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	EMPLOYEE PRIVACY POLICY	FEBRUARY 2012	
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## EMPLOYEE PRIVACY POLICY

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## 1.0 PURPOSE

### Why do we Have an Employee Privacy Policy?

CEDA International Corporation and all of its subsidiaries and affiliates (“**CEDA**”) are 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, and how this information will be kept safe.

The purpose of the CEDA Employee Privacy Policy (the “**Policy**”) is to inform you that the Policy applies to all employees of CEDA, and advise of:

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

This Policy is intended to comply with the applicable federal, state and provincial privacy legislation in all the jurisdictions that CEDA operates. We have created this Policy to outline the requirements under the applicable privacy legislation and industry regulations which apply to personal information in any form whether oral, electronic or written.

## 2.0 DEFINITIONS

**CEDA** means CEDA International Corporation and its subsidiaries, all entities forming part of the CEDA Group of Companies.

**CEDA BUSINESS** means all work-related activities engaged in by EMPLOYEES and subcontractors while working on CEDA or customer premises or CEDA worksites, participating in company-related social activities, in public while representing CEDA, or operating any vehicles leased or owned by CEDA (including heavy equipment) in conjunction with these activities.

**CONSUMER INFORMATION** means any record about an individual, whether in paper, electronic, or other form, that is a consumer report (as defined under the Fair Credit Reporting Act) or is derived from a consumer report. It includes an employee's data privacy information as described above.


**EMPLOYEE** includes any person employed by CEDA on a permanent full or part-time basis as well as independent contractors of CEDA and subcontractors providing services to CEDA or on behalf of CEDA.

**LEADER** means an employee of CEDA who has direct accountability and responsibility for one or more direct reports.

**PERSONAL INFORMATION** means any information about you as an identifiable individual, and specifically, information that is collected, used or disclosed solely for the purpose of establishing, managing or terminating an employment relationship with you. It does not include information that is put together (aggregated) in such a manner that it cannot be connected to a person and/or information that is publicly available in a written or online directory or typically made available through directory assistance.

**WORKPLACE** means any location to which an Employee regularly reports for work.

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### 3.0 SCOPE

#### Who does this Policy Apply to?

This Policy applies to all Employees, Leaders, contractors, and subcontractors of CEDA. 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 code shall apply.

### 4.0 POLICIES

CEDA knows and respects that all Employees care about maintaining the privacy of their Personal Information.

CEDA is committed to working with its Employees to ensure Personal Information provided to CEDA remains private.


#### *Why do we collect and use your Personal Information?*

CEDA needs basic information about its Employees in order to establish and manage the employment relationship. CEDA recognizes that some of this information is sensitive or private, which is why CEDA collects Personal Information only 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 to determine fitness to work, to make employment and employee 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 for re-hire within the CEDA.
- To administer compensation, benefits, pension and departure programs. CEDA collects and records Personal Information to administer automatic payroll deposits, manage our benefits programs and report pay and compensation information as required by the government or law.
- 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 use of our technology network (voice, email, Internet) and CEDA may use video surveillance in some locations to enhance security for Employees as well as for corporate assets.
- To meet legal, contractual and regulatory requirements. CEDA may collect or use 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.

Unless required or permitted by law, CEDA will not use or disclose for any new purpose, Personal Information that has been collected without first identifying and documenting the new purpose and obtaining your consent where appropriate.

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#### *When do we disclose your Personal Information?*

Your Personal Information may be disclosed:

- Internally, between different departments at CEDA for the purposes stated above.
- Internally, to administer compensation, benefits, pension, incentive and departure programs.
- Externally, information is disclosed to financial institutions, benefit providers, government departments and agencies, such as Canada Revenue Agency or an employee association or union.
- Externally, to administer personal occupational health and safety programs, we disclose information to the Workers' Compensation Board or health care professionals.
- Externally, 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.

