

Privacy Policy

Western Stevedoring and its subsidiary companies (*Western Stevedoring*) are committed to protecting the privacy rights of individuals whose personal information is under its control. This Policy sets out the Western Stevedoring procedures and guiding principles in its collection, use and disclosure of personal information required in maintaining the employment relationship with you and in the course of its business.

Accountability

Western Stevedoring is responsible for the personal information under its control. Western Stevedoring has a designated Privacy Officer, Jeanette O'Brien, Director, Human Resources, Administration & Community Relations, who is accountable for its compliance with this Policy and, as applicable, the federal *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c. 5 ("*PIPEDA*") and the provincial *Personal Information Protection Act*, S.B.C. 2003, c. 63 ("*PIPA*").

Identifying Purposes

Western Stevedoring collects personal information about its employees in the normal course of operations.

Personal information as defined under section 2(1) of *PIPEDA* and section 1 of *PIPA* is information about an identifiable individual. It includes information such as an employee's SIN, date of birth, telephone number and address, performance information and employee number.

Consent

Western Stevedoring will not collect, use or disclose your personal information without your knowledge and consent, except as permitted under *PIPEDA*, *PIPA*, or as required by law. At the time of or prior to collecting personal information, Western Stevedoring will inform you of the reason(s) for collecting such information, what it will be used for, and to whom it will be disclosed.

You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. Western Stevedoring will inform you of the implications of withdrawal of consent.

Limiting Collection

Western Stevedoring will limit the collection of personal information to what is necessary for the specified purpose, and information will only be collected by fair and lawful means.

Limiting Use, Disclosure, and Retention

Unless you consent, or unless permitted or required by law to do otherwise, the use and disclosure of your personal information will be limited to the purpose for which the personal information was collected.

If Western Stevedoring engages third parties that involve the use of personal information, Western will take steps to ensure that said third parties understand and follow *PIPEDA*, *PIPA*, and this Policy.

Personal information will be retained for only as long as necessary to fulfill the purpose(s) for which the personal information was collected, or for a duration reasonably required for operational, administrative, regulatory or statutory purposes. Personal information that is governed by *PIPA* and that is used to make a decision that directly affects an employee will be retained for at least one year.

Accuracy

Western Stevedoring will endeavor to keep personal information as accurate, complete, and up to date as is necessary for the purposes for which it is to be used. Employees should inform their Manager or Human Resources of any updates to their personal information as soon as possible.

Safeguards

Western Stevedoring will put in place appropriate security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. These security safeguards will vary depending on the sensitivity of the information as well as the format in which the information is held and will include locked filing cabinets and restricted access to offices, access on a “need-to-know” basis and the use of passwords and encryption as appropriate. At branch office locations, this information is stored in locked desks or filing cabinets of the Business Unit Manager.

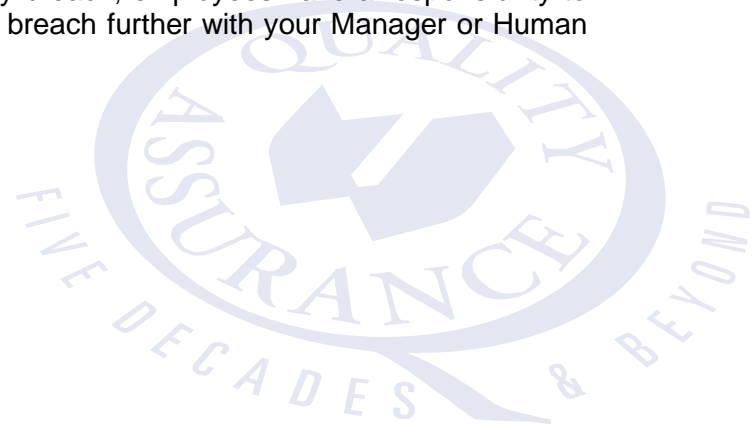
Western Stevedoring will take care to prevent unauthorized parties from gaining access to personal information during the long-term storage or destruction of information. Currently, in preparation for disposal, confidential information is housed in locked bins located in a secure area of the head office administrative building in North Vancouver, BC. In addition, for long-term storage requirements, confidential information is stored in sealed boxes in secured storage rooms on the terminal facility. These records are destroyed in accordance with federal and provincial statutes affecting various classifications of records. Western Stevedoring contracts with a third party, bonded contractor in the destruction of confidential information. The contractor retrieves the documents from the locked bins or, in an annual exercise, from the storage rooms and destroys these documents on-site in an appropriately equipped mobile unit.

Branch offices possess shredders in order to ensure the complete destruction of personal information which exists in low volumes at those locations.

Employees Responsibility

Employees also have the responsibility to maintain the confidentiality of personal information. Employees must never access, obtain or disclose to anyone within or outside of Western Stevedoring another individual’s personal information unless authorized by management.

If employees learn of a suspected or actual privacy breach, employees have a responsibility to notify and discuss the suspected or actual privacy breach further with your Manager or Human Resources.



Openness

Western Stevedoring's policies and practices relating to the management of personal information are available by:

- accessing the Policies and Procedures folder located on the Western Stevedoring intranet (SharePoint);
- contacting your Manager;
- emailing info@westeve.com; or
- contacting Human Resources at hr@westeve.com

Any complaints or inquiries may be forwarded to Jeanette O'Brien at jobrien@westeve.com, 604-904-2805, Western Stevedoring, 15 Mountain Highway, North Vancouver, BC V7J 2J9.

Individual access

Upon written request, employees can access personal information about themselves, including how their personal information has been used and disclosed. This right to access personal information is subject to certain legal restrictions and Western Stevedoring will take reasonable steps to verify the individual's identity and right to access the requested information.

Employees may challenge the accuracy and completeness of the personal information and, if required, have it amended as appropriate. A record will be made of any such challenges, whether successful or not.

Challenging Compliance

Western Stevedoring will investigate and respond to any complaints or inquiries relating to its compliance with *PIPEDA*, *PIPA*, or this Policy. Complaints or inquiries should be forwarded to our Privacy Officer. The Privacy Officer will endeavour to investigate and respond to any complaints or inquiries within 30 days.

If you are not satisfied with the Privacy Officer's response to your complaint, you may file a complaint with the federal Privacy Commissioner if *PIPEDA* is applicable (<https://www.priv.gc.ca/en/report-a-concern/file-a-formal-privacy-complaint/>) or the provincial Privacy Commissioner if *PIPA* is applicable (<https://www.oipc.bc.ca/for-the-public/how-do-i-make-a-complaint/>).



Signed: September 1, 2020

Version Number	Date	Originator	Details of Change
1.0	Sept 1, 2020	WSGC	Created