

Privacy Policy

2019



Alliance Borealis

Health, Safety and Environment Specialists



Scope

Alliance Borealis Canada Corp. (ABCCanada) incorporates into its Privacy Policy the provisions of Part 1 of the Personal Information and Electronic Documents Act (PIPEDA - Government of Canada), the principals of the Personal Information Protection Act (PIPA - Government of Alberta) and the ten [Principles Set Out in the National Standard of Canada Entitled Model Code for the Protection of Personal Information \(CAN/CSA-Q830-96\)](#).

1. Accountability

ABCCanada's Privacy Officer is accountable for ensuring compliance with ABCCanada's Privacy Policy, including by all individuals within ABCCanada who may be responsible for the day-to-day collection and processing of personal information.

ABCCanada is responsible for all personal information in its possession or control, including information that has been transferred to a third-party for processing. ABCCanada will use contractual or other means to provide an appropriate level of protection when a third-party processes information on behalf of ABCCanada.

ABCCanada will maintain our commitment to privacy by:

- implementing procedures to protect personal information;
- establishing procedures to receive and respond to complaints and inquiries;
- training staff and communicating to staff information about the company's policies and practices; and
- developing information to explain the company's policies and procedures.

2. Identifying Purposes

ABCCanada will identify the purpose for which personal information will be collected at or before the time the information is collected.

ABCCanada will document the purposes for which personal information is collected in order to comply with the Openness principle and the Individual Access principle.

ABCCanada will only collect information necessary to the defined purposes.

ABCCanada will verbally or in writing, inform the individual from whom personal information is requested, the purpose for the collection of the personal information at or before the time for which personal information is collected.

When personal information is collected for a new purpose not previously identified, ABCCanada will identify this purpose to the individual prior to use of the collected information. Unless the new purpose is required by law, consent will be obtained from the individual before the information is used for that purpose.

ABCCanada collects personal/contact information in order to:

- Manage customer accounts;
- Follow-up with individuals to determine their interest in the products and services provided by ABCCanada and inform them of new products, services or promotions;
- Screen individuals for employment or contracting suitability;
- Manage and administer personnel (including performance appraisals, security, access control and disciplinary measures);
- Manage and administer compensation and benefits programs;



- Administer payroll;
- Administer occupational health and safety programs;
- Monitor and track skills and competency development;
- Meet legal and regulatory requirements (e.g. Employment Standards Legislation, Canada Customs and Revenue Agency reporting requirements);
- Facilitate ABCanada audits when required to do so;
- Provide contact information of ABCanada staff to ABCanada insurers;
- Provide such information as may be required for administration of ABCanada programs.

ABCanada is not responsible for the management of Personal Information collected by its customers through use of ABCanada products and services. However, ABCanada employs reasonable measures to ensure the safety and protection of its customers' information. ABCanada employs strict policies and procedures to protect and maintain the confidentiality of this information. These measures are outlined in the contracts signed by ABCanada customers. Furthermore, ABCanada considers all information collected by its customers as confidential and does not access or use its customer's information other than for data maintenance, auditing or trend analysis (e.g. benchmarking).

3. Consent

ABCanada obtains consent as required for the collection, use and disclosure of personal information and uses reasonable efforts to ensure that individuals understand how their personal information will be used.

ABCanada obtains consent at the same time personal information is collected. However, it may, at times, obtain consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.

The sensitivity of the information and the reasonable expectations of the individual determine the form of consent. Express consent will be requested when the information is likely to be considered sensitive; implied consent will be accepted when information is less sensitive. In some cases, consent may be obtained through an individual's authorized representative (such as a legal guardian or a person having power of attorney).

ABCanada may use written, verbal or digital means for obtaining consent for the collection, use or disclosure of information.

In certain circumstances personal information may be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical, or security reasons may make it impossible or impractical to seek consent. When information is being collected for the detection and prevention of fraud or for law enforcement, seeking the consent of the individual might defeat the purpose of collecting the information. Seeking consent may be impossible or inappropriate when the individual is a minor, seriously ill, or mentally incapacitated. In addition, organizations that do not have a direct relationship with the individual may not always be able to seek consent.

