

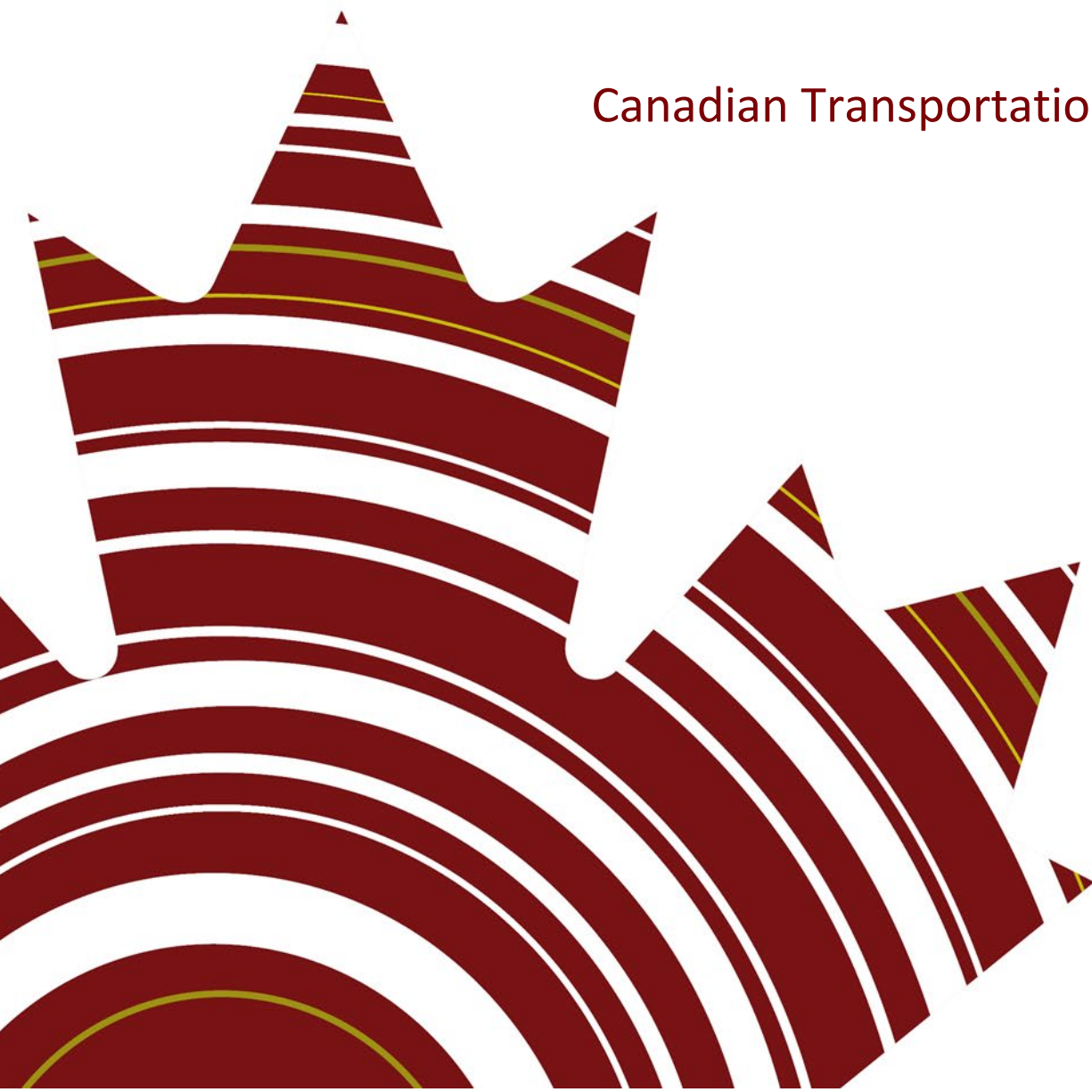


Canadian
Transportation
Agency

Office
des transports
du Canada

Protecting your personal information during adjudication: A guide for air passengers

Canadian Transportation Agency



Canada 

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Summary

- Air passengers whose complaint against an airline is moving to adjudication are responsible for protecting their personal information. If you don't take steps to do this, **your personal details could become public information.**
- You should always **remove unneeded personal information** from your complaint documents. It's personal if it identifies you as an individual.
- **Leave in** your name, address, phone number, and email. **Take out** any other personal details, unless they are important to your complaint. **Always** take out credit card and bank account numbers!
- You can use editing tools to hide details in electronic documents. First, make a copy of them to work with. For paper documents, cover the details, for example with paper or sticky notes, and make a copy. Never alter your originals.
- If a personal detail is important to your complaint, leave it in, but ask us permission to keep it confidential.
- If the airline sends documents about your complaint, check them for your personal details. If you see any, highlight them for us and ask us to remove them.

