ABC COMPANY EMPLOYEE PRIVACY POLICY

Dear ABC Company Employees:

ABC Company is committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that ABC Company collects from or about you, how we use that information who we disclose it to.

WHAT THIS POLICY DOES & DOESN'T COVER

This Privacy Policy applies to the personal information of all individuals who apply to be, are, or were employed by ABC Company (collectively, "employees"). Exception: Personal information collected, used or disclosed using the ABC Company website is covered not by this Privacy Policy but by the "Website Privacy Statement" posted on the ABC Company website itself at [*insert URL*].

For purposes of this Privacy Policy, "personal information" means any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications. Personal information does not include anonymous or non-personal information, i.e., information that can't be associated with or tracked back to a particular individual.

COMPLIANCE WITH PRIVACY LAWS

ABC Company's policy is to comply with the privacy legislation of each province and territory where we operate—and with federal PIPEDA law (*Personal Information Protection & Electronic Documents Act*) to the extent an operation is subject to federal regulation.

This Privacy Policy establishes a general framework. Because employee privacy rights vary from jurisdiction to jurisdiction, some of the rights, obligations and procedures set out in this Privacy Policy may not apply the same way—or apply at all—to ABC Company employees working in certain locations and/or conducting certain operations.

If you're unsure or have questions about whether and how this Privacy Policy applies to you, please ask [*insert contact, e.g., the HR or privacy director*].

PERSONAL INFORMATION ABOUT EMPLOYEES WE COLLECT

ABC Company collects and maintains different types of personal information concerning employees, including the personal information contained in:

- Resumes and job applications;
- References and interview notes;
- Photographs and video;
- Letters offering and accepting employment;

• Mandatory policy acknowledgement sign-off sheets;
• Payroll information; including but not limited to social insurance number, pay cheque deposit information, and GRRSP/ESP information;
• Wage and benefit information;
• Forms relating to the application for, or in respect of changes to, employee health and welfare benefits; including, short and long term disability, medical and dental care; and
• Beneficiary and emergency contact information.

ABC Company also collects personal information such as names, home addresses, phone numbers, personal email addresses, dates of birth, employee identification numbers and marital status, and any other information necessary to ABC Company's business purposes, which is voluntarily disclosed in the course of an employee's application for and employment with ABC Company.

ABC Company generally collects personal information directly from you, the employee. We generally get your permission first before we try to collect personal information about you that is held by a third party either by asking you directly for permission or implying that we have your permission on the basis of your actions.

From time to time, ABC Company may receive personal information about you collected from third parties we do business with in the course of our business interactions. In those circumstances, ABC Company will take reasonable steps to ensure that those third parties have represented to us that they have the right to disclose your personal information to us.

ABC Company may also collect personal information about you without your knowledge or consent where we're allowed to do so by law.

PURPOSES OF COLLECTING EMPLOYEE PERSONAL INFORMATION

ABC Company uses, collects and discloses personal information about employees for our business purposes, including:

- Establishing, managing or terminating your employment;
- Deciding if you're eligible to be offered a job, including verification of your references and qualifications;
- Administering pay and benefits;
- Processing employee work-related claims (e.g. workers' compensation, insurance claims, etc.);
- Establishing training and/or development requirements;
- Conducting performance reviews and determining performance requirements;
- Assessing qualifications for a particular job or task;
- Gathering evidence for disciplinary action or termination;
- Establishing a contact point in the event of an emergency (such as next of kin);
- Complying with applicable labour or employment laws;
- Compiling directories;
- Ensuring the security of company-held information; and

- Other purposes as are reasonably required by ABC Company.

MONITORING

The work output of ABC Company employees, whether in paper record, computer files, or any other storage format belongs to us. Such work output and the tools used to generate it are always subject to review and monitoring by ABC Company **and you should not have any expectation that they constitute your private information.**

In the course of conducting business, we may monitor employee activities and our premises and property, such as by installing surveillance cameras at workplaces that pose high security risks. Any such surveillance cameras are there for the protection of employees and third parties, and prevent theft, vandalism and damage to ABC Company goods and property. In most cases, recorded images are routinely destroyed and not shared with third parties. Exception: Such records may be turned over to the police or other appropriate government agency or authority where there's suspicion of a crime or such disclosure is otherwise necessary to enforce the laws.