Consent may be withdrawn at any time, subject to legal or contractual restrictions and reasonable notice. ABCanada and/or the Privacy Officer informs individuals of the implications for withdrawing consent.

4. Limiting Collection

ABCanada limits the amount and type of personal information collected to that which is necessary for the identified purpose.

ABCanada collects information by fair and lawful means.



ABCCanada may collect the following information from employees, contractors and suppliers:

- Demographic and contact information including home address and telephone number, date of birth, and social insurance number;
- Training, experience and skills as necessary to establish competence, and regulatory, employer or industry standards compliance;
- Education and employment history;
- Banking or financial information;
- Health information;
- Security background checks, as required.

ABCCanada may collect the following personal information from customers of ABCCanada:

- Names and contact information, including home address and telephone numbers;
- HSE program documentation (e.g., policies, procedures, practices and forms) and data included in reports of incidents, hazards, workplace inspections, preventive maintenance programs, safety meetings, safety training and other relevant indicators of safety performance;
- Demographic information about customer(s) for ABCCanada programs, including number of employees, and interest in programs or facilities for system planning purposes;
- Financial information, if members involved in programs with financial eligibility requirements, or where payment is required for programs or services.

ABCCanada may collect personal information through the following means:

- Solicited and unsolicited resumes and correspondence;
- Completed application forms (paper or on-line format) for employment, benefits, grants and bursaries, business and other program registrations, etc.;
- Worksite audits, inspections and assessments in person and through telephone interviews;
- Online forms through the website.

5. Limiting Use, Disclosure and Retention

ABCCanada does not use or disclose personal information other than for the purpose for which it was collected, except with the consent of the individual or:

- As required or authorized by law;
- In the event that it is required by legal counsel representing ABCCanada;
- As required to collect a debt owed by the individual to ABCCanada;
- As required to comply with a subpoena, warrant or court order;
- When the information is publicly available; or
- To a public authority in the event of imminent danger to any individual.

Only ABCCanada employees or contractors with a business need-to-know, or whose duties so require, are granted access to personal information.

ABCCanada has developed guidelines and implemented procedures with respect to the retention of personal information. ABCCanada retains personal information only as long as it is necessary for the identified purpose, or as required by law. Where personal information is used to make a decision about an individual, ABCCanada retains the information, or the rationale for making the decision, long enough to allow the individual access to the information after the decision has been made.

Personal information that is no longer required to fulfill the identified purposes or required by law to be retained is destroyed, erased or made anonymous.



6. Accuracy

ABCCanada provides our best efforts to ensure that personal information collected, used and disclosed is as accurate, complete and up to date as necessary for the purposes for which it is to be used.

Personal information is kept sufficiently accurate, complete and up to date to minimize the possibility that inappropriate information may be used to make a decision about the subject individual.

ABCCanada updates personal information as and when necessary to fulfill the identified purpose or upon notification by the individual who is the subject of the information.

7. Safeguards

ABCCanada protects personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, regardless of the format in which it is held.

ABCCanada has developed and implemented information security policies and procedures that outline physical, organizational, and technological measures in place to protect personal information as appropriate to the sensitivity of the information. These same measures are employed in the safeguarding and protection of information resources of ABCCanada customers.

ABCCanada protects personal information disclosed to, or processed by third parties by contractual agreements which address the following as necessary:

- Identifying the types of records provided, collected, created or maintained in order to deliver the service, and specifying any applicable privacy legislation;
- Stipulating the confidentiality of the information and the purposes for which it is to be used;
- Identifying the organization(s) having custody and control of the records, including the responsibility and process for handling requests for access to information;
- Ensuring that third parties and their employees having access to ABCCanada and information assets are aware of, and understand their responsibility to adhere to ABCCanada information handling and security policies, including maintaining the confidentiality of personal information;
- Ensuring that ABCCanada has access to information produced, developed, recorded or acquired by third-parties as a result of the contract, including timely access in response to requests for information, and specifying that third parties shall not deny access to, or retain custody of, personal information because of late or disputed payment for services;
- Requiring third parties to report breaches of confidentiality and privacy to ABCCanada Privacy Officer within 48 hours of knowing that the breach occurred;
- Addressing disaster recovery and backup of any information assets and systems in the custody of the third party;
- Addressing the disposition (e.g. destruction or return) of all of ABCCanada information assets (e.g. records, hardware, system documentation) upon termination of the contract;
- Specifying any audit or enforcement measures that ABCCanada will undertake to ensure that third parties comply with information handling and security provisions outlined in contractual agreements (for example, non-disclosure agreements, audit trails, regular review of third-party access requirements, inspection of third-party premises).

