



**PetroChina
Canada**

Policy

PRIVACY POLICY

PCC-CM-PI-00016

REVISION 2

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1. PURPOSE AND SCOPE

PetroChina Canada Ltd. (“**PetroChina Canada**” or the “**Company**”) respects the privacy of individuals and endeavours to maintain the accuracy, confidentiality, and security of Personal Information (as defined below) under its custody or control. The purpose of this Privacy Policy (the “**Policy**”) is to provide information relating to the collection, use and disclosure of Personal Information that may be collected by the Company regarding the Company’s Employees (as defined below). This Policy applies in respect of all activities of the Company which are governed by privacy legislation in Canada. All Employees are expected to comply with this Policy when collecting, using, retaining or disclosing Personal Information. All references to PetroChina Canada or the Company in this Policy will include any and all of its subsidiaries, as may be applicable.

2. GUIDING PRINCIPLES AND POLICY GUIDELINES

This Policy is to be applied consistently across the Company.

For the purposes of this Policy, “**Personal Information**” is 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. For the purposes of this Policy, “**Employee**” means an individual employed by the Company and includes individuals who perform a service for or in relation to or in connection with the Company as a partner or a director, officer or other office-holder of the Company, as an apprentice, volunteer, participant or student, or under a contract or an agency relationship with the Company. Employee includes potential, current and former Employees.

Applicable privacy legislation does not generally require the Company to obtain an Employee’s consent for the collection, use or disclosure of Personal Information for the purpose of establishing, managing or terminating a work relationship. In addition, the Company may collect, use or disclose an Employee’s Personal Information without such Employee’s knowledge or consent where the Company is permitted or required by applicable law or regulatory requirements to do so.

The Company will limit the collection of Personal Information to the information that is reasonably required for the purposes identified by the Company and the Company will take reasonable steps to ensure that such information will be collected by fair and lawful means.

The Company will only use or disclose Personal Information for the purposes for which it was collected unless the Employee has otherwise consented or an exception is provided for under the applicable legislation.

The Company will retain Personal Information for the period of time required to fulfill the purposes for which it was collected.

The Company will endeavour to maintain accurate, complete and up-to-date Personal Information as is necessary to fulfill the purposes for which it is to be used or disclosed.

The Company will take steps to protect the Personal Information under its custody or control by implementing security safeguards that are appropriate to the sensitivity level of the information.

The Company will, upon written request and subject to the applicable legislation, inform an individual of the existence, use and disclosure of their Personal Information, and provide that individual with access to such information.

The following guidelines apply to this Policy:

A. WHAT PERSONAL INFORMATION WE COLLECT

The Company collects and maintains different types of Personal Information in respect of those individuals who seek to be, are, or were employed by PetroChina Canada, including the Personal Information contained in a personnel or similar or related file, such as:

- a. resumes and/or applications;
- b. references and interview notes;
- c. photographs and video;
- d. letters of offer and acceptance of employment, as well as other terms and conditions of employment as may be applicable;
- e. personal contact information;
- f. payroll information; including but not limited to social insurance number, paycheque deposit information, and other related information;
- g. wage and benefit information;
- h. taxation details;
- i. hours worked, absences, vacation dates;
- j. performance reviews
- k. disciplinary matters;
- l. 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
- m. beneficiary and emergency contact information

In addition to Personal Information contained in the examples listed above, the Company may also collect identification information such as name, home address, telephone number, personal email address, date of birth, employee identification number and marital status, and any other information which may be disclosed by the Employee.

As a general rule, the Company collects Personal Information directly from the Employee. In most circumstances where the Personal Information that PetroChina Canada collects about an Employee is held by a third party, the Company will obtain the Employee's consent before it seeks out this information from such sources (such permission may be given directly by the Employee, or implied from his or her actions), or otherwise in accordance with law.

From time to time, the Company may utilize the services of third parties (including members from other departments within the Company) in its business and may also receive or otherwise obtain Personal Information collected by those third parties in the course of the performance of their services for the Company or otherwise. Where this is the case, the Company will take reasonable steps to ensure that such third parties have represented to PetroChina Canada that they have the right to disclose the Employee's Personal Information to the Company.

