

PRIVACY POLICY

MTW Traffic Inc.

Effective Date: January 1, 2026 | Last Updated: March 2026

1. Introduction

MTW Traffic Inc. ("MTW Traffic", "we", "us", or "our") is a licensed traffic control service provider operating in Ontario, Canada. We are committed to protecting the privacy of our clients, employees, subcontractors, and all individuals whose personal information we handle in the course of our business operations.

This Privacy Policy describes how MTW Traffic collects, uses, stores, discloses, and protects personal information, including information gathered through our MTW Traffic Reports Portal (the "Portal"). We comply with the Personal Information Protection and Electronic Documents Act (PIPEDA), the Ontario Freedom of Information and Protection of Privacy Act (FIPPA), and all other applicable Canadian privacy legislation.

By engaging our services, using our Portal, or providing us with your personal information, you consent to the practices described in this Privacy Policy.

2. Scope of This Policy

This Privacy Policy applies to:

- Clients and their authorized representatives who engage MTW Traffic for traffic control services
- Personnel (employees, flaggers, supervisors, and subcontractors) of MTW Traffic
- Visitors to our website and registered users of the MTW Traffic Reports Portal
- Members of the public whose information may be incidentally collected in the course of traffic control operations

This policy does not apply to third-party websites, services, or entities linked from our Portal, whose privacy practices are governed by their own policies.

3. Information We Collect

3.1 Client and Project Information

When you engage MTW Traffic for traffic control services, we collect information including:

- Business name, contact names, addresses, phone numbers, and email addresses
 - Project site addresses, permit numbers, and Ministry of Transportation (MTO) permit data
 - Contract details, scope of work, and billing information
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- Emergency contact information for job sites

3.2 Personnel Information

For our employees and subcontractors, we collect:

- Full legal name, date of birth, and government-issued ID details
- Traffic Control Person (TCP) certification numbers and expiry dates
- Ontario driver's licence information where applicable
- Emergency contact details, health and safety training records
- Payroll information, banking details, and tax documentation (SIN where required)
- Incident reports, near-miss documentation, and disciplinary records

3.3 Operational and Site Data

In the normal course of providing traffic control services, we may collect and record:

- Dates, times, and duration of traffic control deployments
- Site photographs and video recordings for safety documentation and incident reporting
- Traffic control plans (TCPs) and site inspection reports
- Incident, injury, or property damage reports involving third parties

3.4 MTW Traffic Reports Portal Data

When clients and authorized users access the MTW Traffic Reports Portal, we automatically collect:

- Login credentials (username, hashed password)
- IP addresses, browser type, device identifiers, and session timestamps
- Access logs, page views, and actions performed within the Portal
- Documents uploaded, downloaded, or generated through the Portal
- Communications and support requests submitted through the Portal

4. How We Use Your Information

MTW Traffic uses personal information for the following purposes:

- Delivering traffic control services and fulfilling contractual obligations
- Verifying TCP certifications, licences, and compliance with Ontario Regulation 104/97 and the Occupational Health and Safety Act
- Preparing, issuing, and processing invoices and payments
- Conducting safety audits, incident investigations, and WSIB reporting
- Providing clients with access to project documentation through the MTW Traffic Reports Portal
- Communicating with clients, subcontractors, and regulatory bodies about ongoing or completed projects
- Maintaining employment and HR records as required by Ontario law
- Improving our services, training programs, and internal processes
- Complying with legal obligations, responding to regulatory inquiries, and defending legal claims

5. MTW Traffic Reports Portal — Data Privacy & Retention

5.1 Portal Overview

The MTW Traffic Reports Portal is a secure, web-based platform that allows authorized clients and project managers to view, download, and manage traffic control documentation including daily reports, TCPs, site photos, certifications, and invoicing records. Access to the Portal is granted on a per-project or per-account basis.

5.2 Data Stored in the Portal

The following categories of data may be stored within the Portal:

- Daily Traffic Control Reports generated by MTW supervisors and TCPs
- Site photographs and video thumbnails associated with active and completed projects
- Traffic Control Plans (TCPs) and layout diagrams
- Personnel certification records (TCP cards, first aid, WHMIS)
- Client-specific project files, correspondence, and permit documents
- Portal user activity logs and audit trails

5.3 Access Controls

Access to Portal data is strictly controlled. Client users may only access data associated with their own projects and accounts. Administrative access is limited to authorized MTW Traffic personnel on a need-to-know basis. All Portal sessions are encrypted using TLS (Transport Layer Security), and multi-factor authentication (MFA) is recommended for all user accounts.