Disclaimer

This is not a legal document. The explanations and definitions in this guide are for general guidance purposes only. Legal requirements and protections concerning personal information are set out in the [Privacy Act](#) and [Access to Information Act](#).

In case of differences between this guide and legislation or regulations, the legislation or regulations prevail.

Introduction

This is a guide for people who have complained about an airline, and now the complaint is moving to the adjudication stage. The guide explains how to protect your personal information as you move to, and go through, adjudication.

Going to adjudication is like going to court, except usually you don't appear in person. You give your side of the complaint, and the airline gives its side, in emails and other documents. Anyone can ask to see these emails and documents, just like they could ask to see items from a court case.

This is one way that adjudication is different from other complaint stages. In the other stages, information you give us stays private. But once you move to adjudication, other people could ask to see it -- even if it includes things like your credit card or passport details.

To protect yourself, you should remove personal details from any documents you send us. Or, if you must leave them in, you can ask us to keep them confidential. This guide explains how. It covers:

- What personal information is;
- When and how to remove personal information (with step-by-step examples);
- How to request confidentiality for information you must leave in; and
- Checking documents the airline sends us for **your** personal information.

Is your complaint about accessibility?

If your complaint is about air travel accessibility for persons with disabilities, we have specific guides and help on our [Accessible Transportation](#) page.

What is personal information?

Information is personal if it can identify you as an individual.

Basic personal information includes your name, address, phone number, and email.

Other personal information includes your banking details, government identification (ID) numbers, and details about your background. Examples include:

Banking and government ID:

- Credit card or bank account number
- Passport number/Permanent resident card number
- Driver's license number
- Health card number
- Social insurance number

Background details:

- Age or date of birth
- Medical history or information about your health
- Race or colour
- National or ethnic origin
- Religion
- Marital status
- Education or employment history
- Criminal history

What personal information should I remove? What should I leave in?

In order to process your complaint, we require your name, address, phone number, and email. We keep this basic information in our files and share it with the airline. We do not offer it to anyone else, but it is available to the public if someone asks for it.

Other than the basic information, you can (and should!) remove most personal information from your documents. Only leave it in if it's important to your case. You could **ask yourself**:

- Does this information help explain my complaint?
- Would someone need this information to make a decision in my case?

If the answer is no, remove the information from your documents before you send it to us. Don't mark or cut your originals – as needed, make a copy and work from that.

For electronic copies, digital photos, and scans, you can use photo editing software or a redaction app to black out or remove the information. There may be free tools online.

For paper documents, you can completely cover the words you want to hide using paper or sticky notes (or, on copies only, a black marker or black tape). Then scan or take a picture of the document.

You can send us the electronic copies, scans, screenshots, or photos of your document in many formats. We accept pdf, doc, docx, xls, xlsx, jpg, jpeg, png, gif, and txt. Include the most recent case number we gave you each time you contact us with or about your documents.

