

# Privacy Policy

Last Updated: April 20, 2026 | Southern Ontario, Canada

Compliant with: PIPEDA | FIPPA (Ontario) | MFIPPA (Ontario) | OHS / MOL | ESA Electronic Monitoring Provisions

## 1. INTRODUCTION

SafeOnSite ("we", "our", or "us") operates an AI-powered construction site safety management platform based in Southern Ontario, Canada. Our system uses on-site local edge AI technology to analyze RTSP (Real-Time Streaming Protocol) camera feeds, detect safety violations in real time, issue alerts to site management, and maintain compliance logs.

We are committed to protecting the privacy of all individuals whose information is collected through our platform, including construction workers, site supervisors, and management personnel.

**Governing Legislation:** This Privacy Policy is governed by and compliant with PIPEDA, FIPPA (R.S.O. 1990, c. F.31), MFIPPA (R.S.O. 1990, c. M.56), Ontario's OHS administered by the MLTSD, and PHIPA where applicable.

## 2. SCOPE AND APPLICATION

This policy applies to:

- Construction workers and contractors captured by on-site camera systems
- Site supervisors, safety officers, and management users of the platform
- Visitors and personnel present on monitored construction sites
- Organizations and employers who deploy SafeOnSite on their worksites

## 3. INFORMATION WE COLLECT

### 3.1 Video and AI-Analyzed Data (Edge AI Processing)

SafeOnSite processes live RTSP camera feeds using on-site local edge AI hardware. The following data is generated and/or retained:

- Real-time video streams analyzed locally on-site (not transmitted to the cloud unless explicitly configured)
- AI-generated safety violation events (e.g., missing PPE, restricted zone entry, fall hazards)
- Timestamped incident logs and alert records
- Anonymized or identifiable still frames associated with detected violations, depending on configuration

**Important:** Video feeds are processed locally on edge devices. Raw video is NOT stored long-term unless configured by the site operator. Only violation event data and associated metadata are retained in logs.

### 3.2 Personal Information of Platform Users

- Full name, job title, and role
- Email address and phone number
- Employer/organization name and worksite location
- Account credentials and login activity/audit logs

### 3.3 Worker and Site Personnel Data

- Worker identification (where applicable, e.g., badge numbers — subject to separate consent)
- Safety compliance records and violation history
- Incident reports and corrective action records

### 3.4 Technical and Device Data

- IP addresses of connected devices
- Edge device identifiers and firmware versions
- Camera feed metadata (location, timestamp, resolution)
- System performance and diagnostic logs

## 4. LEGAL BASIS FOR COLLECTION AND USE

Legislation	Key Obligation
<b>PIPEDA</b>	Collect, use, and disclose personal information only with knowledge and consent; identify purpose before or at time of collection.
<b>FIPPA / MFIPPA</b>	For public institution deployments: collection only under statutory authority or where directly necessary for a lawful program. Notice required under s.39(2) FIPPA / s.29(2) MFIPPA.
<b>ESA / Working for Workers Four Act, 2023</b>	Employers must provide written notice to employees regarding electronic monitoring (AI video analysis), including nature, purpose, and use of collected information.

## 5. HOW WE USE YOUR INFORMATION

- Detect and alert on real-time safety violations on construction sites
- Generate and maintain safety compliance logs as required under the OHSA
- Provide site management dashboards and reporting tools
- Investigate incidents and support corrective action processes
- Fulfill obligations under Ontario's OHSA and O. Reg. 213/91 (Construction Projects)
- Improve AI model accuracy using anonymized, aggregated data only
- Respond to support requests and manage user accounts
- Comply with legal and regulatory obligations

We do NOT use personal information for marketing profiling or sell data to third parties.

## 6. VIDEO SURVEILLANCE AND AI PROCESSING

### 6.1 Edge AI Architecture

All video analysis is performed locally on on-site edge AI hardware. Raw video streams are not transmitted to external servers during normal operation. This architecture is designed to minimize privacy exposure and comply with data minimization principles under PIPEDA.

### 6.2 Retention of Violation Records

Timestamped violation logs and associated event data are retained for a minimum of 12 months (configurable) to support OHSA compliance, Ministry of Labour inspections, incident investigations, and internal safety audits.

