

Workplace Privacy and Confidentiality Policy

Shakti by TELUS, in compliance with the Personal Information Protection Act (PIPA), is committed to maintaining the privacy and confidentiality of personal information, especially pertaining to employees. This policy outlines the guidelines and procedures to ensure the responsible collection, use, and disclosure of personal employee information.

Scope: This policy applies to all employees, including potential, current, and former employees, and governs the handling of personal employee information in accordance with PIPA.

1. Collection of Personal Employee Information

Collection with Consent: Shakti by TELUS will seek the consent of individuals before collecting their personal employee information for reasonable purposes.

- Notice will be provided before or during the collection process, outlining the purposes and the individual's right to decline consent.
- Collection without Consent: Personal employee information may be collected without consent in specific circumstances outlined by PIPA, including when it is in the person's interests, consent cannot be obtained in a timely manner, or there is legal authority for the use.
- Notification for Current Employees: Before collecting personal employee information from current employees, the organization will provide reasonable notice, explaining the collection purposes.

2. Use of Personal Employee Information:

- Use with Consent: Shakti by TELUS will use personal employee information only with the individual's consent, except in cases allowed without consent by PIPA.
- Use without Consent: Personal employee information may be used without consent for reasonable purposes related to establishing, managing, or terminating an employment relationship, or for managing a post-employment relationship.
- Notification for Current Employees: Before using personal employee information, the organization will give current employees reasonable notice, specifying the purposes of use.

3. Disclosure of Personal Employee Information:

- Disclosure with Consent: Shakti by TELUS will disclose personal employee information with the individual's consent or as permitted by PIPA.
- Disclosure without Consent: Personal employee information may be disclosed without consent for reasonable purposes related to employment relationships, as outlined by PIPA.

- **Notification for Current Employees:** Before disclosing personal employee information, the organization will provide current employees with reasonable notice, detailing the purposes of disclosure.

4. Keeping Employee Information Safe

Shakti by TELUS acknowledges its responsibility for keeping personal information safe. Specific requirements, including security measures, accountability, and providing individuals access to their personal information upon request, will be implemented to safeguard personal employee information.

Inquiries: For any questions or concerns regarding the privacy and confidentiality of personal information, employees are encouraged to contact Irene Korinetz.

Review: Shakti by TELUS will regularly review and update this policy to ensure ongoing compliance with PIPA and any relevant privacy laws. Employees are expected to familiarize themselves with this policy and adhere to its principles.

As part of our commitment to ongoing safety improvements this policy and procedure will be reviewed once every three years and or in the event of a safety incident.

Reviewed 3/14/2024

Reviewed 12/5/2024