Where permitted or required by applicable law or regulatory requirements, the Company may collect information about an Employee without his or her knowledge or consent.

B. HOW WE USE PERSONAL INFORMATION

The Personal Information collected is used and disclosed for the Company's business or legal purposes, including (but not limited to) establishing, managing or terminating your employment relationship with the Company. Such uses include:

- a. determining eligibility for initial employment, including the verification of references and qualifications;
- b. administering pay and benefits;
- c. processing Employee work-related claims (e.g. worker compensation, insurance claims, disability claims. etc.);
- d. establishing training and/or development requirements;
- e. conducting performance reviews and determining performance requirements;
- f. assessing qualifications for a particular job or task;
- g. gathering evidence for disciplinary action or termination;
- h. establishing a contact point in the event of an emergency (such as next of kin);
- i. complying with applicable labour or employment statutes;
- j. compiling staff telephone lists and directories;
- k. ensuring the security of Company-held information; and
- l. such other business or legal purposes as are reasonably required by the Company

C. SURVEILLANCE AND MONITORING

The work output of Employees, whether in paper record, computer files, or in any other storage format belongs to the Company, and that work output, whether it is stored electronically, on paper or in any other format, and the tools used to generate that work product, are always subject to review and monitoring by the Company.

In the course of conducting the Company's business, PetroChina Canada may monitor Employee activities and its property. For example, some of the Company's locations may be equipped with security cameras. These cameras are generally in high risk areas or work sites. Where in use, security cameras are there for the protection of Employees and third parties, and to protect against theft, vandalism and damage to the Company's goods and property. Generally, videos from such cameras are routinely destroyed and not shared with third parties unless there is suspicion of a crime or where a health and safety incident may have occurred, in which case they may be turned over to the police or other appropriate government agency or authority. The Company reserves the right to monitor all Employees' computer and e-mail use.

This section is not meant to suggest that all Employees will in fact be monitored or their actions subject to constant surveillance. It is meant to bring Employees' attention to the fact that such monitoring may occur

and may result in the collection of Personal Information from Employees (e.g. through their use of the Company's resources). When using the Company's equipment or resources, Employees should not have any expectation of privacy with respect to their use of such equipment or resources.

D. DISCLOSURE OF PERSONAL INFORMATION

The Company may use and disclose an Employee's Personal Information:

- a. for the purposes described in this Policy; or
- b. for any additional purposes that the Company may advise an Employee of and where the Employee's consent is required by law the Company must obtain such consent in respect of the use or disclosure of his or her Personal Information.

The Company may use or disclose an Employee's Personal Information without his or her knowledge or consent where the Company is permitted or required by applicable law or regulatory requirements to do so.

The Company will share Employees' Personal Information with its employees, contractors, consultants and other parties (including members from other departments of the Company) who require such information to assist PetroChina Canada with administering its relationship with the Employee, including third parties that provide services to the Company or on the Company's behalf and third parties that collaborate with the Company in the provision of services to the Employee and third parties whose services PetroChina Canada uses to perform its services.

Further, Employees' Personal Information may be disclosed:

- a. as permitted or required by applicable law or regulatory requirements;
- b. to comply with valid legal processes such as search warrants, subpoenas or court orders;
- c. as part of the Company's regular reporting activities;
- d. to protect the rights and property of the Company;
- e. during emergency situations or where necessary to protect the safety of a person or group of persons;
- f. where the Personal Information is publicly available; or
- g. with the Employee's consent where such consent is required by law.

E. KNOWLEDGE AND CONSENT

Where an Employee has consented to the Company collecting, using or disclosing his or her Personal Information, the Employee may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw his or her consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to the Privacy Officer.

F. HOW PERSONAL INFORMATION IS PROTECTED

PetroChina Canada makes commercially reasonable efforts to ensure that Personal Information collected is protected against loss, theft and unauthorized access. This protection applies in relation to information stored

in both electronic and hard copy form. Access to Personal Information is restricted to selected employees or representatives. In addition, PetroChina Canada employs generally accepted information security techniques, such as firewalls, access control procedures and cryptography, to protect Personal Information against loss and unauthorized access. PetroChina Canada will communicate the importance of maintaining the confidentiality of Personal Information to any third parties contracted to store or destroy Personal Information and to other agents. PetroChina Canada will use care to prevent unauthorized access when destroying or disposing of Personal Information.