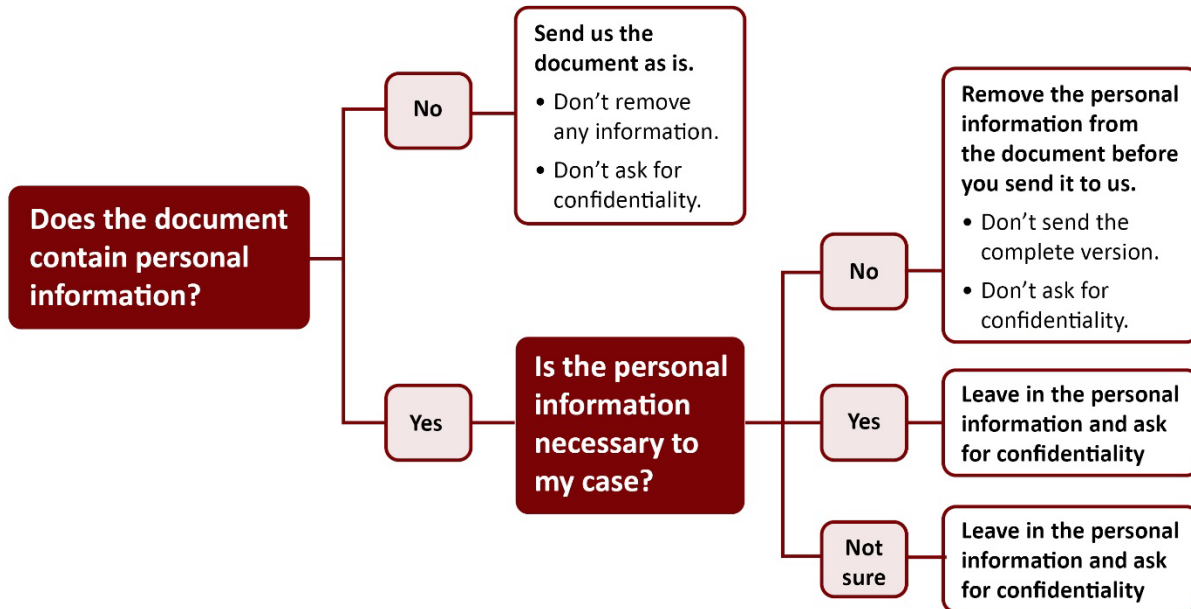
Keep the original versions

Keep original paper documents (like passports) safe. For electronic documents (like e-tickets, booking confirmations, and invoices), save a copy before removing or hiding any information.

If the answer is yes, you should leave the information in. However, you can ask us to keep it confidential. Annex A explains how to request confidentiality.

If you're not sure whether the personal information is important to your case, it's best to leave it in and ask for confidentiality.

Here is another view of the questions to ask yourself:



Remember: if you don't take these steps to protect your personal information, it may become public information.

Step-by-step examples of removing information from documents

Below are two examples of removing personal information from documents. In each example, a passenger has a complaint about an airline and the complaint is moving to the adjudication stage.

Example 1 – Passport

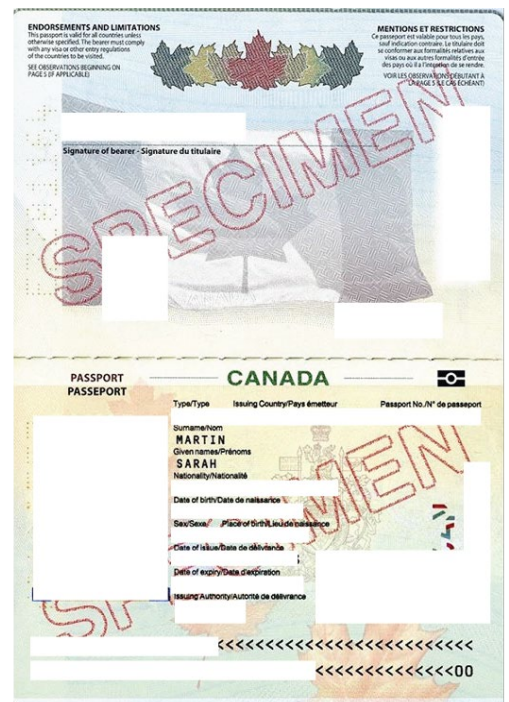
The passenger claims the airline didn't let them on the flight because their name was misspelled on the ticket. The passenger wants to send us a copy of their main passport pages to support their complaint.

The passport pages show a lot of personal information. They show the passenger's name, picture, nationality, date of birth, place of birth, sex, and passport number.

The passenger looks at the passport pages to decide what to leave in and what to remove. They decide:

- Their name is basic information. Also, their complaint is about the spelling of the name, which is **important** to the case. They leave the name in.
- Their picture, nationality, date of birth, place of birth, sex, and passport number are **not important** to the case. The passenger removes these parts by covering them with paper and taking a photograph.

The passenger sends us the photo of the passport pages. It shows their name, but not the other personal information.



Example 2 – Credit Card Statement

The passenger claims the airline charged them to check a bag that was supposed to be free. The passenger wants to send us a copy of their credit card statement to support their complaint. The statement shows the checked bag payment.

The statement also shows other information. It shows the passenger's name, credit card number, and various things they've bought. It shows their credit limit, how much they paid on their credit card last month, and how much they owe this month.