#### *How do we protect your Personal Information?*

CEDA values its Employee's 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 above, required by law or by Employee's consent.
- Protect the confidentiality of Personal Information when doing business internally or externally with other organizations.
- Protect Personal Information with appropriate and effective security safeguards against such risks as loss or theft, unauthorized access, disclosure, copying, use or destruction, regardless of the format in which it is held.
- 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 may make for access to Personal Information, subject to exceptions permitted by law.

#### *What is CEDA's Accountability?*

CEDA is responsible for the Personal Information under its control. CEDA has designated its Privacy Officer (as detailed in the information under Section 7.0 below) as being accountable for CEDA's overall compliance with privacy laws and with this Policy. Responsibility for ensuring compliance with the Policy lies with our Privacy Officer, who 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 this Policy is adhered to.

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

- Implementing procedures to protect Personal Information 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 for Employees about this Policy and privacy practices.
- Developing public information to explain CEDA's Policy and privacy practices.

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 above.

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

### **What protections does CEDA have in place with respect to my Personal Information?**

#### *Employee Medical Records*

Any information obtained from an Employee or an Employee's healthcare provider or otherwise relating to medical or health conditions will be maintained in a separate file and kept confidential in accordance with applicable state and federal law.

#### *Data Privacy*


CEDA will take measures to protect an Employee's data information (name, address, social security number, driver's license number, email address, credit card number, or other identifying information) to prevent fraud or other crimes as required under applicable federal or state law. In addition, CEDA will protect against unauthorized access to or use of Consumer Information in connection with its disposal.

Disposal of Consumer 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 Consumer 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, consumer reports will be maintained in a secure location within the Human Resources Department.

#### *Personnel Records*

- **Procedure for maintenance of files.** The Human Resources Department oversees recordkeeping for Personnel Information. Employees 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 income tax status and group insurance may be affected by these changes.
- **Examination of Personnel File.** An Employee'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 state law.

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

## 5.0 EMPLOYEE ACCOUNTABILITIES

### What is an Employee's Responsibility under this Policy?

It is important for CEDA to know that every Employee has read and understands this Policy. For this reason CEDA asks that each Employee:

- Review and understand this Policy.
- Consent to the collection, use and disclosure of your employment related Personal Information in accordance with this Policy.
- Understand that CEDA may require further information that falls within the scope of this Policy, and may require additional written consent in certain circumstances.


## 6.0 WORKPLACE MONITORING

### How does Workplace Monitoring Affect an Employee's Privacy?

The work output of CEDA's Employees, 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. This monitoring is to secure the privacy of work output, for the benefit of both CEDA and its Employees, customers, and other third parties.

In the course of conducting business, CEDA may monitor Employee 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 and third parties, and to protect against theft, vandalism and 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 Acceptable Use of Technology – Internet and E-mail Policy, we have the capability to monitor all Employees' computer and e-mail use.

This section does not mean that all Employees will in fact be monitored or their actions subject to constant surveillance. CEDA has no duty to monitor. It is meant to bring attention to the fact that such monitoring may occur and may result in the collection of Personal Information from Employees. When using CEDA equipment or resources Employees should not have any expectation of privacy with respect to their use of such equipment or resources.

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## 7.0 PRIVACY OFFICER

### How Can You Communicate With Us?

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

David Churchill, Chief Financial Officer  
David.Churchill@cedagroup.com

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 is to advise the Human Resources Department of such changes.

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

### How Will You Know if Changes are Made to this Policy?

CEDA may from time to time make changes to this Policy to reflect changes in its legal or regulatory obligations or in the manner in which CEDA deals with Personal Information. CEDA will communicate any revised version of this Policy. Any changes to this Policy will be effective from the time of implementation, provided that any change that relates to why CEDA collects uses or discloses Personal Information will not apply to Employees, where consent is required for such collection, use or disclosure, until we have obtained Employee's consent for such change.

Any applicable specific law provisions that address privacy in the Workplace, will be taken into account. Where a provision of this Policy conflicts with applicable law, the applicable law shall supersede this Policy.

## 8.0 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.

## 9.0 APPROVAL HISTORY

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

Effective Date:	March 2012
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