EMPLOYEE PRIVACY POLICY

Approved by: Alan Hartslief, Chief Financial Officer and Paula Breeze, Chief Human Resources Officer

28 June 2023

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1. Purpose

CEDA is committed to protecting the privacy of our employees and balancing an employee's right to privacy with CEDA's need to use personal information to manage our business effectively. This is achieved by telling you what information we require from you, how this information will be used and handled, how this information will be kept safe and with whom this information will be shared.

The purpose of the CEDA Employee Privacy Policy (the "**Policy**") is to advise of:

- CEDA information handling practices.
- Security measures in place designed to protect your Personal Information.
- Employee's role in controlling your Personal Information.

This Policy is intended to comply with the applicable federal and provincial privacy legislation in all of the provinces in which CEDA operates. This Policy outlines the requirements under the applicable privacy legislation and industry regulations which apply to personal information in any form, whether oral, electronic or written.

2. Scope

This policy is applicable to all CEDA Employees and Contractors.

In the union context, if this Policy contradicts a provision of the applicable collective agreement dealing with privacy issues, the collective agreement shall prevail. If a collective agreement is silent, this Policy shall apply.

3. Accountabilities

The following are the various accountabilities within CEDA in respect of this Policy.

3.1 Operational, Functional and Frontline Leaders

- Educating and explaining to all employees and/or contractors the contents of this Policy.
- Being familiar with, understanding and complying with this Policy.
- Leading by example.

3.2 Human Resources

- Promoting all applicable client and legislative codes, regulations and practices/procedures.
- Working with operational and functional leaders to help ensure all employees are aware of this Policy.
- From time to time, providing training to all employees to aid in the application and understanding of this Policy.

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3.3 Employees and/or Contractors

- Understanding, being familiar with, and complying with this Policy.
- Adhering to all applicable CEDA, client and legislative codes, regulations and practices/procedures.
- Leading by example.

4. Definitions and Acronyms

CEDA means CEDA Limited Partnership and its subsidiaries and affiliated entities.

CEDA Business means all work-related activities engaged in by Employees and Contractors during work hours while working in a remote location, on CEDA or customer premises, participating in company-related social activities, in public while representing CEDA, or operating any vehicles leased or owned by CEDA in conjunction with these activities.

Contractor means any individual working as an independent contractor or subcontractor to CEDA providing services to CEDA or on behalf of CEDA.

Employee means any individual employed by CEDA on a permanent full or part-time basis.

Electronic Monitoring means all forms of monitoring of employees that is done electronically throughout the workplace, directly or indirectly, whether continuously, periodically, or on an as needed basis, and **Electronically Monitor** has a correlative meaning.

Human Resources Representative means a Business Partner, Manager, Director or Vice President (VP) of Human Resources.

Leader means any person who has direct accountability for an employees and/or contractors or group of employees and/or contractors and may include but is not limited to service line manager, supervisor, site supervisor, foreman, etc.

Personal Information means any information about the Employee or Contractor as an identifiable individual, and specifically includes information that is collected, used or disclosed solely for the purpose of establishing, managing or terminating an employment or contract relationship with the Employee or Contractor, as applicable. It does not include information that is put together (aggregated) in such a manner that it cannot be connected to an individual or information that is publicly available in a written or online directory or typically made available through directory assistance where the individual has an opportunity to decline being listed in the directory.

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5. Policy

CEDA is responsible for the Personal Information under its control and is committed to ensuring that the Employee's or Contractor's Personal Information provided to CEDA remains private and is used and disclosed only for the purposes of the employment or contractual relationship, unless such other use or disclosure is permitted or required by law. CEDA has designated its Privacy Officer (as detailed in Section 7.0) as being accountable for CEDA's overall compliance with privacy laws and with this Policy. The Privacy Officer may designate one or more individuals to be accountable for compliance with the Policy.

Other individuals within CEDA may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and processing of Personal Information. CEDA will dedicate the resources as are reasonably necessary to ensure compliance with this Policy.

CEDA will implement practices to give effect to this Policy, including:

- Implementing procedures to protect Personal Information in its possession or control and to oversee CEDA's compliance with the Policy.
- Establishing procedures to receive and respond to privacy inquiries, access requests or complaints.
- Training and communicating with Employees and Contractors about this Policy and CEDA's privacy practices.
- Developing public information to explain CEDA's Policy and privacy practices.

If you have already provided CEDA with Personal Information, CEDA will continue to use and disclose your Personal Information in accordance with the purposes for which it was collected. If an Employee or Contractor choses to withdraw or alter their consent, the Employee or Contractor may contact their Human Resources Representative to do so, but in some cases this may preclude the Employee or Contractor from continuing to be employed by or under contract with CEDA.