MTW Traffic does not sell, share, or disclose Portal data to any third party without the express written consent of the account holder, except where required by law or regulatory authority.

5.4 Data Retention Schedule

MTW Traffic retains data stored in the Portal in accordance with the following schedule:

Active Project Data: Retained for the duration of the project and for a period of 7 years following project completion, in compliance with Ontario construction lien limitation periods and WSIB audit requirements.

Daily Traffic Control Reports: Retained for a minimum of 7 years. Reports associated with incidents or claims will be retained for the duration of any related legal proceedings plus an additional 2 years.

Site Photographs and Video: Retained for 3 years following project completion, or 7 years if associated with an incident, near-miss, property damage, or insurance claim.

Personnel Certification Records: Retained for 5 years following the end of the employment or subcontractor relationship, or the expiry of relevant certifications.

Portal User Account Data: Account information is retained for 2 years following the last login or project activity. Dormant accounts will be flagged for review and deactivated after 12 consecutive months of inactivity.

Audit Logs & Access Records: Portal access logs are retained for 3 years to support security investigations and compliance reviews.

5.5 Data Deletion

Upon expiry of the applicable retention period, personal information is securely deleted or anonymized in accordance with industry-standard data destruction practices. Clients may request early deletion of their project data by contacting MTW Traffic in writing; however, deletion may be restricted where records are required for legal, regulatory, or WSIB compliance purposes.

5.6 Data Breach Notification

In the unlikely event of an unauthorized access, loss, or disclosure of personal information held in the Portal, MTW Traffic will notify affected individuals and, where required, the Office of the Privacy Commissioner of Canada (OPC) in accordance with PIPEDA's Breach of Security Safeguards Regulations. Notification will be made as expeditiously as possible and no later than required under applicable law.

6. Disclosure of Personal Information

MTW Traffic does not sell personal information. We may share information in the following limited circumstances:

- With our trusted service providers (e.g., payroll processors, cloud hosting providers) who are bound by confidentiality obligations and PIPEDA-compliant data processing agreements
- With clients, solely in relation to their own projects and personnel deployed on their sites
- With the Ministry of Transportation of Ontario (MTO), WSIB, or other regulatory bodies as required by law
- With law enforcement or courts in response to valid legal process, court orders, or government requests
- In connection with a business transaction such as a merger or acquisition, with confidentiality protections in place

7. Security Safeguards

MTW Traffic implements administrative, physical, and technical safeguards appropriate to the sensitivity of the personal information we hold. These measures include:

- TLS encryption for all data transmitted through the Portal and our website
- Encrypted storage of sensitive data at rest using AES-256 or equivalent standards
- Role-based access controls limiting Portal access to authorized individuals only
- Regular security assessments and vulnerability testing of Portal infrastructure
- Employee training on privacy obligations and data handling best practices
- Locked physical storage for hard-copy records containing personal information

No system is completely secure, and MTW Traffic cannot guarantee the absolute security of information transmitted over the internet. We encourage all Portal users to use strong, unique passwords and to report any suspicious activity to us immediately.

8. Your Privacy Rights

Subject to applicable law, individuals whose personal information is held by MTW Traffic have the right to:

- Request access to their personal information held by MTW Traffic
- Request correction of inaccurate or incomplete information
- Withdraw consent to the collection or use of personal information (subject to legal and contractual limitations)
- Request an explanation of how their information has been used or disclosed
- Lodge a complaint with the Office of the Privacy Commissioner of Canada (OPC) if they believe their privacy rights have been violated

To exercise any of these rights, please contact our Privacy Officer using the contact information provided in Section 11 below. MTW Traffic will respond to access and correction requests within 30 days as required by PIPEDA.

9. Cookies and Online Tracking

The MTW Traffic Reports Portal and company website use cookies and similar technologies to maintain session security. The following type of cookies may be used:

- Essential Cookies: Required for Portal login sessions and security functions. These cannot be disabled, and are not used for analytics purposes.

We do not use cookies for cross-site advertising or tracking. For more information on managing cookies, refer to your browser's help documentation.