ABCCanada ensures that all employees are aware of its privacy policies and procedures and understand the importance of maintaining the confidentiality of personal information.

Care shall be taken in the disposal or destruction of personal information to prevent unauthorized parties from obtaining access to the information.



8. Openness

Upon request, ABCanada makes available specific information about its policies and practices relating to the management of personal information, including:

- The means of gaining access to personal information held by ABCanada;
- Identification of personal information held by ABCanada, and a general account of its use;
- ABCanada Privacy Policy, guidelines and related procedures are posted and available on our website;
- Reference to the statement of ABCanada Privacy Policy on ABCanada website, if applicable.

To make an inquiry or lodge a complaint about ABCanada personal information handling policies and procedures, contact:

ABCanada Privacy Officer
300, 160 Quarry Park Blvd. SE Calgary, Alberta Canada T2C2G3
customer.care@ABCanada.com

9. Individual Access

Upon request, ABCanada provides individuals with access to their personal information held by the company. Individuals have the right to challenge the accuracy and completeness of their personal information held by ABCanada, and to have it amended as appropriate.

All requests by individuals (e.g. customers, employees, contractors) to access their personal information held by ABCanada, or to correct or amend their personal information, should be directed to the designated Privacy Officer. Such requests should be in writing.

ABCanada responds to requests for access to personal information within 30 business days.

Responding to an individual's request for information is usually done at no or minimal cost to the individual. However, a fee for reasonable costs incurred may be charged when responding to more complex requests, provided the individual is informed in advance.

In order to safeguard personal information, ABCanada may request sufficient information from the individual to verify that person's identity.

Limitations to Individual Access

ABCanada provides individuals access to their personal information, subject to limited and specific exceptions. ABCanada will refuse access to personal information if:

- ABCanada has disclosed information to a government institution for law enforcement or national security reasons;
- It would reveal personal information about a third party unless there is consent or a life-threatening situation;
- Doing so could reasonably be expected to threaten the life or security of another individual;
- The disclosure would reveal confidential commercial information;
- The information is protected by solicitor-client privilege;

If access to information is refused, ABCanada shall, in writing, inform the individual of the refusal, the reason(s) for the refusal, and any recourse the individual may have to challenge ABCanada decision.

Correction/Amendment of Personal Information

ABCanada corrects or amends personal information as required when an individual successfully demonstrates the inaccuracy or incompleteness of the information. Amendment may involve the



correction, deletion, erasure, or addition to any personal information found to be inaccurate or incomplete.

Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, ABCanada shall inform any third parties having access to the personal information in question as to any amendments, or the existence of any unresolved differences between the individual and ABCanada.

10. Challenging Compliance

ABCanada investigates all complaints concerning compliance with its Privacy Policy, guidelines and practices, and responds within 30 days of receipt of a complaint. If a complaint is found to be justified, ABCanada takes appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. Individuals shall be informed of the outcome of the investigation regarding their complaint.

Complainants may address inquiries or complaints concerning compliance with these policies or guidelines by contacting ABCanada's Privacy Officer as set out in this Policy under Openness. A complaint may also be addressed in writing to the Privacy Commissioner of Canada at 112 Kent Street, Ottawa, Ontario, K1A 1H3 -or- to the Office of the Information and Privacy Commissioner of Alberta, #410 - 9925 - 109th Street, Edmonton, AB, T5K 2J8, 780-422-6860, www.oipc.ab.ca.