, for administering the Interprovincial Record Exchange System
- traffic authorities, as defined in *The Highway Traffic Act*, for managing traffic/parking programs
- service providers that deliver a program or service to, or on behalf of, Manitoba Public Insurance

We occasionally share information with researchers whose research could help promote road safety. In each case, we enter into a formal review process and a written agreement with the researcher to protect your information.

We also share your information with the War Amps. Manitoba has a formal agreement with the War Amps to provide the names and addresses of licensed Manitoba drivers each year. This helps them provide a valuable public service.

You can request that your name be removed from the War Amps list by sending Manitoba Public Insurance a written request. See the contact information on page 11.

You can also have your name removed from the War Amps mailing list by contacting them directly at:

The War Amps
Key Tag Service
1 Maybrook Drive
Scarborough, ON M1V 5K9
Toll-free: 1-800-250-3030
Fax: 1-800-219-8988

What if I believe that my privacy rights are being violated?

First, contact our Privacy, Information & Corporate Access Officer. The Officer will review your concerns and try to resolve them. If you are dissatisfied with the results, or with the process as it relates to administrative fairness, you may raise the issue with Manitoba's Ombudsman.

The Manitoba Ombudsman is an independent officer of the Legislative Assembly, who assists people and public sector organizations with their concerns by conducting impartial investigations, making recommendations and providing guidance to ensure people are treated in a consistent, fair and reasonable manner and that their rights to information and privacy are protected. The Ombudsman is not an appeal body and cannot substitute their opinion for that of the Corporation. They do not have the power to overturn decisions. In its investigations, the Ombudsman identifies problems with a particular process, decision or systemic issue and may make recommendations to the Corporation to address the issue.

Contact the Manitoba Ombudsman at:

750-500 Portage Avenue

Winnipeg, MB R3C 3X1

Phone: 204-982-9130

Toll free: 1-800-665-0531

Fax: 204-942-7803

Email: ombudsman@ombudsman.mb.ca

For more information, visit ombudsman.mb.ca.

What is the facial recognition system?

Facial recognition technology helps us to prevent people from obtaining more than one driver's licence or identification card, or from assuming someone else's identity. Manitoba Public Insurance and our Autopac agents adhere to information and privacy protection laws when handling your information.

When you apply for a Manitoba driver's licence or identification card, you are photographed. Facial recognition technology is then used to measure the specific characteristics of your face and create a mathematical equation. This mathematical equation is part of your personal information.

The system then compares your equation to others in the database. Only specially-trained and security-checked staff have access to this database. All of your information is transmitted to our secure database through an encrypted secure connection. None of this information is retained, copied or stored by the Autopac agent.

How can I use a Manitoba Health Card to prove my residency?

If you are under 18 years of age, your parent or legal guardian's Manitoba Health card can be used as proof of your Manitoba residency, provided you are listed on the back as a dependant.

In some instances, a Manitoba Health card will contain information about another individual. If this is the case, the Autopac agent or Manitoba Public Insurance customer service representative will photocopy the entire Manitoba Health card and return the original to you. The photocopy will be electronically scanned and transmitted through a secure encrypted connection to Manitoba Public Insurance, where personal information that does not belong to you will be blacked out before the information is stored. The photocopy will then be given to you.

The same process will be followed for any other documents containing third party personal information or personal health information.

Contact Information

To discuss a concern about the collection and handling of your personal information, to review your own information held in our care, or to find out if you need to file a FIPPA application, contact:

Manitoba Public Insurance
Privacy, Information & Corporate Access Officer
702-234 Donald Street
Box 6300
Winnipeg, MB R3C 4A4
Phone: 204-985-8770 ext. 7384
Fax: 204-942-2217

To request vehicle history information, or to have your name removed from the War Amps list, contact:

Manitoba Public Insurance
Vehicle Registration Information
Box 6300
Winnipeg, MB R3C 4A4
Phone: 204-985-1999
Fax: 204-953-4999

You can request driving records, including a driver abstract and a claims experience letter. Visit the *Request a driving record* page at mpi.mb.ca for full information, including the application form and applicable fees.

This brochure provides general information about Manitoba's privacy legislation and our privacy policies and practices.

For more information about FIPPA, visit gov.mb.ca/fippa/index.html.

More information about PHIA is available at gov.mb.ca/health/phia.

For more information about the Manitoba Ombudsman and the complaint process under FIPPA and PHIA, visit ombudsman.mb.ca.

More information about DVA is available at gov.mb.ca/laws/index.php.

For information about our programs and services, visit mpi.mb.ca.

This pamphlet is for informational purposes only. Where there is an inconsistency between the pamphlet and the law, the law shall prevail.



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