



Revision Resp.: **HR/People Development**
Control ID: **1811**
Prepared By: **HR/People Development**
Distribution: **Document Control, Employee Manual (Section 2)**

Application: **All Employees**
Effective: **01/01/2006**
Issued By: **Executive**

Revision: **05/24/18**
Approved By: **Executive**

General Statement:

Bison Transport is committed to protecting personal information. "Personal information" is any information about an identifiable individual. For a customer, personal information includes credit information and billing records. For an employee, personal information includes information found in employment files and performance appraisals.

Objective:

The objective of this policy is to ensure responsible and transparent practices in the management of personal information.

Background:

On January 1, 2001, the privacy provisions of the federal Personal Information Protection and Electronic Documents Act began regulating the collection, use, and disclosure of personal information in the Canadian private sector. Although Bison Transport has long been committed to protecting personal information, it was determined that a formal statement of principles concerning the requirements for the protection of personal information be developed. This policy is the result. This policy sets out the ways Bison Transport maintains the confidentiality, privacy, security, and accuracy of personal information.

Principles

The ten principles that form this policy are interrelated, and Bison Transport will adhere to the ten principles as a whole. This policy, then, applies to personal information about Bison Transport's customers and employees that is collected, used, or disclosed by Bison Transport. This policy applies to the management of personal information in any form, whether oral, written, or electronic. This policy does not, however, impose limits on the collection, use, or disclosure by Bison Transport of any information that is publicly available, including the name, title, business address, or telephone number of a customer or employee.

1. Accountability

Bison Transport is responsible for personal information under its control. Bison Transport's Privacy Official is accountable for Bison Transport's compliance with this policy.

Other individuals within Bison Transport may be delegated to act on behalf of Bison Transport's Privacy Official or to take responsibility for the day-to-day collection and processing of personal information.

Bison Transport is responsible for personal information in its possession or custody, including information that has been transferred to a third party for processing or other purposes related to Bison Transport's business and operations. Bison Transport will use contractual or other means to provide a comparable level of protection while the information is in the possession of the third party.

Bison Transport will implement policies and procedures to give effect to this policy, including:

- implementing procedures to protect personal information;



- establishing procedures to receive and respond to inquiries or complaints;
- training and communicating to employees about Bison Transport's policies and practices; and
- developing information to explain Bison Transport's policies and practices.

2. Identifying Purposes

Bison Transport will identify the purposes for which personal information is collected at or before the time the information is collected.

Generally, Bison Transport collects personal information to:

- establish and maintain responsible commercial relations with customers and employees;
- provide ongoing service to customers;
- understand customer needs;
- develop, enhance, market, or provide other services;
- manage and develop its business and operations, including employee and employment matters; and
- satisfy legal and regulatory requirements.

Upon request, persons collecting personal information will explain the above-identified purposes or refer the individual to a designated person within Bison Transport who will explain the purposes.

Unless required by law, Bison Transport will not use or disclose for any new purpose personal information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the customer or employee unless, the new purpose is permitted by law.

3. Consent

The knowledge and consent of a customer or employee are required for the collection, use, or disclosure of personal information, except where inappropriate.

In certain circumstances, personal information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical, or security reasons may make it impossible or impractical to seek consent. Bison Transport may also collect, use, and disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting the information, such as in the investigation of a breach of an agreement or a contravention of a federal or provincial law. Bison Transport may also collect, use, and disclose personal information without knowledge or consent if there is an emergency where the life, health, or security of an individual is threatened.

In obtaining consent, Bison Transport will use reasonable efforts to ensure that a customer or employee is advised of the identified purposes for which personal information will be used or disclosed. Generally, Bison Transport will seek consent to use and disclose personal information at the same time it collects the information. However, Bison Transport may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose. In determining the appropriate form of consent, Bison Transport will take into account the sensitivity of the personal information and the reasonable expectations of its customers and employees.



Bison Transport will require customers to consent to the collection, use, or disclosure of personal information as a condition of the supply of service only if the collection, use, or disclosure is required to fulfill the identified purposes. However, in general, the use of Bison Transport's services by a customer, or the acceptance of employment or benefits by an employee, constitutes implied consent for Bison Transport to collect, use, and disclose personal information for all identified purposes.

A customer or employee may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Customers and employees may contact Bison Transport for more information regarding the implications of withdrawing consent.

Employees shall not record any conversations between them and another party without mutual consent.

4. Limiting Collection

Bison Transport will limit the collection of personal information to that which is necessary for the purposes identified by Bison Transport. Bison Transport will collect personal information by fair and lawful means.

Bison Transport collects personal information primarily from its customers or employees. Bison Transport may also collect personal information from other sources with the employee's or potential employee's consent, including credit bureaus, employers or personal references, or other third parties that represent that they have the right to disclose the information.

5. Limiting Use, Disclosure, and Retention

Bison Transport 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. Bison Transport will retain personal information only as long as necessary for the fulfillment of those purposes.

