

UFA EMPLOYEE PRIVACY COMMITMENT

At United Farmers of Alberta Co-operative Limited and our subsidiaries (collectively "UFA"), we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Commitment describes the personal information that UFA collects from or about you (our employee), how we use, and to whom we disclose that information.

UFA has adopted a Privacy Policy, supported by a series of Privacy Commitments in order to address the specific privacy concerns of certain groupings of individuals. This Privacy Commitment applies to the personal information of all individuals who seek to be, are or were employed by UFA (collectively, an "**employee**"). For all other individuals, please see our *UFA External Privacy Commitment* available at <https://www.ufa.com/privacy-policy>. For our website, please see our *UFA Website Privacy Commitment* (available at <https://www.ufa.com/privacy-policy>).

If you are unsure of which Privacy Commitment applies to you, please contact our Privacy Officer for more information.

Privacy Commitment Effective for Canada

It is UFA's policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and / or an individual's right to privacy are different from one jurisdiction to another. This Privacy Commitment covers only those activities that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

This Privacy Commitment has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Commitment may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Commitment applies to you, please contact our Privacy Officer for more information.

What is Personal Information?

For the purposes of this Privacy Commitment, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications.

What Personal Information do we Collect?

We collect and maintain different types of personal information in respect of our employees, including the personal information contained in:

- resumes and/or applications;
- references and interview notes;
- photographs and videos;
- offer letters and employment contracts;
- payroll information, such as social insurance numbers and pay cheque deposit information;
- wage and benefit information;
- forms relating to the application for or changes to employee health and welfare benefits, including, short and long term disability, life insurance, optional life insurance, accidental death & dismemberment, medical and dental care; and
- beneficiary and emergency contact information.

In addition to the information contained in the examples listed above, we may also collect identification information such as name, home address, telephone, personal email address, date of birth, employee identification number and marital status, specific medical information that you provide to us and any other information that is voluntarily disclosed by you.

As a general rule, UFA collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such source (such permission may be given directly by you, or implied from your actions).

From time to time, we may utilize the services of third parties in our business. We may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

Why Do We Collect Personal Information?

The personal information collected is used and disclosed for our business purposes, including to establish, manage or terminate your employment relationship with UFA. Such uses include:

- determining eligibility for initial employment, including the verification of references and qualifications;
- administering pay and benefits;
- processing employee work-related claims (e.g. workers' compensation or insurance claims);
- establishing training and/or development requirements;
- conducting performance reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- establishing a contact point in the event of an emergency (such as next of kin);
- complying with applicable labour or employment statutes;
- compiling directories and telephone lists;
- ensuring the security of UFA-held information; and
- such other purposes as reasonably required by UFA.

Work Product and Monitoring

The work product of UFA's employees, whether in paper record, computer files, or in any other storage format belongs to us, and that work product, whether it is stored electronically, on paper or in any other format, and the tools used to generate that work product, are always subject to review and monitoring by UFA.

In the course of conducting our business, we may monitor employee activities (including internet usage, and e-mail) and our property. This is not meant to suggest that all employees will in fact be monitored or their actions subject to surveillance. It is meant to bring to your attention that such monitoring *may* occur and *may* result in the collection of personal information from you. When using UFA equipment or resources, employees should not have any expectation of privacy with respect to their use of such equipment or resources

How Do We Use and Disclose Your Personal Information?

We may use or disclose your personal information:

- for the purposes described in this Privacy Commitment; or
- for any additional purposes that we advise you of and where your consent is required by law we have obtained your consent.

We may use and disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

When Do We Disclose Your Personal Information?

We may share your personal information with our employees, contractors, consultants and other parties who require such information to assist us with managing our relationship with you, including: third parties that provide services to us; third parties that assist UFA in the provision of services to you; and, third parties who conduct businesses or services on our behalf (e.g. external payroll processing).

For example, UFA's affiliates and service providers may provide certain information technology and data processing services to us from time to time so that we may operate our business, and as result, your personal information may be collected, used, processed, stored or disclosed in Canada and the United States of America.

In addition, personal information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of, or the grant of a security interest in, all or a part of UFA or its affiliates through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations, and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Commitment, unless you consent otherwise.

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of UFA's regular reporting activities among its affiliated companies;
- to protect the rights and property of UFA;
- during emergency situations or where necessary to protect the safety of a person or group;
- where the personal information is publicly available; or
- where required by law, with your consent.

Notification and Consent

The privacy legislation does not generally require UFA to obtain your consent for the collection, use or disclosure of personal information for the purpose of establishing, managing or terminating your employment relationship. In addition, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

To the extent that your consent is required, we will assume, unless you advise us otherwise, that you have consented to UFA collecting, using and disclosing your personal information for the purposes stated above (including any other purposes stated or reasonably implied at the time such personal information was provided to us).

Where your consent was required for our collection, use or disclosure of your personal information, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

Please call us at our Integrity Hotline at 1-877-258-4605 or e-mail us at Integrity.Hotline@UFA.com.

How is Your Personal Information Protected?

UFA endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

The security of your personal information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of your employment, please keep us informed of such changes.

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

Access to Your Personal Information

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Privacy Officer. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with your personal information. If you require assistance in preparing your request, please contact our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

Inquiries or Concerns?

If you have any questions about this Privacy Commitment or concerns about how we manage your personal information, please contact our Privacy Officer by telephone, in writing or by e-mail. We will endeavor to answer

your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

Privacy Officer

We have appointed a Privacy Officer to oversee compliance with this Privacy Commitment. The contact information for our Privacy Officer is as follows:

Privacy Officer

Please call us at our Integrity Hotline at 1-877-258-4605 or e-mail us at Integrity.Hotline@UFA.com.

Revisions to this Privacy Commitment

UFA from time to time, may make changes to this Privacy Commitment to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this Privacy Commitment on our website <https://www.ufa.com/privacy-policy>, and we encourage you to refer back to it on a regular basis. This Privacy Commitment was last updated on November 12, 2020.

Interpretation of this Privacy Commitment

Any interpretation associated with this Privacy Commitment will be made by our Privacy Officer. This Privacy Commitment includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'.

This Privacy Commitment does not create or confer upon any individual any rights, or impose upon UFA any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Commitment and Canada's federal and provincial privacy laws, as applicable, this Privacy Commitment shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.