The passenger looks at the credit card statement to decide what to leave in and what to remove. They decide:

- Their name is basic information. They leave their name in.
- The part of the statement that shows the checked bag payment is **important** to the case. The passenger leaves that part in.
- The passenger's credit card number, past purchases and payments, credit limit, and the total amount they owe this month are **not important** to the case. The passenger removes this information using black marker on a copy of the statement.

The passenger sends us a scan of the credit card statement. It only shows their name and the checked bag payment.

(Photo of a credit card statement – TO BE ADDED LATER)

We never need your credit card or bank account numbers. You should always remove these from documents you send us about your complaint.

Checking documents the airline sends for your personal information

Once you request to move to adjudication and send us the documents that support your complaint, we assess whether to accept your case. If it is accepted, the adjudication begins.

We email you and the airline a letter to let you know the process has started and explain the next steps. The letter also gives you a new case number and explains how to contact us during the adjudication, if you need to. Whenever you contact us, you should include your case number.

At this point, the airline may send us comments and documents about your complaint. This is called their "answer to the complaint", where they give their side of the story. Any time the airline sends a document to us, they must also send it to you. You will have copies of all the information they provide and they will have copies of all the information you provide.

- You should always check documents the airline sends for your personal information.
- If the documents contain your passport number, date of birth, or other personal information that is not important to your case, let us know. You can send us a copy with the personal information highlighted. We will remove it from the documents.

You should not remove information from the airline's documents yourself. Just highlight it on a copy for us, and we will remove it.

We're here to help

If you've read this guide but still have questions, we can help! Contact the person at our agency who has been helping you with your complaint. Include your case number.

To learn about protecting your personal information in other situations, visit this [page of tips](#).

Annex A: How to ask for confidentiality

If you must leave personal information in documents you send us for your complaint, you can ask us not to make it public. This is called asking for confidentiality.

This annex explains:

- what it means for information to be "confidential"
- how to ask for confidentiality
- the different decisions that could be made when you ask us for confidentiality.

Always ask for confidentiality for personal information that you must leave in documents. Otherwise, your personal details will be publicly available.

What "confidential" means

For air passengers, keeping your information confidential means we see it and the airline sees it, but no one else. (Usually, the airline already has the information, because you provided it when you bought your ticket.)

How to ask for confidentiality

To ask for confidentiality as your complaint moves to adjudication, take Steps 1 and 2, below. If you ask for confidentiality after your adjudication starts, you must also take Step 3.

Steps 1 and 2

1. Fill out the [form for asking for confidentiality](#) (also called Form 17).

- Clearly say why making the information public would harm you or someone else. Be as specific as you can about why it would be harmful.

2. Send us the completed Form 17 and these **two** copies of the document:

- One copy in which the personal information is **highlighted**. Each page should say "CONTAINS CONFIDENTIAL INFORMATION" at the top, in capital letters.
- One copy in which the personal information is **blacked out**.

Step 3

If you ask for confidentiality at any time **after** your adjudication starts, you must take steps 1 and 2 above and step 3 below. You'll know when your adjudication starts, because we send you a letter about it.

3. Send a copy of Form 17 and the two copies of your document to the airline.

- Send them to the airline the same day you send them to us, before 5 PM Eastern Time.
- Copy us on your email to the airline. Use our contact information from the letter we send you when your adjudication starts. Include the case number from that letter.

The decision

When you ask for confidentiality, our decision-makers do not automatically agree. They think carefully about your request. They look at how important the personal information is to your case, and if they decide it is important, they look at how harmful it would be to share it. Here's what they could decide:

Not important to the case: Decision-makers could find that the information you want to keep confidential is not important to your case. If so, they won't accept your confidentiality request, but they only use the blacked-out version of your document. The public will not have access to the blacked-out information.

Harmful: The decision-makers could find that the information is important and that sharing it will harm you or someone else. If so, the airline would have access to the blacked-out information in your document, but the public would not. The decision-makers could also take other steps related to your document, which they would explain.

Not harmful: The decision-makers could find that the information is important, but that sharing it with the public (if someone asks for it) won't harm you or anyone else. Or, they could find that the benefits of sharing outweigh the harm. In this situation, your information would be available to the public on request.

Note

If the airline has any concerns about your confidentiality request, they could object to it. If that happens, you have a chance to reply to their objection.