ABC Company also reserves the right to monitor all employees' computer and e-mail use.

HOW WE USE EMPLOYEE PERSONAL INFORMATION

ABC Company may use your personal information for:

• The purposes described in this Privacy Policy; or
• Any additional purposes that we advise you of and get your consent to where such consent is required by law.

ABC Company may also use your personal information without your knowledge or consent where we're allowed or required to do so by law.

HOW & WHEN WE DISCLOSE EMPLOYEE PERSONAL INFORMATION

ABC Company may share your personal information with our employees, contractors, consultants and other parties who require the information to help us establish, manage or terminate your employment. In some instances, such parties may also provide certain information technology and data processing services to us so that we may operate our business. We may share personal information with such parties both in and outside of your home jurisdiction, and as result; your personal information may be collected, used, processed, stored or disclosed in Canada and the United States.

We typically require the parties with whom we share personal information to comply with the terms of this Privacy Policy when using or disclosing that information.

In addition, your personal information may be disclosed:

• As permitted or required by law or regulatory requirements—in which case, ABC Company

will try not to disclose more personal information than required under the circumstances;
• To comply with valid legal processes such as search warrants, subpoenas or court orders;
• As part of ABC Company's regular reporting activities;
• To protect the rights and property of ABC Company;
• During emergency situations or where necessary to protect a person's safety;
• Where the personal information is publicly available; or
• With your consent where such consent is required by law.

NOTIFICATION & CONSENT

ABC Company is generally not required by privacy laws to get your consent to collect, use or disclose personal information for the purpose of establishing, managing or terminating your employment. In addition, we may collect, use or disclose your personal information without your knowledge or consent where allowed or required by law.

If we do need your consent, we will assume, unless you tell us otherwise, that you have consented to ABC Company's collecting, using and disclosing your personal information for the purposes stated above. You may also, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications withdrawing or varying the terms of your consent should be in writing and addressed to [*list contact*].

HOW WE PROTECT EMPLOYEE PERSONAL INFORMATION

ABC Company maintains physical, technical and procedural safeguards to protect your personal information and ensuring that it doesn't get lost and secured from unauthorized access, copying, use, modification or disclosure.

HOW LONG WE RETAIN EMPLOYEE PERSONAL INFORMATION

Except as otherwise allowed or required by law, ABC Company tries to ensure that we retain your personal information only for as long as we believe is necessary to fulfill the purposes for which we collected it. Once we determine that retaining that information is no longer necessary, ABC Company will destroy or erase or make it anonymous so that it can't be associated with or tracked back to you.

UPDATING OF EMPLOYEE PERSONAL INFORMATION

We ask you to keep us informed if and when your personal information happens to change during the course of your employment so that we can ensure that the information contained in our records is both accurate and current.

You may request that we change your personal information at any time. If we don't agree to the requested change, we will instead append an alternative text to the record in question.

EMPLOYEE ACCESS TO THEIR PERSONAL INFORMATION

You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information, contact [*list contact name and instructions*] in writing.

When requesting access to your personal information, ABC Company may ask you for information so that we can confirm your identity and right to access, as well as to search for and provide you the personal information you want. We may charge you a fee to access your personal information; but we'll advise you of any fee in advance. If you require assistance in preparing your request, please contact [*list contact name and instructions*].

Your right to access the personal information that we hold about you is subject to limits. The law may allow or even require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we can't provide you access to your personal information, we'll make an effort to explain the reasons why, subject to legal restrictions.

ABC COMPANY'S RIGHT TO REVISE THIS PRIVACY POLICY

ABC Company may make changes to this Privacy Policy in accordance with changes to legal requirements or internal information policies and practices. We'll notify you of any changes we make and distribute to you a revised version of the Privacy Policy incorporating the change.

QUESTIONS OR CONCERNS

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact [*list contact and instructions*].