



Privacy Protection for Individuals

Intent

This Keyera Guideline describes our commitment to protecting the privacy of individuals' personal information such as our employees, consultants, customers, community residents, landowners and business partners. The objective is to promote responsible practices in the management of personal information. For the purposes of this Guideline, "personal information" is defined as information about an identifiable individual but does not include business contact information normally found on a business card such as job title, business telephone numbers, business address and e-mail.

Principles

Accountability

Keyera is responsible for personal information under its control and has designated a Privacy Officer who is accountable for the company's compliance with the following principles.

Identifying Purposes for Collection of Personal Information

The purposes for which personal information is collected will be identified at or before the time the information is collected.

Obtaining Consent for Collection, Use or Disclose of Personal Information

The knowledge and consent of an individual are required for the collection, use or disclosure of personal information, except where inappropriate. Consent may be provided orally or in writing (including electronically) and can be expressed, implied or consented to by not opting out.

Limiting Collection of Personal Information

The collection of personal information will be limited to that which is necessary for the purposes identified by the company. Keyera shall collect personal information by fair and lawful means.

Limiting Use, Disclosure, and Retention of Personal Information

Keyera will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information will only be retained as long as necessary for the fulfillment of those purposes and based upon operational/business requirements.

Accuracy of Personal Information

Keyera will endeavor to ensure that personal information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Security Safeguards

Keyera shall protect personal information by security safeguards appropriate to the sensitivity of the information.

Obtaining Access to Personal Information

Upon specific written request, Keyera will inform individuals of the existence, use, and disclosure of his or her personal information and shall give the individual access to view that information or will provide a copy within 30 business days, as long as the request is reasonable and exceptions do not exist that prevent access. A reasonable fee may be charged to the individual when responding to complex requests and the individual will be informed of the fee in advance. Individuals may challenge the accuracy and completeness of the information and request that it be amended as appropriate. Individuals can request information about or access to their own personal information by providing a written request to the Human Resources Advisor.

Challenging Compliance

Compliance concerns can be directed in writing to Keyera's Privacy Officer.

Practices

Why Is Personal Information Collected By Keyera?

- To manage, develop and retain a highly skilled, professional, and productive workforce that supports our business strategy and success. For example, we collect personal information about employees to make staffing and employee development decisions, to measure and reward performance, and to assess our ability to meet our business objectives.
- To administer compensation, benefits, pension and departure programs. For example, we collect and record personal information to administer automatic payroll deposits, manage our benefits programs and report pay and compensation information as required by the government.
- To support the personal health and well-being of employees. For example, Keyera's third party service providers collect personal information when providing various health services to employees, such as medical assessment, return to work assistance and Employee & Family Assistance Program administration. Our service providers treat all health-related information collected in the course of providing these services as highly confidential.
- To provide a safe workplace/community as required by law and Keyera practices. For example, we keep records of safety incidents, emergency response plans, accident and injury reports and other related reports, in order to provide a safe work environment/community and comply with the law and regulatory bodies.
- To develop, enhance and market services to our customers and to manage Keyera's business operations.
- To meet legal and regulatory requirements. For example, we may collect information in response to a court order or to satisfy government reporting requirements.

When Is Personal Information Disclosed?

- To administer compensation, benefits, pension and departure programs, we disclose employee information to financial institutions, insurance providers, consultants, government departments and agencies such as the Canada Revenue Agency (CRA), or the employee's union.
- To administer personal health and well-being programs, we disclose personal information to the Workers' Compensation Board or health professionals.
- When required by law, or contractual obligations, we may disclose personal information to the employee's union, creditors, regulatory bodies, the Privacy Commissioner or the Canadian Human Rights Commission.

How Is Personal Information Protected?

In order to protect personal information and an individual's right to privacy, Keyera:

- has adopted an Information Sensitivity Classification Matrix which provides a framework for precautions to be taken with respect to managing information, including personal information;
- will not collect, use or disclose personal information for any purposes other than those for which it was collected, except with the individual's consent;
- will protect personal information with appropriate security safeguards;
- will protect the confidentiality of personal information when dealing with other individuals or with other companies;
- will strive to keep personal information as accurate and up-to-date as is necessary for the purposes identified above; and
- will respond to any written requests individuals may make for access to personal information. In certain exceptional situations, Keyera may not be able to provide access to all the personal information that it holds about an individual. If access cannot be provided, Keyera will provide the reason for denying access

Will Personal Information Be Stored in Other Jurisdictions?

There may be times when personal information collected by Keyera or its service providers may be processed, used, stored or accessed in a foreign jurisdiction, in which case it may become subject to the laws of those countries. This happens in part because Keyera carries on business and uses service providers who perform services or activities in various jurisdictions (including throughout Canada and the United States). In addition, because of developments in technology (including mobility services and the growth in the number of services utilizing cloud computing), there are situations where information is routed through or stored in off-site locations in other jurisdictions. For example, some of Keyera's technology platforms, including certain collaboration tools, analytical tools, messaging tools and cyber security tools utilize servers based in other jurisdictions.

In situations where personal information may be processed, used, stored or accessed in a foreign jurisdiction, Keyera takes reasonable steps to protect that information. These steps may include the following: reviewing the security and privacy practices of service providers; assessing the security features of technology platforms; utilizing encryption; and negotiating appropriate contractual terms regarding privacy matters with our service providers.

Consent

The acceptance of employment and applicable benefits by an employee or the use of Keyera services by a customer is viewed as implied consent for Keyera to collect, use, and disclose personal information about the individual for the purposes identified.

Individuals have the right to withdraw or vary consent, at any time, subject to legal or contractual restrictions and reasonable notice. This right protects individuals from having their personal information collected unnecessarily or for an unreasonable purpose.

Keyera views the purposes identified in this Guideline as reasonable and necessary to manage our business effectively. Therefore, Keyera will continue to collect, use and disclose personal information to the extent that is reasonable for meeting the purposes for which the information is collected.

Additional Information

If individuals have any questions or concerns about Keyera’s privacy practices, they can follow the steps below:

- Review the Keyera Privacy Protection Guideline.
- Employees can talk to their immediate supervisor or if additional guidance is required, talk to Human Resources.
- Contact Keyera’s Privacy Officer, who will act as an ombudsperson to review any formal concerns.
- Individuals may also choose to seek advice from the Office of Alberta’s Information and Privacy Commissioner. However, individuals are encouraged to initially follow the applicable steps outlined above.

Respecting an individual’s privacy is important at Keyera. This Keyera Privacy Guideline and supporting practices are designed to ensure that personal information will be protected.

Please contact Human Resources for further information and/or clarification regarding this Guideline.

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