



POLICY S3.55.3

Privacy

1. Purpose

Kenaidan is responsible for Personal Information that employees disclose to us or that we generate as a result of the employment relationship with our employees. The following document outlines the company's policy on the collection, access, use, disclosure, and storage of Personal Information.

2. Scope

Personal Information is any factual or subjective information about an identifiable individual including age, name, SIN, drivers license number, health card number, income, ethnic origin, blood type, medical information, evaluations, comments, social status or disciplinary actions. Personal information does not include the name, title, business address or business telephone number of the employee.

3. Definitions

n/a

4. Responsibilities

n/a

5. Policy

Collection and Use of Personal Information

It is company's policy to restrict our collection of Personal Information to only that which is absolutely necessary for us to manage the employment relationship with our employees. The company collects Personal Information directly from employees or with consent from other sources for the purposes of:

- Administering the employee payroll and benefits (including, medical, dental, life insurance, accidental death insurance, long term disability insurance, and our group RRSP Plan).



**KENAIDAN CONTRACTING LTD.
ISO 9001 QUALITY MANUAL
HUMAN RESOURCES**

- Assessing an employee's job performance which includes performance reviews, tests, personality and behavioral assessments, and disciplinary notes.
- Assessing disabilities for the purposes of providing accommodation.
- Maintaining communication with our employees in the event of a company or civic emergency.
- Assessing an employee's skills and experience for hiring and job promotion.
- Administering our commercial fleet policy for those employees who have company assigned vehicles. Including driving records.
- Information we are required to collect for reporting to government agencies including the Canada Customs and Revenue Agency and the Workers Compensation Board.

Disclosure

The company restricts the disclosure of Personal Information to only those employees and external organizations that require this information to provide a necessary service (payroll systems providers, banks for pay deposits, and insurance companies for employee benefits). The company also releases resumes to prospective clients as part of the tendering or prequalification process.

On occasion outside parties will contact us to verify employment (usually for the purposes of loans or other financial arrangements) we will not disclose any information unless the employee has provided us with written consent. If you should terminate your employment with the company, we will not provide employment verification to an outside party without your written consent.

Internally, the dissemination of personal information is restricted to the specific information that is required for employees in Payroll, Accounting and Human Resources to complete their job functions. Employees in these job functions are required to keep this information confidential. (see policy S3.55.4 R1 Confidentiality of Information).



Consent

The company obtains consent from employees for the collection, use and disclosure of Personal Information through the signoff of this policy by the employee. Should the purposes for which Personal Information is being collected, used or disclosed change the company will notify the employee and obtain their consent.

Retention & Storage

The company has taken steps to ensure that Personal Information is safeguarded from unauthorized access or disclosure regardless of the format in which it is held by employing various methods of protection appropriate to the sensitivity of the information. These include:

- Technological measures such as passwords, firewalls and access rights.
- Organizational controls including limiting access on a “need-to-know” basis.

It is our policy to retain employee records containing Personal Information for 7 years following the date of termination of the employee.

Access

Employees have the right to access their Personal Information at any time. Requests to see files should be directed to the HR or Payroll Departments.

Accuracy

The company uses every effort to ensure that personal information is accurate and complete for the purposes for which it is to be used. As part of the access process noted above if an employee determines that factual information about them is inaccurate they should bring this to the attention of Human Resources or Payroll.



**KENAIDAN CONTRACTING LTD.
ISO 9001 QUALITY MANUAL
HUMAN RESOURCES**

Challenging Compliance

Employees can address any questions regarding the compliance with the above principles to the company's designated Compliance Officer – Brian Jorge – VP Preconstruction.

Kenaidan's executive management reviews all HR Policies periodically to ensure they continue to be relevant to the needs of the business and reserves the right to modified policies as required.

6. Records

7. Measures

n/a

8. References

S3.55.4 R1 Confidentiality of Information