



Title:	Privacy Policy	Effective:	June 15, 2020
Department:	Corporate Legal	Last Revised:	June 15, 2020
Country:	United States	Next Review:	June 15, 2023

PURPOSE

The Company is committed to protecting the privacy of its applicants, employees, contractors, customers, and suppliers. The purpose of this Privacy Policy is to inform applicants for employment with the Company, employees, and contractors with notice as to the categories of personal information that we collect in connection with their working relationship with Trimac and the purposes for which the categories of personal information shall be used. The Company will establish procedures to ensure that all Personal Information is collected, used, disclosed, and protected pursuant to this Policy.

POLICY STATEMENT

The Company recognizes the need to protect the Personal Information of applicants, employees, and contractors which the Company collects, uses, and discloses in connection with the working relationship with its employees and contractors (or the application for a working relationship) in a manner consistent with the laws of the states and countries in which we do business. In doing so, the Company will comply with applicable privacy laws. Capitalized terms are defined at the end of this Policy.

APPLICABILITY

This policy applies to all job applicants, current and former employees, and contractors of the Company who are natural persons.

POLICY STANDARDS

1.0 Accountability

The Company is responsible for Personal Information under its control or in its custody. The Company has designated a Privacy Officer who is accountable within the organization and responsible for compliance with this Policy and ensuring that the Policy complies with applicable privacy legislation.

2.0 Purposes of Collection, Use and Disclosure of Personal Information

The Company identifies the purposes for the collection, use, and disclosure of Personal Information at the time of collection and will notify individuals of these purposes, or if new purposes arise.

2.1 Personal Information Collected About Applicants, Employees and Contractors

Listed below are the categories of Personal Information which the Company may collect and process about applicants, employees, and contractors:

- Identifiers, including real name, alias, postal address, Unique Personal Identifiers, online identifier, internet protocol address, email address, social security number, driver’s license number, passport number or other similar identifiers, signature, physical characteristics or description.

- Characteristics of protected classifications under certain state or federal law, including the following: race, skin color, national origin, religion (includes religious dress and grooming practices), sex/gender (includes pregnancy, childbirth, breastfeeding and/or related medical conditions), gender identity, gender expression, sexual orientation, marital status, medical condition (such as genetic characteristics, cancer or a record or history of cancer), disability (such as mental and physical), military or veteran status, request for family care leave, request for leave for an employee's own serious health condition, request for pregnancy disability leave, and age
- Geolocation data (see Section 2.6, In-Vehicle Cameras, Automated Vehicle Location Technology, below)
- Audio, electronic and visual information recorded by cameras in all Company trucks that record video and audio and electronic and visual information recorded by cameras at Company facilities (see Section 2.5, Monitoring of Our Facilities and Equipment, and Section 2.6, In-Vehicle Cameras, Automated Vehicle Location Technology, below)
- Professional or employment-related information, including job related data, maintained as part of the employment/ working relationship that is present in: a job application or resume; an employment contract; a contractor agreement; a performance review; a disciplinary record; Education Information; photos; biometric data, including imagery of your fingerprint, face, and voice recordings; information from employee expenses; Internet or Other Electronic Network Activity Information; payroll and benefits related data; internal and external contact information; marital status; dependent status; qualifications and skills; career history; personal references; medical or health records or information; performance evaluations; work record; bank account information; pre-employment or pre-contract medical information; passport number; driver's license number; driver's abstract; violations or tickets issued by a government authority; attendance records; and testing results, or information captured from video, audio, systems, or other forms of monitoring or surveillance, as applicable.
- Inferences drawn from any of the Personal Information categories referenced above to create a profile about an employee reflecting the employee's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

2.2 Purposes for Collecting Applicant, Employee and Contractor Personal Information

The Company may collect, use or disclose applicant, employee, and contractor Personal Information for the following reasonable purposes of establishing, managing or terminating the employment or working relationship:

- Recruitment;
- To manage and develop the workforce;
- Determining eligibility for employment including verifying qualifications and references and monitoring eligibility to work in the U.S.;
- To monitor work-related licenses and credentials, including insurance;
- Assessing and managing performance including coaching, feedback and performance appraisals, implementing remedial measures or taking disciplinary action;