10. Changes to This Privacy Policy

MTW Traffic may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or Portal functionality. The updated policy will be posted on our website and within the Portal with a revised effective date. We encourage clients and Portal users to review this policy periodically. Continued use of our services or the Portal following an update constitutes acceptance of the revised policy.

11. Government & Client Contract Obligations

When MTW Traffic Inc. operates under contracts with government agencies, Crown corporations, municipalities, or other clients with elevated security and confidentiality requirements, additional privacy and data-handling obligations apply. MTW Traffic is committed to meeting these requirements across all engagements, whether at the federal, provincial, or municipal level, or with private-sector clients who impose equivalent standards.

11.1 Personnel Security Screening

Where required by a client or contracting authority, all MTW Traffic personnel and recurring subcontractors assigned to a project may be required to undergo security screening appropriate to the nature of the engagement. Depending on the client's requirements, this may include:

- Submission of personnel security screening documentation to the client or designated security authority
- Criminal record checks, including electronic fingerprinting where required by the contracting authority
- Compliance with client-specific access control requirements, including the right of the client to deny site access to individuals who do not meet required clearance levels

MTW Traffic will not permit unscreened personnel to access restricted or sensitive areas where security screening has been stipulated as a condition of contract. All site access requirements will be coordinated with the designated security authority of the contracting organization.

11.2 Security Representative

Where required by the contracting authority, MTW Traffic designates a Security Representative who serves as the primary point of contact for security coordination. This individual is responsible for:

- Liaising with the client's security team to facilitate personnel screening and access authorization
- Ensuring that only appropriately screened individuals are granted access to sensitive information, assets, or project sites on a need-to-know basis
- Safeguarding all client-owned information and assets entrusted to MTW Traffic or its subcontractors
- Preparing and submitting security incident or breach reports to the appropriate authority promptly upon occurrence
- Coordinating the return of all client records, photographs, documents, site plans, and related materials upon contract conclusion or upon request

11.3 Confidentiality of Client and Project Information

All project-related information collected, generated, or received by MTW Traffic in connection with any client engagement is treated as strictly confidential. Specifically:

- MTW Traffic employees and subcontractors are prohibited from discussing, disclosing, or sharing project information — including operational details, site layouts, security provisions, or design content — with any unauthorized party
- All copies of project documentation and site materials created or distributed in connection with a client contract must be returned or securely destroyed upon contract conclusion, as directed by the client
- Client-owned records, equipment data, and operational information are treated as the property of the client at all times

11.4 Intellectual Property and Work Product

Where stipulated by a client contract, all materials, reports, traffic control plans, photographs, data, and other deliverables prepared by MTW Traffic in the course of performing contracted services may vest in the client as intellectual property. MTW Traffic will comply with any assignment of copyright or waiver of moral rights required under applicable contract terms and

the Copyright Act (R.S.C. 1985, c. C-42). MTW Traffic will not use, copy, or publish client work product except as strictly necessary to perform the contracted services.

11.5 Access to Information and Government Disclosure

MTW Traffic acknowledges that certain clients — including federal and provincial Crown corporations, municipalities, and public bodies — may be subject to access to information or freedom of information legislation, including the Access to Information Act (Canada) and the Freedom of Information and Protection of Privacy Act (Ontario). Information submitted by MTW Traffic in connection with government contracts, including bids, reports, and correspondence, may be subject to disclosure pursuant to a lawful request under applicable legislation. MTW Traffic accepts this as a condition of doing business with public-sector clients.

11.6 Incident Reporting

MTW Traffic is committed to timely incident reporting in accordance with all client contract requirements. In the absence of client-specific timelines, MTW Traffic's standard reporting protocol is:

- Urgent incidents (public safety emergencies, property damage, or security breaches): reported to the client within 1 hour of occurrence
- Non-urgent incidents: reported within 24 hours of occurrence via written report
- Suspected data or security breaches: reported immediately to the appropriate client security contact and, where required by law, to the Office of the Privacy Commissioner of Canada

Incident reports may contain personal information about members of the public, emergency responders, or third parties. Such information is collected solely for operational and reporting purposes and is handled in accordance with PIPEDA and the terms of the applicable client contract.

12. Contacting us

For questions, concerns, or requests relating to this Privacy Policy or the handling of your personal information, please contact:

MTW Traffic Inc.

Email: info@mtwservices.com

Phone: (613) 668-2215