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<b>Title:</b>	<b>Privacy Policy</b>	<b>Effective:</b>	March 9, 2009
<b>Department:</b>	<b>Corporate Legal</b>	<b>Last Revised:</b>	January 20, 2020
<b>Country:</b>	<b>Canada</b>	<b>Next Review:</b>	January 20, 2023

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**PURPOSE**

The Company is committed to protecting the privacy of its employees, contractors, customers and suppliers. Accordingly, it has established this Policy to provide high level notice to individuals of the purposes of the collection, use and disclosure of their Personal Information. The Company will establish procedures to ensure that all Personal Information is collected, used and disclosed and protected pursuant to this Policy.

**POLICY STATEMENT**

The Company recognizes the need to protect the Personal Information of employees, contractors, customers and suppliers. In doing so, the Company will comply with the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) and any other privacy legislation that applies to the Company.

**APPLICABILITY**

This policy applies to all Canadian employees and contractors of the Company.

**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 Customers and Suppliers**

Some of the purposes for which we collect, use and disclose customer and supplier Personal Information may include, but is not limited to:

- creating and maintaining effective business relationships with our customers;
- facilitating billing, collections and customer services with our customers; to understand customer needs and preferences including enhancing and marketing products and services;
- complying with Company safety policies and safety culture, as well as the safety requirements of our customers and applicable laws and regulations;
- complying with customer requirements and policies;
- protecting and managing Company assets;
- evaluating and entering into legitimate business opportunities; and
- meeting all legal and regulatory requirements.

## 2.2 Employees and Contractors

Employee and contractor Personal Information the Company may collect, use, or disclose includes, but is not limited to:

- employee or contractor name;
- residential address;
- age;
- gender;
- marital and dependent status;
- medical or health records, including drug and alcohol testing results;
- bank account information;
- identification numbers, including Social Insurance, passport, and driver's licence numbers;
- driver's abstract; violations or tickets issued by a government authority
- qualifications, skills, career history and references; and
- performance evaluations, attendance records, and other work records.

The Company may collect, use or disclose employee and contractor Personal Information for the reasonable purposes of establishing, managing or terminating the employment or working relationship, including but not limited to, the following purposes:

- determining eligibility for employment including verifying qualifications and references;
- assessing and managing performance including coaching, implementing remedial measures or taking disciplinary action;
- determining eligibility of personnel to perform services for certain customers, at certain destinations;
- establishing training and development programs and the implementation of the same;
- conducting work related investigations;
- monitoring for safety and security purposes;
- administering compensation, benefits, pension, incentive and termination programs;
- supporting personal health and well-being;
- providing a safe and respectful workplace; and
- complying with court orders, applicable laws, regulations, policies and ordinances, including but not limited to, applicable labour and employment standards, human rights and tax.

## 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 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 the Company's legal and regulatory obligations, evaluate and develop a plan of action in respect to the incident to mitigate and eliminate the safety risks associated with the incident, provide incident reports to customers, authorities, insurers and regulatory agencies, and provide information in response to court orders or requests from regulatory agencies.

The Company may collect and use 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.

Additionally, the Company may from time-to-time work with a third party to assess and analyze the Company's safety record, programs, and policies. Such third party may then use the information to assist the Company with maintaining, developing or revising policies, and educational training programs and materials. 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 any case, only those third parties engaged by the Company will have access to any such Personal Information.

## **2.4 Monitoring of Company Facilities and Equipment**

In the course of conducting business, the Company may monitor its facilities and equipment. Some of our locations are equipped with surveillance cameras in high-risk areas. Surveillance cameras are there for the protection of employees, contractors and third parties, to protect against theft, vandalism and damage, as well as for investigatory purposes.

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, or 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.

## **2.5 In-Vehicle Cameras, Automated Vehicle Location Technology**

The Company has installed cameras in all trucks that record video and audio. The outward-facing camera cannot be disabled. The camera records video and/or audio throughout the time the vehicle is being operated. To the extent that the automated vehicle location technology collects Personal Information about employees or contractors, the purposes for the collection, use and disclosure include the following:

- enhancing safe motor vehicle operations;
- documenting events and statements during the course of an incident or near miss;
- providing impartial facts for investigation purposes;
- protecting drivers by corroborating their statements with video and audio data;
- preserving visual and audio information for investigating purposes;
- investigating incidents, which may be used for performance management up to and including dismissal or termination of employment or contract;
- disclosure by Risk and Insurance department, or legal counsel 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 Consent**

The Company seeks consent in various ways depending on the circumstances, such as on application form, a check-off box or collecting oral consent. Where consent was required to have been provided, an individual may withdraw consent in writing at any time, subject to legal or contractual restrictions. Further, under PIPEDA there are circumstances under which we may collect, use or disclose Personal Information without knowledge or consent of the individual.

### **4.0 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. We have retention schedules for documents containing Personal Information. Unless an individual provides explicit consent to do so, the Company will not sell, rent, or lease Personal Information to third parties.

### **5.0 Accuracy**

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

### **6.0 Security**

The Company takes reasonable steps to secure all Personal Information against loss or theft, 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.

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

### **7.0 Access and Correction Requests**

Individuals 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 also have the right to make correction requests if their Personal Information is shown to be inaccurate and the Company will correct the Personal Information as required. If no correction is required to be made, the file will be annotated to indicate that a correction request was made and not implemented.

### **8.0 Compliance**

Anyone with questions or concerns about the policies or practices relating to the handling of their Personal Information is encouraged to bring these issues to the attention of the Privacy Officer at [privacyofficer@trimac.com](mailto:privacyofficer@trimac.com) and/or a Human Resource Business Partner.

## **DEFINITIONS**

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

**Company** – Trimac Transportation Services Inc., Trimac Management Services Limited Partnership, and their respective affiliated and subsidiary companies.

**Business Contact Information** – Information that enables an individual to be contacted at a place of business including their name, position, business telephone number, business address, business email and business fax number. It does not include their personal contact information.

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

**Personal Information** – Any information relating to an identifiable individual but does not include Business Contact Information or Work Product Information. Personal Information may include, but is not limited to: name, residential address, age, gender, identification numbers, marital status, dependent status, qualifications and skills, career history, medical or health records, bank account information, driver’s license number, driver’s abstract, violations or tickets issued by a government authority, attendance records, and testing results.

**Use** – means the treatment and handling of Personal Information by and within the Company.

**Work Product Information** – Information related to an individual’s employment or business, prepared or collected as part of their employment or business responsibilities.

## **REFERENCES**

Drug and Alcohol Use Policy

Minimum Hiring Criteria Drivers Policy

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