- Establishing training and development programs and the implementation of the same;
- Conducting investigations;
- To comply with our safety policies and safety culture as well as the safety requirements of our customers and applicable laws and regulations (see Section 2.3 for more information on Health and Safety);
- Monitoring for safety and security purposes;
- Administering compensation, benefits, pension, incentive and termination programs. This includes recording and processing eligibility of dependents, absence and leave monitoring, insurance and accident management. (Note that optional benefits require your opt-in consent);
- Pay and reimburse for expenses;
- Support personal health and well-being and to assist you in case of emergency;
- Administering our applications, software, and systems, including management and maintenance of computer systems and infrastructure. This is necessary to meet our legitimate interests in ensuring that our systems are secure and are fit for use;
- Ensuring business policies are adhered to e.g. policies covering security and use of internet, emails, computer systems to safeguard proprietary information and ensure compliance with policies;
- Statistical and analytical purposes to understand and improve worker satisfaction and performance;
- To create and maintain effective business relationships with our customers including: evaluating and entering into legitimate business opportunities; determining eligibility of personnel to perform services for certain customers at certain destinations; facilitating billing collections and customer services with our customers; to understand customer needs and preferences including enhancing and marketing products and services; and to meet customer service requirements and policies;
- Operational reasons, such as improving efficiency, training and quality control;
- Providing a safe and respectful workplace;
- Complying with court orders, applicable laws, regulations, policies and ordinances, including but not limited to, applicable labor and employment standards, internal company reporting obligations, health and safety requirements, requests for information from government agencies, human rights and tax; and
- Such other purposes as we may disclose to you from time to time.

2.3 Health and Safety

Safety is the Company's core value and is embedded within the Company's culture. In addition to complying with its own policies and procedures, the Company must also comply with government regulations and other legal requirements as well as the requirements of its customers. In order to comply with all its obligations, the Company collects Personal Information to the minimum extent necessary.

Should there be a safety incident, the Company is required to conduct investigations to obtain facts and evidence and, to the extent possible, determine the cause of the incident

in order to, among others, meet all of the Company's legal and regulatory obligations, evaluate and develop a plan of action in respect to the incident and mitigating and eliminating the safety risks associated with the incident, providing incident reports to customers, authorities, insurers and regulatory agencies, and providing information in response to court orders or requests from regulatory agencies.

The Company may collect and utilise the Personal Information related to health and safety to maintain and further the Company's commitment to safety. The Company may report various safety findings and statistics to its board of directors and/or shareholders, its customers and other third parties such as regulatory agencies, investigators, insurance providers and other related individuals. Whenever possible, such data will be anonymized, however, there may be instances when data anonymization is not possible or would not serve the purpose for which it is being used. In all cases, the Company will only use the minimum necessary Personal Information.

2.4 Methods of Collecting Personal Information

We collect most of this Personal Information directly from applicants, employees, and contractors in person, by telephone, text or email, and/or via our website and apps. However, we may also collect information:

- from publicly accessible sources;
- directly from a third party (e.g., recruiters, employment screening providers, credit reporting agencies, or customer due diligence providers);
- from a third party with your consent (e.g., your bank);
- from cookies on our website;
- via our IT systems, including:
 - door entry systems and reception logs;
 - automated monitoring of our facilities, and equipment, websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;
 - from our surveillance cameras used to monitor facilities and equipment;
 - from our in-vehicle cameras;
 - from our automated vehicle location technology;
 - any systems associated with our IT systems, as that may change from time to time.

2.5 Monitoring of Our Facilities and Equipment

In the course of conducting business, we may monitor facilities and equipment. Some of our locations are equipped with surveillance cameras areas. Surveillance cameras are there for the protection of applicants, employees, contractors, and third parties to protect against theft, vandalism, and damage, as well as for investigatory purposes. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime or a serious safety incident, in which case they may be disclosed to the appropriate policing or government authority or agency. Upon the occurrence of an incident, personnel reasonably required for any investigation, decision-making and action including, but not limited to safety personnel, legal, human resources, managers and

executive management may have access to such images, but only to the extent reasonably required under the circumstances. Where appropriate, these images may be used to evaluate safety practices and policies and for establishing, maintaining and terminating employment relationships. In no case will surveillance or monitoring be conducted in restrooms, locker rooms, or other designated changing areas.