5.1 Protection of Personal Information

CEDA values its Employees' and Contractors' right to privacy and works diligently to protect Personal Information. CEDA will:

- Not collect, use or disclose Personal Information for any purpose other than those listed below, except as permitted or required by law or with the Employee's or Contractor's consent.
- Protect the confidentiality of Personal Information when doing business internally or externally with other organizations.
- Protect Personal Information with security safeguards appropriate to the sensitivity of the personal Information, against such risks as loss or theft, unauthorized access, disclosure, copying, use or destruction, regardless of the format in which it is held.

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- Retain Personal Information only as long as necessary for the fulfilment of the identified purposes, or as required by law, and will maintain reasonable and systematic controls, schedules and practices for the retention and destruction of such Personal Information.
- Strive to keep Personal Information as accurate and up-to-date as is necessary for the purposes identified above.
- Honour any request an Employee or Contractor may make for access to Personal Information, subject to exceptions permitted by law.

5.1.1 Data Security

CEDA will take commercially reasonable organizational, technical and physical measures designed to protect an Employee's/Contractor's Personal Information in CEDA's possession or control (including name, address, social insurance number, driver's license number, email address, or other identifying information) to prevent fraud or other crimes as required under applicable federal or provincial law. In addition, CEDA will use these measures to protect against unauthorized access to or use of Personal Information in connection with its disposal.

Disposal of Personal Information will occur under the general direction of the Privacy Officer and limited Employees will be involved in the disposal process. The method of disposal of Personal Information will be by burning, pulverizing, shredding paper or destroying or erasing electronic media so that it cannot practicably be read or reconstructed. Moreover, prior to disposal, Personal Information of Employees and Contractors will be maintained in a secure location within the Human Resources Department.

5.2 Collection and Use of Personal Information

CEDA is committed to ensuring that all Personal Information about Employees and Contractors that is provided to CEDA remains private. CEDA needs to collect information about its Employees in order to establish, manage and, where applicable, terminate the employment or contract relationship. CEDA recognizes that some of this information is sensitive or private, which is why Personal Information is only collected and used for the following purposes:

- To attract, develop, retain and consider for re-hire a highly skilled, professional and productive workforce that supports our business success. CEDA collects Personal Information about Employees and Contractors to determine fitness to work, to make employment and Employee/Contractor development decisions, to measure performance and to assess our ability to meet our business objectives. This includes the development and use of a database that is used to assess former Employees and Contractors for re-hire within the CEDA.
- To administer compensation, benefits, pension, incentive and departure programs. CEDA collects and records Personal Information to administer automatic payroll deposits, manage our benefits programs and report pay and compensation information to governmental authorities as required by the government or law.

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- To support the personal health and well-being of Employees. Personal Information is collected when providing various services to Employees, such as medical assessments and return to work assistance. All health-related Personal Information collected by CEDA in the course of providing these services is considered highly confidential and will be treated as such.
- To provide a safe and respectful workplace as required by law and CEDA policies. CEDA investigates and keeps records of safety incidents, accidents and injuries in order to provide a safe work environment and comply with the law. CEDA may also internally share information about safety incidents when appropriate for education and training purposes.
- To protect and manage corporate assets. CEDA logs and has the ability to monitor Employee and Contractor use of our technology network (voice, email, Internet) and CEDA may use video surveillance in some locations to enhance security for Employees and Contractors as well as for corporate assets.
- To meet legal, contractual and regulatory requirements. CEDA may collect or use Personal Information to satisfy government and client reporting requirements including voluntary self-declaration of socioeconomic statistics, to address insurance matters, in response to a court order, or to demonstrate our corporate due diligence.
- CEDA may use Personal Information to create aggregated and anonymized data and databases. These aggregated and anonymized data and databases may be used by CEDA for its business purposes.

The acceptance of employment and benefits by an Employee is viewed as consent for CEDA to collect, use and disclose Personal Information about the Employee for the purposes stated in this Policy. Similarly, the execution by a Contractor of a contract with CEDA is viewed as consent for CEDA to collect, use and disclose Personal Information about the Contractor for the purposes stated in this Policy

It is important that the information contained in CEDA's records is both accurate and current. If Personal Information happens to change during the course of employment, the Employee/Contractor is to advise the Human Resources Department of such changes.

In some circumstances, CEDA may not agree with the Employee's/Contractor's request to change Personal Information and, where appropriate, will instead append an alternative text to the record in question. In such cases, CEDA shall explain why.

5.3 Disclosure of Personal Information

Unless otherwise required or permitted by law, CEDA will only use or disclose Personal Information for the purpose for which it was collected. If any new purpose is identified consent will be obtained where appropriate.

