



**Compagnie Alpek Polyester  
Canada**

**Employee Privacy Policy**

January, 2023

## Employee Privacy Policy – Alpek Polyester Canada

Name of Document	POL-10224
Responsible of the application of the policy	HR Services
Effective Date	January 1, 2023

### INTRODUCTION

Compagnie Alpek Polyester Canada (the “**Company**”) is committed to the privacy and security of personal information and to respecting the privacy of individuals. The Company recognizes the need of employees for the appropriate management and protection of any personal information provided. It is the Company’s policy to protect and respect the privacy of personal information it receives in accordance with applicable privacy laws.

This employee privacy policy (the “**Policy**”) applies to anyone who seeks to be employed by the Company and all employees or former employees of the Company. The Policy describes some of the personal information that we may collect from or about you, how we use such information and to whom we disclose it.

### PERSONAL INFORMATION

Personal information may include:

- Name, gender, date of birth.
- Contact information both at work and at home.
- Résumés and/or applications, references and interview notes.
- Residency and work permit status, military status, nationality and passport information.
- Social security or other taxpayer identification number, banking details.
- Sick pay, pensions, insurance and other benefits information (including the gender, age, nationality and passport information for any spouse, minor children or other eligible dependents and beneficiaries).
- Date of hire, date(s) of promotions(s), work history, technical skills, educational background, professional certifications and registrations, language capabilities, training courses attended.
- Photograph, physical limitations and special needs.
- Records of work absences, vacation entitlement and requests, salary history and expectations, performance appraisals, letters of appreciation and recommendation, and disciplinary and grievance procedures (including monitoring compliance with and enforcing the Company policies).
- Where permitted by law and proportionate in view of the function to be carried out by an employee or prospective employee, the results of credit and criminal background checks.
- Information required to comply with laws, the requests and directions of law enforcement authorities or court orders.
- Acknowledgements regarding the Company policies including ethics and/or conflicts of interest policies and computer and other corporate resource usage policies.
- Information captured on security systems, key card entry systems.
- Date of resignation or termination, reason for resignation or termination, information relating to administering termination of employment (e.g. references).

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### ACCURACY

The Company is committed to maintaining the accuracy, confidentiality and security of employees' personal information and will make every reasonable effort to ensure that the personal information it collects, and uses is accurate and complete. Individuals providing personal information will have the opportunity to review and correct their personal information, and upon written request by an individual to whom the information relates, the organization will modify the information as required. It is important that the information contained in our records is both accurate and current. If your personal information changes during the course of our relationship, please keep us informed of such changes.

### COLLECTION

The Company collects personal information about employees for the following purposes relating to the ongoing employment relationship:

- During the hiring process, to determine suitability and to conduct due diligence.
- Upon hiring, to enter employees into human resources information systems to allow for payroll and human resources administration.
- To enroll employees in employment benefit and pension plans, to administer these plans on an ongoing basis and to determine eligibility for benefits or support under various programs and policies.
- To monitor ongoing performance, evaluation or complaint.
- To monitor adherence to the Company policies, procedures and guidelines and comply with applicable laws.
- To administer termination of employment and provide and maintain references.
- To manage all aspects of an employee's employment relationship, including, but not limited to, payroll, benefits, corporate travel and other reimbursable expenses, development and training, absence monitoring, performance appraisal, disciplinary and grievance processes and other general administrative and human resource related processes.
- To identify customer service issues, to provide for employee training, and to confirm transactions.
- In the unlikely event that the Company were to be engaged in litigation with an employee or former employee, personal information may be collected from various sources and used to enable the Company to prepare and instruct counsel and present its case.
- For other similar or related purposes that are reasonably necessary for the proper management of the Company, to maintain or manage the employer-employee relationship or for security reasons.
- For the purpose of meeting its legal responsibilities pursuant to, among other things, applicable Workers Compensation and Occupational Health and Safety legislation.