The Company provides an e-mail system, voicemail system, access to the Internet, and other technology systems to assist employees in conducting Company business. All information, data, and messages created, received, sent, or stored in these systems are, at all times, the property of the Company. The foregoing systems are to be used solely for business-related purposes. The Company reserves the right to inspect any and all files, communications or documents stored in all areas of the Company's technology systems or network, including those assigned to individual employees or contractors, and those stored on any Company computer, in order to assure compliance with this and other Company policies. Accordingly, employees and contractors should have no expectation of privacy in any communication that is stored, received, or sent using the Company's equipment, and they should not use these systems for information they wish to keep private.

2.6 In-Vehicle Cameras, Automated Vehicle Location Technology

The Company has installed cameras in all Company trucks that are able to record video and audio. Depending on the camera system being used, functionality will vary. Information regarding the functionality of the particular camera system may be obtained from the appropriate safety manager. Conversations conducted in Company trucks are thus not confidential and employees and contractors should have no expectation of privacy in the activities that they conduct in Company trucks. To the extent that the camera collects Personal Information about applicants, employees, or contractors, the following are the purposes for the collection, use, and disclosure:

- to enhance safe motor vehicle operations;
- to document events and statements during the course of an incident or near miss;
- to provide impartial facts for investigation purposes;
- to protect drivers by corroborating their statements with video and audio data;
- to preserve visual and audio information for investigating purposes;
- for investigation of incidents which may be used for performance management up to and including dismissal or termination of employment or contract;
- for disclosure to insurers, policing authorities or third parties in the event of an incident or litigation; and
- during the normal course of business, to meet customer expectations including but not limited to coordinating with a customer's internal systems regarding pick up and delivery times.

3.0 Personal Information Shared with Third Parties

The Company shares your Personal Information with certain third parties, such as suppliers, service providers, advisers that perform certain services on our behalf or that receive services from us, and customers. We share your Personal Information with these third parties where it is necessary for them to perform their services or for us to provide our services to them. Specifically, the Company:

- collects and discloses personal information to third parties, such as payroll service providers, benefit service providers, actuaries, pension trustees, trustees, various government departments, including related to workers' compensation, as required by law, in order to administer compensation, benefits, pension, and other retirement benefits, severance, and other monetary benefits of employment;
- may disclose Personal Information to consultants who assist the Company in developing safety, training, or coaching programs;
- may disclose the information to the Company's customers to evaluate business opportunities, including but not limited to divesting assets, evaluating educational and professional qualifications and the experience of the Company's personnel, and complying with customer requirements and legal obligations when providing services to such customer;
- may collect, use, and disclose personal information to third parties who are performing medical assessments or administering alcohol or drug tests. The results from such assessments or tests may be disclosed to customers to evaluate and determine personnel eligibility to provide services to a certain customer regarding a certain product and/or at a certain location, as well as to meet legal and regulatory requirements;
- may disclose this information to outside consultants who assist us in administering compliance with various Company policies, appropriate government departments, or as otherwise required by law;
- may from time-to-time work with a third party to assess and analyze the Company's safety records, programs and policies and develop or revise policies and educational training programs and materials.

The Company will only share your Personal Information with third parties for the purposes identified herein in accordance with the Policy, or with your consent. The Company will endeavor to obtain assurances from each third party with whom we share your Personal Information for purposes of maintaining our relationship with you that it will safeguard your Personal Information consistently with this Policy and will notify the Company if it makes a determination it can no longer meet this obligation. If we have knowledge that a third party is using or disclosing Personal Information in a manner contrary to this Policy, we will take reasonable steps to prevent or stop the use or disclosure.

We may also disclose your Personal Information to third parties if necessary, to comply with legal obligations, for example, to cooperate with regulatory authorities, law enforcement bodies, or courts, to meet contractual requirements or if we believe that disclosure is necessary to protect our rights or those of a third party.

4.0 Consent

The Company seeks consent in various ways depending on the circumstances. An individual may withdraw consent at any time, subject to legal or contractual restrictions. In accordance with Section 3.0, the Company compiles and discloses certain information about employees or contractors to a limited number of third parties, in such cases, by continuing to be employed or by participating in the program, employees are deemed to consent to such collection, use, or disclosure.

Subject to its legal rights and obligations, the Company may, from time to time, seek from employees and contractors express consent to collect, use, or disclose Personal Information for a new purpose.

In the event that an applicant, employee, or contractor wishes to withdraw his/her consent to a particular use or disclosure of his/her Personal Information, they should contact the Privacy Officer.