Your Personal Information may be disclosed:

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- To financial institutions, benefit providers, government departments and agencies, such as Canada Revenue Agency or an employee association or union.
- To administer personal occupational health and safety programs, we may disclose information to the Workers' Compensation Board or health care professionals.
- When required by law or contractual obligations, we may disclose Personal Information to a creditor of yours at your request or to an entity with legal authority to obtain the information.
- In the event that CEDA undergoes a fundamental corporate change such as the sale of all or substantially all of its assets, in which case, subject to appropriate confidentiality and use restrictions as well as security safeguards, Personal Information may be disclosed to the counterparties to the transaction and their professional advisors.
- To other CEDA subsidiary and affiliated companies.
- To service providers, both in Canada and elsewhere, to perform services for CEDA. If you would like to obtain more information about CEDA's use of service providers and their locations, please contact our Privacy Officer.

6. Personnel Records

6.1 Maintenance of Files

The Human Resources Department oversees recordkeeping for Personal Information. Employees and Contractors have a responsibility to keep their personnel records up to date and should notify the Human Resources Department in writing of any changes (address, family status, births, marriage, death, etc.) as an Employee's/Contractor's income tax status and group insurance may be affected by these changes.

6.2 Examination of Personnel File

An Employee's or Contractor's request to examine his or her personnel file will be directed to the Human Resources department. Any access to a personnel file will be allowed in accordance with applicable laws.

6.3 Employee References

Requests for information from Employee/Contractor files received by other divisions or departments and inquiries from outside CEDA, including requests for references on former Employees or Contractors, will be directed to the Human Resources Department. All information requests and references will be given in accordance with applicable laws.

7. Workplace Electronic Monitoring

The work output of CEDA's Employees and Contractors, whether in paper record, computer files, or in any other storage format belongs to CEDA, and that work output, and the tools used to generate that work output, are always subject to review and monitoring by CEDA.

In the course of conducting business, CEDA may Electronically Monitor any Employee/Contractor activities and our premises and property. Some of our locations are equipped with surveillance cameras. These cameras are generally in high-risk areas or plant sites. Where in use, surveillance cameras are there for the protection of Employees/Contractors and third parties on site, and to protect against theft, vandalism and

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damage to CEDA's assets. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agencies or authorities.

Pursuant to our Information Systems and Technology Acceptable Use Policy, Electronic Monitoring of Employees and Contractors may also include direct access to the contents of the personally assigned account(s) and/or the device(s) used by an identified Employee or Contractor. This may include, but not limited to, email, voicemail, SharePoint, Webex and other storage space assigned for use by an individual Employee or Contractor.

This section does not mean that all Employees/Contractors will in fact be Electronically Monitored or their actions subject to constant surveillance. It is meant to bring attention to the fact that such Electronic Monitoring may occur and may result in the collection of Personal Information from Employees/Contractors. When using CEDA equipment or resources Employees and Contractors should not have any expectation of privacy with respect to their use of such equipment or resources.

Examples of Electronic Monitoring of Employees and Contractors include, but are not limited to:

- Monitoring by video surveillance - the date and time of access to physical locations.
- Monitoring IT security software and internet activity.
- Monitoring electronic key fob systems.
- Monitoring physical location of CEDA tablets.
- Monitoring physical location and speed using global positioning system (GPS) technology on fleet vehicles to determine utilization of the fleet and ensure company vehicles are being operated in a safe manner.
- Monitoring electronic logging device software records, which records a driver's driving time and duty status.

Examples of purposes for which information obtained through Electronic Monitoring might be used include:

- Identification and investigation of suspected or actual security incidents or non-compliance with CEDA's policies, standards, and procedures.
- Identification and management of threats, vulnerability, and risks to CEDA's assets, including fleet vehicles, and personnel.
- Protecting the integrity of CEDA's IT systems.
- Improving work efficiency by tracking employee use of specific tools or software, or tracking use of fleet vehicles.
- Tracking adherence to working time or attendance policies.

8. Privacy Officer

CEDA has designated CEDA's Chief Financial Officer as its Privacy Officer. If an Employee or Contractor has any questions concerning the handling of its Personal Information, or if an Employee or Contractor wishes

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to request access to, or correction of, Personal Information under CEDA's care and control, please set out the reasons for the concern in writing and forward to:

Alan Hartslief, Chief Financial Officer
Alan.Hartslief@cedagroup.com

9. Breach of Policy

A breach of this Policy or failure to comply with this Policy may result in disciplinary action, up to and including termination.

10. Supporting Documents

Document Name	Identification	Revision
INFORMATION SYSTEMS AND TECHNOLOGY ACCEPTABLE USE POLICY	PO-IT-CORP-001	latest
TRANSPORTATION SAFETY PRACTICE	2-CEDA-ALL-0097	latest
ELECTRONIC LOGGING DEVICE PROCEDURE	PR-AFS-CORP-002	latest

11. Interpretation and Updating

The Privacy Officer is responsible for responding to any requests for clarification and for regular review and updating of this policy.

12. Revision Record

Revision Date	Section Affected	Changes Made
MARCH 2012	New	
SEPT 21, 2017		Revised
JAN 25, 2023	Section 7	New template and revision to Section 7
JUNE 28, 2023	All Sections	Reviewed and revised by Third Party Legal Counsel

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