In certain circumstances, personal information can be collected, used, or disclosed without the knowledge and consent of the individual (see Principle 3). In addition, Bison Transport may disclose a customer's personal information to:

- another transportation company for the efficient and effective provision of transportation services;
- another person for the development, enhancement, marketing, or provision of any of Bison Transport's services;
- a person who, in the reasonable judgment of Bison Transport, is seeking the information as an agent of the customer;
- a third party or parties, where the customer consents to such disclosure or disclosure is required by law;
- a person engaged by Bison Transport to perform functions on its behalf, such as research, data processing, payroll and legal services; or
- a person engaged by Bison Transport to evaluate a customer's credit status, and credit reporting agencies.

Bison Transport may disclose personal information about its employees:

- for normal personnel and benefits administration;



- in the context of providing references regarding current or former employees in response to requests from prospective employers; or
- where disclosure is required by law.

Only those Bison Transport employees who require access for business reasons are granted access to personal information about customers and employees.

Bison Transport will keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Bison Transport will maintain reasonable and systematic controls, schedules, and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.

Data collected for Web analytics purposes goes outside of Canada to Google servers and may be processed in any country where Google operates servers. Data may be subject to the governing legislation of that country, [for example the USA Patriot Act]. For further information about Google Analytics, please refer to the Google Analytics terms of service. The information is not disclosed to an external third party service provider

6. Accuracy

The personal information Bison Transport maintains will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Personal information used by Bison Transport will be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a customer or employee.

Bison Transport will update personal information about customers and employees as and when necessary to fulfill the identified purposes or upon notification by the individual.

7. Safeguards

Bison Transport will protect personal information through the use of security safeguards appropriate to the sensitivity of the information. The security safeguards will protect personal information against loss or theft, unauthorized access, disclosure, copying, use, or modification, regardless of the format in which it is held.

Bison Transport will make its employees aware of the importance of maintaining the confidentiality of personal information. Further, Bison Transport will use care in disposing of or destroying personal information, to prevent unauthorized parties from gaining access to the information.

8. Openness

Bison Transport will make readily available to customers and employees specific information about its policies and practices relating to its management of personal information.

9. Individual Access

Bison Transport will inform a customer or employee of the existence, use, and disclosure of his or her or its personal information upon request, and will give the individual access to that information. A customer or employee will be able to challenge the accuracy and completeness of the information and have it amended



as appropriate.

Upon request, Bison Transport will afford customers and employees a reasonable opportunity to review the personal information in the individual's file. Personal information will be provided in understandable form within a reasonable time and at a minimal or no cost to the individual. However, in certain situations, Bison Transport may not be able to provide access to all of the personal information it holds about a customer or employee. Bison Transport will provide the reasons for denying access.

Upon request, Bison Transport will provide an account of the use and disclosure of personal information and, where reasonably possible, will state the source of the information. In providing an account of disclosure, Bison Transport will provide a list of organizations to which it may have disclosed personal information about the individual when it is not possible to provide an actual list.

In order to safeguard personal information, a customer or employee may be required to provide sufficient identification information to permit Bison Transport to account for the existence, use, and disclosure of personal information and to authorize access to the individual's file. Any such information will be used only for this purpose.

Bison Transport will promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness will be noted in the individual's file. Where appropriate, Bison Transport will transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

A customer can obtain information or seek access to his or her or its individual files by contacting a designated representative at Bison Transport's head office. An employee can obtain information or seek access to his or her individual files by contacting his or her immediate supervisor within Bison Transport.

10. Challenging Compliance

A customer or employee will be able to address a challenge concerning compliance with the above principles to the Privacy Official, Linda Young, the person accountable for Bison Transport's compliance with this policy.

Bison Transport will maintain procedures for addressing and responding to all inquiries or complaints from its customers and employees about Bison Transport's handling of personal information. Bison Transport will inform its customers and employees about the existence of these procedures as well as the availability of complaint procedures.

Linda Young, the person accountable for Bison Transport's compliance with this policy, may seek external advice where appropriate before providing a final response to individual complaints.

Bison Transport will investigate all complaints concerning its compliance with this policy. If a complaint is found to be justified, Bison Transport will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A customer or employee will be informed of the outcome of the investigation regarding his or her or its complaint.

Contact Information:

For more information, inquiries, or complaints, please contact our Privacy Officer:

Linda Young
Bison Transport Inc.
1001 Sherwin Road



Privacy Policy

Winnipeg, Manitoba, R3H 0T8
Telephone: 1-204-833-0280

REVIEW/REVISION

Review/Revision Number	Reviewed By	Revisions	Date of Review/Revision
0	HR/People Development	New Policy	01/01/2006
1	HR	Standardized format	03/19/2010
2	HR	Formally added to Employee Manual	8/19/14
3	HR	Changed Privacy Officer to Linda Young	2/24/15
4	HR	Systems Manager added last paragraph under #5	9/20/16
5	HR	Added line about using recording devices with mutual consent	5/24/18