

# PRIVACY POLICY



## I. PURPOSE OF THE POLICY

Pembina is committed to maintaining the accuracy, confidentiality and security of Personal Information in accordance with applicable privacy laws. This Policy sets out the manner in which Pembina collects, uses, discloses, protects and otherwise manages Personal Information.

## II. SCOPE AND APPLICATION

This Policy applies to the privacy practices at Pembina with respect to: (i) Business Contacts; and (ii) Personnel.

### Definitions

In this Policy:

**"Business Contact"** means customers, suppliers, contractors, consultants, landowners and other stakeholders in emergency planning zones, other individuals that are in the vicinity of, or may be directly and adversely affected by Pembina's developments, investors and other groups and individuals with whom Pembina engages with in the course of its business;

**"Corporation"** means Pembina Pipeline Corporation;

**"Pembina"** means collectively, the Corporation and its subsidiaries;

**"Personal Information"** means information about an identifiable individual, but does not include information that is publicly available, such as information in an online directory, or business contact information (information that would appear on a business card) when used for business-related purposes;

**"Personnel"** means Pembina's current, prospective and former directors, officers, employees, contractors, consultants and volunteers;

**"Policy"** means this Privacy Policy; and

**"User"** means Business Contacts and Personnel that visit Pembina's website and have cookies placed on their computer hard drives.

### **III. PRINCIPLES**

#### **A. Collection of Business Contact Personal Information**

Pembina collects Personal Information, as applicable, relating to Business Contacts, which may include but is not limited to:

- home and emergency contact information;
- credit card and banking information;
- criminal, credit and other background check information;
- driving records;
- social insurance numbers;
- survey responses;
- site access and fitness for work information;
- information relating to title, land ownership, taxation, dower rights, vehicle information and road use/access;
- residential and tenancy information, alternate contacts and current location information;
- employment information and location;
- health information relating to special needs;
- licensing and permit application information (e.g., emergency response plan information);
- information relating to participation in regulatory and governmental processes;
- investor information (e.g., number of shares and other information collected in relation to the purchase of shares); and
- information required by law enforcement, regulatory and governmental bodies, or provided to Pembina in the course of legal or regulatory proceedings.

#### **B. Use and Disclosure of Business Contact Personal Information**

In relation to Business Contacts, Pembina collects, uses and discloses Personal Information necessary to its operations and business relationships, including but not limited to information needed:

- to establish and maintain director and investor relationships;

- to establish and maintain commercial relationships;
- to develop, enhance, market, promote or provide products and services;
- to manage and develop Pembina's business operations;
- to comply with and enforce its policies and procedures;
- for security, criminal, credit or fraud prevention purposes;
- to administer Pembina's webpage;
- to establish and maintain ongoing stakeholder and landowner databases and information;
- in relation to business transactions;
- in the context of an emergency;
- for other purposes identified in privacy consent forms or statements; and
- to meet legal and regulatory requirements.

In some cases, Pembina may require Business Contacts to demonstrate individual consent obtained for the collection, use and disclosure of Personal Information provided to Pembina.

Pembina collects, uses and discloses Personal Information only for the purposes for which the information was collected, except as authorized by law. Pembina will, if required, notify or obtain consent for use and disclosure of Personal Information which falls outside the purposes for which the information was originally collected. Personnel are prohibited from maintaining or utilizing Business Contact Personal Information in any manner upon the termination of their employment with Pembina.

Pembina will not trade, rent or sell Personal Information without consent.

### **C. Website**

Some pages on Pembina's website use a technology called "cookies". Cookies are capable of storing data to help enhance a User's visit to Pembina's website.

Such technology allows Pembina to:

- enhance the functionality of Pembina's website (e.g., User identification and password prompts);
- provide targeted content to Users;
- obtain statistical analysis of website traffic (e.g., what pages are most popular);
- administer Pembina's website and servers;

- allow for auditing of Pembina's services by third parties; and
- enhance User experience on Pembina's website and improve Pembina's services.

Pembina uses third party vendors and advertisers that may also place cookies on a User's browser to tailor advertising directly to a User. Such third-party service providers are required to maintain privacy protections that are equivalent or substantially similar to those outlined in this Policy.

For more information regarding Pembina's use of cookies or the use of third-party service providers and their technologies as it relates to a User's Personal Information, please contact Pembina's Privacy Officer.

#### **D. Collection of Personnel's Personal Information**

Pembina collects Personal Information relating to Personnel, which may include but is not limited to:

- date of birth and home contact information;
- emergency contact information;
- citizenship and work permit status;
- marital and family status;
- professional affiliations, status and membership information;
- job application and background check information (e.g., resumes, references and academic, criminal, credit and work history);
- driving records;
- social insurance numbers;
- benefits and pension enrollment and maintenance information, including spouse and dependent names and birthdates;
- medical information relating to fitness for work and accommodation needs;
- results of alcohol and drug testing;
- tax, banking and payroll information;
- performance appraisals;
- information collected through Pembina's security and workplace monitoring systems; and
- information collected through Pembina-owned equipment (such as laptops, telephones and personal digital assistants) and information technology systems.

