



EMPLOYEE PRIVACY POLICY

PURPOSE

To establish procedures and guidelines implementing Province of Alberta requirements for privacy in the workplace and to ensure that employee's personal information is secured, collected, used, disclosed and retained only as may be reasonable and in accordance with the applicable law.

This policy has been developed in order to balance the need to utilise personal information about our employees with your right to privacy with respect to your personal information. This policy is intended to be consistent with the obligations and rights provided for under the Alberta *Personal Information Protection Act* ("the Act"), as amended from time to time.

DEFINITIONS

For the purposes of this policy:

"Employee" includes all TERRA employees whose employment relationships are commenced, managed or terminated in the Province of Alberta, and includes not only those employed by TERRA, but also all those who perform services for TERRA, including temporary employees, consultants, apprentices, volunteers, participants, or students, under contract or as an agent.

"Personal Information" means information about an identifiable individual.

"Personal Employee Information" is a category of Personal Information under the Act, which is reasonably required by TERRA to be collected, used or disclosed solely to establish, manage or end an employment or volunteer work relationship. Personal Employee Information may include, for example, name, home address, home telephone number, ID numbers, educational qualifications, social insurance number and employment history. Of course, not all Personal Information that happens to be about Employees is "Personal Employee Information", as this does not include Personal Information that is not related to an Employee's employment relationship.

"TERRA" means TERRA Energy Corp. TERRA may also be referred to as "we" or "us".

COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

We are entitled to and will collect, use and disclose Personal Employee Information without your consent if it is reasonable to do so and if the information consists only of information that is related to your employment or volunteer working relationship, and as long as notice of such collection, use and disclosure is given. We may, when necessary collect Personal Employee Information from sources other than you.

In addition, from time to time, we may collect information that does not fall in the definition of “Personal Employee Information”. An example of this might be information about your family for purposes of planning a staff and family function. We will always be reasonable in our collection of such Personal Information, and will rely on your deemed consent if it is reasonable to so. You are deemed to have consented to the collection, use or disclosure of Personal Information if you voluntarily give the Personal Information for a particular purpose, and it is reasonable that a person would voluntarily provide that information.

Our General Notice regarding Personal Employee Information that we may collect, use and disclose, and other specific notices as required from time to time, are available from the Privacy Officer, Bud K. Love.

We may collect, use and disclose additional Personal Information without your consent in circumstances where permitted or required by law. These circumstances include (but are not limited to) circumstances where collection, use or disclosure is:

- clearly in the interests of the individual and consent cannot be obtained in a timely way or the individual would not reasonably be expected to withhold consent;
- pursuant to a statute or regulation of Alberta or Canada that authorizes or requires the collection;
- from a public body and that public body is authorized or required by an enactment of Alberta or Canada to disclose the information to the organization;
- of information that is publicly available;
- necessary to determine the individual’s suitability to receive an honour, award or similar benefit;
- reasonable for the purposes of an investigation or a legal proceeding.

In other circumstances and where required to do so by the Act, we will obtain your consent for the intended collection, use or disclosure of Personal Information.

When we collect, use or disclose Employee Personal Information, we will make reasonable efforts to ensure that all information is accurate and complete. In addition, only our employees who have a reasonable requirement to access your Personal Information will be given access to it. This includes limited access those employees whose job functions involve the hiring of Employees, the evaluation of their performance

and the fulfillment of administrative, supervisory, or management purposes related to the establishment, management or ending of TERRA employment relationships.

We keep Personal Employee Information only for as long as is reasonably necessary. In most cases this means that we will keep your Personal Employee Information for no longer than seven years, as this is the period reasonably required for Canadian tax reporting purposes. In certain exceptional circumstances we may decide to keep your Personal Employee Information for a longer period of time, if such a retention period seems reasonably necessary. We will, however, destroy your information when the appropriate retention period has expired.

SECURITY OF PERSONAL INFORMATION

We recognize our obligations to safeguard the Personal Information we hold about our employees. We have therefore made reasonable arrangements to secure against the unauthorized access, collection, use, disclosure, copying, modification and disposal of Personal Employee Information. These arrangements include:

- limiting the access to and uses of information to TERRA employees that reasonably require such information;
- requiring the use of physical and electronic access codes and passwords;
- informing all employees about the importance of privacy.

REQUESTS FOR ACCESS TO PERSONAL INFORMATION

Employees may submit access requests for:

- any or all of their Personal Information under our custody or control;
- information about how their Personal Information under our control has been and is being used by us;
- the names of the individuals and organizations to which their Personal Information under our control is being or has been disclosed.

Access requests must be written and must provide sufficient detail to enable us, with reasonable effort, to identify the information in respect of which the request is made. In this regard, we have Personal Information Access Request Forms available on available from the Privacy Officer, Bud K. Love.

An employee's ability to access his or her Personal Information is not absolute. We must not disclose Personal Information if:

- the disclosure could reasonably be expected to threaten the safety or physical or mental health of another;

- the disclosure would reveal Personal Information about another individual;
- the disclosure would reveal the identity of an individual who has in confidence provided Personal Information about another individual and the individual providing the opinion does not consent to disclosure of his or her identity.

We are not required to disclose Personal Information in certain circumstances such as the following:

- the Personal Information is protected by any legal privilege.
- the disclosure of the Personal Information would reveal confidential information that, is of a commercial nature and it is not unreasonable to withhold that information.
- the Personal Information was collected for an investigation or legal proceeding;
- the Personal Information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which the mediator or arbitrator was appointed to act:
 - (i) under an agreement,
 - (ii) under an enactment, or
 - (iii) by a court.

We will review our obligations upon receipt of an access request, and will respond as required by the Act and in accordance with the rights and obligations in the Act. In particular, in the event one of the above circumstances arises to restrict disclosure, and in accordance with the Act, we may sever the information we are not permitted or not required to disclose, and may provide access to the remaining information. We will also make a reasonable effort to assist applicants and to respond as accurately and completely as reasonably possible.

REQUESTS FOR CORRECTION OF PERSONAL INFORMATION

Employees may submit written requests to us to correct errors or omissions in their Personal Information that is in our custody or control. Upon receipt of such a request, we will:

- correct the Personal Information and, if reasonable to do so, send correction notifications to any other organizations to whom we disclosed the incorrect information; or
- decide not to correct the Personal Information, but annotate the Personal Information that a correction was requested but not made.

In this regard, we have Personal Information Correction Request Forms available from the Privacy Officer, Bud K. Love.

CONTACTING OR COMMUNICATING WITH US

Our Privacy Officer is Bud K. Love. If you have any questions concerning the handling of your Personal Information, or if you wish to request access to, or correction of, your Personal Information under our care and control, please set out the reasons for your concern in writing and forward to:

Bud K. Love, Privacy Officer
Terra Energy Corp.
970, 333 Seventh Avenue SW
Calgary, AB T2P 2Z1

If, after our Privacy Officer has received your concern you remain dissatisfied, you then have the right to contact the Office of the Information and Privacy Commissioner by mail, e-mail or telephone, at:

E-mail: generalinfo@oipc.ab.ca

Telephone: (403) 297-2728

Mail: Office of the Information and Privacy Commissioner
Suite 500, 640 - 5th Avenue SW
Calgary, AB
T2P 3G4

Please note that it is not possible to access the Calgary office of the Office of the Privacy Commissioner without an appointment.

CHANGES TO THIS POLICY

We reserve the right to change this policy from time to time as industry practice, the law, and our procedures in this area may change from time to time. Any changes will be disseminated to you via email.