Unless an individual provides explicit consent to do so, the Company will not sell, rent, or lease Personal Information to third parties unless otherwise provided for in this Policy.

5.0 Limiting Collection, Use, Disclosure and Retention

The Company limits the amount and type of Personal Information collected to that which is necessary to fulfill the identified purposes in this Policy. We have retention schedules for documents containing Personal Information. The length of time we retain your Personal Information depends on the status of our relationship with you and the requirements of applicable law. We will retain your Personal Information for as long as your employment with us lasts, and for a certain period after your employment with us has ended. To determine that period, we take into account our legal and regulatory obligations (such as financial reporting obligations and equal opportunity or anti-discrimination reporting obligations) and whether we may need to retain personal information to resolve disputes, make and defend legal claims, conduct audits, pursue legitimate business purposes and/or enforce our agreements.

6.0 Accuracy

The Company endeavours to keep Personal Information in our custody or control accurate, complete and up to date. Applicants, employees and contractors should ensure that the information they provide to the Company is current and accurate.

7.0 Security

The Company uses reasonable security practices and procedures to secure your Personal Information against loss or theft, misuse, and unauthorized access, collection, disclosure, copying, use or modification. The Company uses security safeguards appropriate to the sensitivity of the Personal Information that has been collected, the amount, distribution, format of the Personal Information, and the method of storage. Personal Information about prospective applicants, including verifying reference information given by the applicant, is stored in an electronic applicant tracking system accessible only by the recruiting team, safety team, and hiring managers.

Access to our systems that store your Personal Information is restricted, including by means of encryption or a user ID and password that are issued only to authorized personnel. In turn, you need to prevent unauthorized access to your Personal Information by selecting and protecting your password appropriately and limiting access to your computer and browser by signing off after you have accessed your Personal Information. We continually test our systems and follow top industry standards for information security. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

From time to time, we may store your Personal Information outside of the United States, where it may be subject to the lawful access requirements of the jurisdiction in which it is being held.

8.0 Access and Correction Requests, Rights Over Personal Information

Applicants, employees, and contractors have the right to make access requests for their Personal Information in the custody or control of the Company. The Company will comply with its obligations under applicable privacy legislation. Individuals may also make correction requests.

Subject to applicable law, applicants, employees, and contractors have other rights in relation to their Personal Information, including the right to object to the Company's processing of their Personal Information in some of the circumstances. If consent has been given to any use of Personal Information, that consent can be withdrawn at any time. If consent is withdrawn, however, in certain circumstances, the Company may not be able to fulfill its contractual and employment-related obligations to the applicant, employee, or contractor. You have the right to not be discriminated against by the Company because you exercised any of your rights under applicable privacy laws.

9.0 Compliance

Should any individual have questions or concerns about the policies or practices relating to the handling of their Personal Information, all inquiries should be addressed to the applicable human resources business partner or to the Privacy Officer, as follows: privacyofficer@trimac.com.

10.0 Changes to this Privacy Policy

We may amend this Policy from time to time. If we make any material changes in the way we collect or use your Personal Information, we will notify you by email at the email address you have provided.

DEFINITIONS

Applicant - any person who has submitted his or her candidacy for a job position with the Company.

Collection – The act of gathering or acquiring or obtaining Personal Information from any source.

Company – Trimac Transportation Inc., Trimac Transportation Services (Western) Inc., and their respective affiliated and subsidiary companies.

Disclose – Making Personal Information available to others outside the Company.

Education Information - Includes information about an applicant's or employee's educational background, such as education records that are not publicly available

Internet or Other Electronic Network Activity Information - Includes browsing history, search history, application access location and information regarding an employee's interaction with an internet website, application or advertisement, time and geolocation data related to use of an internet website, application or physical access to a Company office location

Personal Information – Any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, and as detailed in section 2.1.

Unique Personal Identifier - A persistent identifier that can be used to recognize an employee, or a device that is linked to an employee, over time and across different services, including, but not limited to, a device identifier; an Internet Protocol address; cookies, beacons, pixel tags, or similar technology; unique pseudonym, or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers.

Use – Means the treatment and handling of Personal Information by the Company.

REFERENCES

Drug and Alcohol Use Policy

Minimum Hiring Criteria Drivers Policy

Social Media – Employees Policy

GPS/Automated Vehicle Location Technology Policy

All Company policies where Personal Information may be prepared, collected, or used