

SECURE Energy Services

Human Resources Policy

INTRODUCTION

This Policy Handbook is in place to familiarize all employees with SECURE's policies related to employment. The Executive reserves the right to alter, amend or make final judgements of the interpretation of the contents of this handbook.

The use of such pronouns as "we" or "our" will be taken to mean or refer to SECURE.

If you have any questions, contact a member of Human Resources team.

POLICY: PRIVACY

During the course of our normal business activities, SECURE collects personal information from and about employees, clients and business partners / associates. We recognize our professional obligation to maintain the confidentiality of our clients' and employee information. This policy has been developed with those obligations in mind and adherence to this policy is the responsibility of all employees.

SECURE will comply with all applicable regulatory requirements, including the Personal Information Protection Act (PIPA) concerning the collection, use or disclosure of personal information.

The VP – People, Planning & Recruitment is designated as the Corporation's Privacy Officer under applicable legislation.

Personal Information Protection

"Personal information" means information about an identifiable individual. This may include an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, etc., but does not include "business contact information".

Collection, Use and Disclosure of Employee Personal Information

Employee personal information that is reasonably required by SEUCRE is collected, used or disclosed for the purposes of establishing, managing or terminating an employment relationship. We will obtain employee consent to collect, use and disclose employee personal information for purposes unrelated to the employment relationship (e.g. such as providing employees information about a workplace charitable giving program).

SECURE may collect, use and disclose personal employee information to meet the following purposes:

- Determining eligibility for employment including verifying employment qualifications and references
- Establishing training and development requirements
- Assessing performance and managing performance issues if they arise
- Administering pay and benefits
- Processing employee work-related claims (e.g. benefits, workers' compensation, insurance claims)
- Complying with applicable laws (e.g. Canada Income Tax Act, Alberta Employment Standards Code)
- Contact information such as name, home address, telephone number
- Criminal background checks
- Employment information such as resume (including educational background, work history and references), reference information, interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, emergency contacts, etc.
- Benefit information on forms and applications related to health and insurance benefits including medical and dental care, life insurance, short and long-term disability, etc.
- Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers/Social Security Number
- Other personal information required for the purposes of our employment relationship

Additionally, data regarding employee use of company assets may be collected for purposes identified under the Information Technology Acceptable Use Policy through standard tracking technologies and reporting protocols. Information collected in this manner may be used by SECURE for the purposes of managing and/or terminating the employment relationship.

PROCEDURES

In the event that SECURE needs to collect additional personal information about an employee, use for a purpose not originally anticipated, or disclose personal information to a third party outside the parameters of the initial collection, then SECURE shall notify the employee to obtain their consent as required.

In some cases, after your employment relationship with SECURE ends, we may be contacted by other organizations and asked to provide a reference for you. It is our policy not to disclose personal information about our employees to other organizations who request references unless we have the employee's consent. The personal information we provide in a reference is a confirmation that an individual was an employee, including the position, and date range of the employment.

SECURE shall protect the personal information that is in its possession and control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction.

We achieve this by:

- keeping our records in locked filing cabinets;
- having up-to-date computer security, including passwords, encryption and firewalls;
- ensuring that only authorized HR employees have access to the records, either in paper or electronic format.
- ensuring that any third parties hired to assist us with providing products and services to our clients, and who require access to personal information, sign a privacy and confidentiality agreement to ensure that this information is likewise protected by them.

In the event that the security of personal information has been compromised, SECURE will notify affected employees as soon as possible and initiate all possible steps to mitigate the effects of the breach.

Employee Access to Personal Information

SECURE will, while complying with the applicable regulatory requirements, confidentially maintain all required and relevant information relating to employees in the personnel file with Human Resources. The Employees may request access to any stored personal data or to their personnel file at any time by contacting their Human Resources Representative who will make the contents available, within a reasonable amount of time, to the employee in the presence of an Human Resources Representative. Employees may make copies of information in their personnel file with the knowledge of the Human Resources Representative.

SECURE may, according to the provisions in PIPA, refuse to provide access to information that would reveal personal information about another individual and may withhold that information and provide you with the remainder of the record.

Individuals may also request information about SECURE's use of their own personal information and any disclosure of that information outside our organization. In addition, individuals may request a correction of an error or omission in their own personal information.