

## VIDEO SURVEILLANCE POLICY

### 1. PURPOSE

Western Stevedoring Company Limited and other associated companies (collectively, the “**Company**”) utilizes video surveillance at its premises and at third party premises where it operates, primarily to protect property and to ensure the safety and security of employees and visitors.

The Company recognizes that video surveillance involves the collection, use and disclosure of personal information and therefore impacts the privacy of individuals whose image or other information is collected through the use of such surveillance. The Company also recognizes the need to balance an individual’s right to privacy with the responsibility to protect the safety of persons and property and for purposes reasonably required by the Company for its business operations. The purpose of this Video Surveillance Policy (the “**Policy**”) is to clarify the Company’s rationale for and use of video surveillance. All use of such video surveillance will be undertaken in compliance with applicable federal and provincial privacy legislation (collectively, the “**Privacy Legislation**”).

### 2. NOTICE

Video cameras are not located in sensitive areas such as the break room, restrooms, or where individuals have a reasonable expectation of privacy. All video cameras are stationary and signage notifying individuals of the presence of video surveillance is posted at all site entrance locations.

### 3. COLLECTION, USE AND DISCLOSURE

Video surveillance will be in effect 24 hours per day, 7 days per week. The Company has determined that it is reasonably necessary to keep video surveillance systems on at all times in order to improve and maintain the security and safety of the premises. Surveillance systems will not be activated to collect sound but may collect an individual’s image which is considered that individual’s personal information. The surveillance system includes cameras installed that are both analog and digital IP having both fixed lens and pan/tilt/zoom functionality. Some digital IP cameras are also equipped with a safety feature that engages motion-tracking technology to allow for the collection of data regarding excessive vehicle speed for vehicles captured by the surveillance system. Where such technology is in use, and a vehicle is deemed by the system to be speeding, a notification will be sent to an authorized member of the management team.

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Video surveillance will be used by the Company for purposes permitted under the Privacy Legislation, including:

- To deter incidents of unauthorized access and trespassing;
- To more effectively respond to emergencies;
- To assist in the investigation of safety, harassment and other workplace incidents;
- To increase safety by deterring break-ins and potentially violent confrontations with intruders;
- To identify and address dangerous driving practices, including use of excessive speed;
- To improve operational efficiencies, including but not limited to, vessel loading/unloading, crane activity, traffic flow and gate congestion;
- To protect Company and employee property by deterring incidents of vandalism and theft;
- To manage inventory;
- To comply with the requirements or directives of Transport Canada and other regulatory bodies; and
- For other purposes permitted under the Privacy Legislation.

Video surveillance is not intended to and will not be used to continuously monitor employee productivity, performance or work habits. However, in appropriate cases and where permitted by the Privacy Legislation, information collected through video surveillance may be used to investigate incidents of employee misconduct, including any contraventions of Company rules and policies, which may lead to disciplinary action up to and including termination of employment.

Information relevant to such incidents listed above may be disclosed, where permitted or required under the Privacy Legislation, to persons authorized to collect such information under the Privacy Legislation, including but not limited to law enforcement officials. Video surveillance footage may be used or disclosed as permitted or required by the Privacy Legislation.

If the Company seeks to collect, use or disclose an employee's personal information for purposes other than what is specified in this Policy, affected employees will be asked for their consent before doing so, unless such collection, use or disclosure without consent is permitted or required under the Privacy Legislation.

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### 4. ACCESS

Live video feeds, speeding alerts and recorded data are accessible only to a limited number of authorized site security and senior management for the purposes set out in this Policy, as well as to IT technicians solely for repair, replacement and maintenance purposes.

Individuals wishing to access footage in which their image or activities have been captured should direct their access request to the Company's Privacy Officer. Access will be granted in accordance with the processes set out in the Privacy Legislation.

### 5. UNAUTHORIZED DISCLOSURE OR ACCESS

The Company views any breach of the confidentiality of the personal information collected by video surveillance as a serious matter. In the event of an unauthorized disclosure or access of the images or videos collected by the surveillance system, the process succeeding such unauthorized disclosure or access will include the following steps:

- a. The Company will contain the breach as soon as possible and stop the unauthorized activities;
- b. The Company will designate an appropriate individual to lead an initial investigation into the unauthorized activities;
- c. The Company will notify individuals of any breach of security safeguards involving their personal information under the Company's control if it is necessary to do so to avoid or mitigate harm to the individuals or to comply with Privacy Legislation; and
- d. The Company will keep a record of any breach of security safeguards involving personal information under its control.

All individuals working for or with the Company who may come into contact with the personal information of employees are expected to maintain the security and confidentiality of the personal information that they access or acquire in the course of their employment or contractual responsibilities, including by limiting access to that information on a need-to-know basis. The Company investigates non-compliance with this Policy and with the Privacy Legislation where the

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Company has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed. Employees who fail to properly maintain the safety and security of personal information may be subject to discipline up to and including termination of their employment.

### 6. SECURITY, RETENTION, STORAGE AND DISPOSAL

All records (videotapes, still photographs, digital data, etc.) produced by video surveillance will be kept securely at all times. Hard drives and any physical records are kept in a locked premises and digital records are encrypted and password protected. The Company endeavours to ensure that personal information is protected against loss or theft as well as unauthorized access, disclosure, copying, use or modification.

Surveillance data is retained for a maximum of 60 days at premises where video surveillance equipment is owned and operated by the Company, at which point it is permanently and safely erased from the hard drive or recorded over unless the data is accessed and saved for one of the purposes identified in this Policy and in accordance with the Privacy Legislation.

### QUESTIONS

Questions, concerns or complaints about this Policy or the use of video surveillance can be directed to the Privacy Officer at [privacyofficer@westeve.com](mailto:privacyofficer@westeve.com)

Version Number	Date	Originator	Details of Change
1.0	November 16, 2021	Western Stevedoring	Created
This policy is to be reviewed at a minimum of every 3 years.			