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If the Company wishes to collect or use personal information regarding an employee for a purpose other than any of those listed above, it will seek the employee's consent for such collection or use. The Company will make all reasonable efforts to fully inform such individuals about the planned use and will limit the collection and use of personal information to that required valid business purposes or to comply with legislation.

### DISCLOSURE OF PERSONAL INFORMATION

The Company will make all reasonable efforts to inform you about the planned use and disclosure of the personal information it collects. The Company limits the use and disclosure of personal information as reasonably necessary for the purposes stated above. The Company will only disclose your personal information to third parties where required by law or to employees, contractors, designated agents, or third-party service providers who require it to assist the Company with administering the employment relationship with you, including third-party service providers who provide services to the Company.

The Company will use reasonable commercial efforts, including, where appropriate, contractual obligations, to ensure that such third parties do not use employee personal information for their own purposes and that such information is kept secure while in the possession of such third party.

### NOTIFICATION AND CONSENT

An employee may, at any time, subject to certain restrictions, withdraw consent. All communications with respect to such withdrawal of consent should be sent to [grh@alpekpolyester.com](mailto:grh@alpekpolyester.com)

### TRANSFER OF PERSONAL INFORMATION

The Company may transfer personal information about employees to affiliates or third parties, as necessary for the purposes stated above and where it is required or permitted by law. In such circumstances, the information in the file may be communicated outside Quebec. The Company has taken appropriate technical, organizational, and legal steps to secure this information. In conformity with the applicable legislation, the Company will not otherwise communicate to third parties personal information contained in the file of a current or former employee unless the latter has consented in writing to the communication.

### PROTECTION OF PERSONAL INFORMATION

The Company will store personal information in such a way as to prevent the unauthorized collection, access, use, disclosure, or disposal of the personal information. The Company endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of personal information. These safeguards are designed to protect personal information from loss and unauthorized access, copying, use, modification or disclosure.

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Although the Company takes reasonable steps to protect information, it is unfortunately not possible to guarantee the security of personal information, particularly when it is stored or transferred electronically. The Company will comply with applicable laws to notify you of any unauthorized access, use, or collection of your personal information.

You must immediately notify the Company if you become aware of any suspected or actual unauthorized collection, use, or disclosure of personal information.

### RETENTION

Personal information collected by the Company will be retained as long as required to fulfill the purpose for which it was collected. Once the personal information is no longer required to fulfill the purposes for which it was collected and is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous.

### ACCESS

The Company promotes an individual's right of access to personal information about them. The Company will provide you access to your personal information upon request. Access is according to established procedures.

**Note:** Supervision may be required during access for the purpose of ensuring confidentiality and security. Access requests should be made at: [grh@alpekpolyester.com](mailto:grh@alpekpolyester.com)

### EMPLOYEE PRIVACY OBLIGATION

All Company employees must comply with applicable privacy laws and are required to be familiar with and comply with this Policy. Employees must only collect, use and disclose personal information about other individuals, including other employees, as properly authorized. Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment.

### CONTACT

For further information, to submit a request for access to the personal information that we maintain about you or to correct such information, please send a written request to [grh@alpekpolyester.com](mailto:grh@alpekpolyester.com).

Any concern, inquiry or request related to your personal information should be directed to [grh@alpekpolyester.com](mailto:grh@alpekpolyester.com).

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### POLICY REVIEW

The Company may amend and/or review this Policy from time to time and will provide you with a new policy when any updates are made.

This Policy shall be dated and effective as of January 1<sup>st</sup>, 2023.

### ACKNOWLEDGEMENT FORM AND CONSENT

I, \_\_\_\_\_ **[insert employee name]**, acknowledge that on \_\_\_\_\_ **[insert date]**, I received a copy of the Company Employee Privacy Policy and that I read and understood it, and that I knowingly and freely accept the principles set out herein. I consent to the collection, use and disclosure of my personal information as described above.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name