G. RETENTION AND STORAGE OF PERSONAL INFORMATION

PetroChina Canada retains Personal Information for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws, and consent to such purposes(s) remains valid after termination of the relationship with the individual.

H. CORRECTING OR UPDATING PERSONAL INFORMATION

It is important that the information contained in the Company's records is both accurate and current. If an Employee's Personal Information happens to change during the course of his or her employment, it is the responsibility of the Employee to keep the Company informed of such changes.

I. EMPLOYEE ACCESS TO THEIR PERSONAL INFORMATION

An Employee may ask to see the Personal Information which the Company holds about him or her. If an Employee wants to review, verify or correct his or her Personal Information, he or she should contact the Privacy Officer using the contact information set out below. Please note that any such communication must be in writing.

When an Employee requests access to his or her Personal Information, the Privacy Officer may request specific information from him or her to enable the Privacy Officer to confirm the identity and right to access, as well as to search for and provide the Employee with the Personal Information that the Company holds about him or her. If an Employee requires assistance in preparing such a request, please contact the Privacy Officer.

An Employee's right to access the Personal Information that the Company holds about him or her is not absolute. There are instances where applicable law or regulatory requirements allow or require the Company to refuse to provide some or all of the Personal Information that it holds about an Employee. In addition, the Personal Information may have been destroyed, erased or made anonymous in accordance with the Company's policies.

If the Company cannot provide an Employee with access to his or her Personal Information, the Privacy Officer will endeavour to inform such Employee of the reasons why, subject to any legal or regulatory restrictions.

J. CONTACTING PETROCHINA CANADA'S PRIVACY OFFICER

Any questions about this Policy, requests for access and correction of Personal Information, or if there is a reason to believe that PetroChina Canada may have failed to adhere to this Policy can be submitted to the Privacy Officer at privacyofficer@PetroChinaCanada.com.

K. BREACH OF THE PRIVACY POLICYK.

Any violation of this Policy and any privacy breaches should be promptly reported to the Privacy Officer by email to privacyofficer@PetroChinaCanada.com. Upon receipt of the complaint or notice of a breach, the following procedures will take place:

- a. The Privacy Officer will verify and document the content of the complaint or breach and may ask for further information at that time.
- b. The Privacy Officer will decide how to proceed with the complaint or breach and develop steps to investigate as required. The Privacy Officer will proceed with the investigation and will take appropriate measures, as necessary, including:
 - i. notifying the Office of the Privacy Commissioner of Alberta of the details of the breach, if required, in accordance with Section 34.1(1) of the Personal Information and Protection of Privacy Act, and any other relevant Provincial or Federal legislation;
 - ii. notifying the affected individuals (in the event of a breach); and
 - iii. amending Company policies and practices.
- c. The results of the investigation and measures taken to address the violation will be reported back to the complainant. (Note: In order to facilitate this final step, the Privacy Officer will be required to collect the complainant's contact information. The collection of such information shall be in accordance with this Policy.)

Any interpretation associated with this Policy will be made by the Privacy Officer. This Policy includes examples but is not intended to be restricted in its application to such examples.

This Policy does not create or confer upon any individual any rights, or impose upon the Company any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Policy and Canada's federal and provincial privacy laws, as applicable, this Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

3. POLICY AUTHORITY

The content of this Policy was approved by the Board of Directors as of December 11, 2019, and the President & CEO approved the minor changes of Revision 2 as of September 16, 2022.

4. POLICY COMPLIANCE

A failure to comply with this Policy may result in the Company exposing itself to risks beyond what are acceptable to the Board of Directors and for which the Company is not insured.

If an Employee wilfully or intentionally violates this Policy, the Company may take disciplinary action, up to and including termination and the Company may exercise any legal rights to seek redress against the violator.

Any violation of this Policy should be promptly reported to HR, Director and Legal, Director.
Any deviation from this Policy must be approved by the Board of Director.

5. CONTINUOUS IMPROVEMENT

PetroChina Canada is committed to the continuous improvement of this, and all aspects of their business.
This document shall be reviewed every 3 years to ensure quality.