### 6.3 Signage Requirements

Employers deploying SafeOnSite are responsible for posting clear and visible signage at all monitored site entrances notifying workers and visitors that AI-assisted video surveillance is in operation, in accordance with applicable privacy legislation and OHSA requirements.

## 7. DISCLOSURE OF PERSONAL INFORMATION

### 7.1 Within Your Organization

Authorized site managers, safety officers, and administrators within your organization may access violation logs, alerts, and associated data.

### 7.2 Ministry of Labour (MLTSD)

SafeOnSite supports disclosure of safety records to Ontario Ministry of Labour inspectors and investigators as required under the OHSA (s.54), including incident logs, violation records, and safety compliance documentation.

### 7.3 Law Enforcement and Legal Proceedings

We may disclose information where required by law, court order, or to protect the safety of individuals on site.

### 7.4 Service Providers

We engage trusted third-party service providers under data processing agreements that require them to protect personal information in accordance with PIPEDA and applicable Ontario privacy law.

### 7.5 Business Transfers

In the event of a merger or acquisition, personal information may be transferred subject to equivalent privacy protections. **We do NOT sell personal information.**

## 8. DATA RETENTION

Data Type	Retention Period
Violation event logs	Minimum 12 months (configurable; longer recommended for OHSA compliance)
User account data	Duration of account plus 2 years post-closure

Raw video footage (if retained)	Maximum 30 days unless required for active investigation
Incident investigation records	7 years, consistent with OHSA requirements

## 9. DATA SECURITY

SafeOnSite implements the following safeguards consistent with PIPEDA's security requirements:

- On-site edge processing to minimize data transmission risk
- AES-256 encryption for stored violation logs and event data
- TLS encryption for all data transmitted between edge devices and management dashboards
- Role-based access controls with audit logging
- Physical security requirements for edge AI hardware (provided in deployment guidelines)
- Regular security assessments and software updates

## 10. YOUR RIGHTS UNDER PIPEDA AND FIPPA/MFIPPA

Individuals have the right to:

- Be informed of the existence, use, and disclosure of their personal information
- Request access to their personal information (subject to exemptions under FIPPA/MFIPPA)
- Request correction of inaccurate personal information
- Challenge compliance with this policy and applicable privacy legislation
- File a complaint with the Office of the Information and Privacy Commissioner of Ontario (IPC): [www.ipc.on.ca](http://www.ipc.on.ca)
- File a complaint with the Office of the Privacy Commissioner of Canada (OPC): [www.priv.gc.ca](http://www.priv.gc.ca)

To exercise your rights, contact our Privacy Officer at: [privacy@safeonsite.com](mailto:privacy@safeonsite.com)

## 11. CROSS-BORDER DATA TRANSFERS

SafeOnSite's edge AI architecture is designed to keep data on-site within Canada. Where cloud services are used (e.g., remote dashboard access, backup), data may be processed in jurisdictions outside Canada. In such cases, we ensure contractual protections equivalent to PIPEDA are in place and disclose this to clients prior to deployment.

## 12. CHILDREN AND VULNERABLE PERSONS

SafeOnSite is intended for use in professional construction environments. We do not knowingly collect personal information from individuals under 18 years of age.

## 13. CHANGES TO THIS POLICY

We will notify users of material changes to this policy via email and platform notification with a minimum of 30 days' notice before changes take effect.

## 14. CONTACT AND COMPLAINTS

<b>Privacy Officer:</b>	SafeOnSite
<b>Email:</b>	<a href="mailto:privacy@safeonsite.com">privacy@safeonsite.com</a>
<b>Website:</b>	<a href="http://www.safeonsite.com">www.safeonsite.com</a>
<b>Region:</b>	Southern Ontario, Canada
<b>Ontario IPC:</b>	<a href="http://www.ipc.on.ca">www.ipc.on.ca</a>   1-800-387-0073
<b>Federal OPC:</b>	<a href="http://www.priv.gc.ca">www.priv.gc.ca</a>   1-800-282-1376

---

This document was prepared for SafeOnSite and is intended for informational purposes. It does not constitute legal advice. Consult a qualified privacy or legal professional for advice specific to your situation.