## E. Use and Disclosure of Personnel's Personal Information

In relation to Personnel, Pembina collects, uses and discloses Personal Information necessary to its operations and business relationships, including but not limited to information needed:

- to evaluate and select prospective Personnel;
- to establish the employment relationship, including the verification of references, work history and qualifications;
- to determine suitability and eligibility for advancement, transfer or promotion;
- to maintain and manage the employment relationship, including:
  - the assessment of performance, qualifications and fitness for duty;
  - the provision of training;
  - compliance with and enforcement of Pembina's policies and procedures;
  - to determine and meet accommodation needs;
  - for immigration purposes; and
  - to provide insurance and indemnity;
- to maintain the security of and appropriate use of Pembina worksites, property and information technology systems;
- to terminate the employment relationship and manage the post-employment relationship;
- to carry out workplace investigations;
- to compile workplace directories;
- for use in making travel arrangements;
- to plan social activities and events;
- to setup and administer payroll, benefits, and pension and compensation plans;
- to process work related claims (e.g., workers' compensation and disability claims);
- in relation to business transactions;
- in the event of an emergency; and
- to meet legal and regulatory requirements.

## IV. TRANSFER OF PERSONAL INFORMATION

Pembina discloses a limited amount of Personal Information to certain third-party service providers located within Canada and in other countries throughout the world for the purposes described above. Pembina requires that such service providers maintain privacy protections that are equivalent or substantially similar to those outlined in this Policy.

The Corporation and its subsidiaries also routinely transfer Personal Information among and between themselves for the purposes described above.

Please note that, while Personal Information is located outside Canada, it is subject to the legal requirements of the jurisdiction in which it is located, including lawful requirements to disclose Personal Information to government authorities in those countries.

## V. PROTECTION OF PERSONAL INFORMATION

Pembina protects Personal Information in a manner appropriate for the sensitivity of the information and makes reasonable efforts to prevent loss, misuse, disclosure, copying, modification, disposal or destruction of Personal Information or any unauthorized access to Personal Information. Pembina retains Personal Information only as long as reasonably necessary for the purposes described above. When destruction is appropriate, Pembina employs appropriate measures to destroy Personal Information, including shredding paper records and permanently deleting electronic records.

## VI. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

Individuals may access their own Personal Information in Pembina's custody or control, except in specific circumstances as determined by Pembina. For example, privacy law prohibits access to information that may contain Personal Information about another individual and allows for the withholding of confidential business information. If refusing a request in whole or in part, Pembina will provide the reasons for the refusal. In some cases where exceptions to access apply, Pembina may withhold that information and provide the remainder of the record.

Individuals may also request a correction of their own Personal Information in Pembina's custody or control.

Requests for access or correction should be made in writing to Pembina's Privacy Officer. Sufficient information must be provided in the access or correction request to allow Pembina to identify the information or correction the individual is seeking.

Pembina will endeavour to respond to an individual's request for access or correction within 45 days of receiving the written request (unless a shorter time period is mandated by applicable law) and will indicate whether the individual is entitled to access or correct the information. If access or correction is refused, Pembina will provide reasons for the refusal, the name of the person who can answer questions about the request and advise of the right to have the decision reviewed by the applicable Privacy Commissioner.

## VII. COMPLIANCE

Personnel must comply with this Policy at all times. Any breaches of this Policy may result in disciplinary action up to and including termination of employment for cause or termination of engagement, as well as potential civil and criminal sanctions.

Violations of this Policy should be reported in accordance with Pembina's Whistleblower Policy.

Any questions about this Policy or about Pembina's collection, use, disclosure, transfer and access of Personal Information should be directed to Pembina's Privacy Officer:

**Email:** [privacy@pembina.com](mailto:privacy@pembina.com)

**Phone:** (403) 231-7500

## VIII. REVIEWED AND APPROVED

The Senior Vice President, External Affairs & Chief Legal & Sustainability Officer and the Senior Vice President & Corporate Services Officer are the executives responsible for this Policy. This Policy will be reviewed annually by the Senior Vice President, External Affairs & Chief Legal & Sustainability Officer and the Senior Vice President & Corporate Services Officer. Any material change to this Policy must be submitted to the Governance, Nominating and Corporate Social Responsibility Committee for approval.

This Policy was last approved by the Governance, Nominating and Corporate Social Responsibility Committee in August 2022.

## IX. RELATED POLICIES

The following policies relate to the subject matter of this Policy:

- [Code of Ethics Policy](#)
- [Disclosure Policy](#)
- [Alcohol & Drug Policy](#)
- [Respectful Workplace Policy](#)
- [Security Management Policy](#)
- [Acceptable Use of Information Assets Policy](#)
- [Whistleblower Policy](#)

## X. SUPPORTING DOCUMENTS

Rules and Conventions in support of this Policy may be created and approved by the Senior Vice President, External Affairs & Chief Legal & Sustainability Officer and the Senior Vice President & Corporate Services Officer and the Officer Committee.