

PRIVACY POLICY

Our Commitment

This Privacy Policy is based on the federal Personal Information Protection and Electronic Documents Act ("PIPEDA") and Alberta's Personal Information Protection Act (PIPA). It governs the relationship between Grant Production Testing Services Ltd., and individuals with whom we interact, such as our customers or potential customers, employees and contractors ("you").

At Grant PTS we are committed to providing excellent service and to ensuring that our relationship with you and our customers is conducted with integrity and in a responsible, fair, honest and ethical manner. Consistent with these objectives we maintain high standards of confidentiality with respect to the personal information in our possession.

If you have any questions about this Privacy Policy or wish to access the personal information in our possession about you, please contact our Privacy Officer noted on page 3.

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1.0 Collection, Use and Disclosure of Personal Information

1.1 What is personal information?

Personal information is information that may be used to identify a specific individual. Examples of personal information include your name, address, age, social insurance number and other personal identification numbers.

1.2 What personal information does Grant PTS collect and use?

In the course of carrying on our business, it is necessary for Grant PTS to collect and use information about a variety of individuals. The way this information is used is dependent upon the nature and sensitivity of the particular information. Grant limits its collection, use and disclosure of your personal information to the purposes that we have identified to you. For example, Grant may collect personal information such as name, address and contact information in order to provide you with important information about company safety and to respond to your questions or concerns.

1.3 Purposes: Why do we collect personal information?

Grant collects and uses personal information for the purposes reasonably required to carry on our business, including the following:

- a. To establish and maintain a responsible relationship with you Grant collects basic information from its employees and contractors to confirm identity and related contact information. This information is used to maintain an effective relationship with you.
- b. To meet legal and regulatory requirements Grant collects and uses personal information in order to meet our contractual obligations to you, and our legal and regulatory obligations to others.
- c. To manage, develop and improve our operations Grant collects and uses personal information to ensure the safe and efficient operation of our testing business.

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If we identify a new purpose for the personal information that we have collected from you, we will obtain your consent before using your personal information for the new purpose.

1.4 What personal information does Grant disclose?

Grant PTS may be required to disclose personal information about individuals in certain situations, including the following:

- a. To a customer or a third party service provider where the customer or third party service has agreed to handle the information in accordance with our policies and the applicable legislation.
- b. To a person whom Grant PTS reasonably believes to be acting as the individual's agent.
- c. To a public authority, or its agent, to the extent required to comply with legal or regulatory requirements.
- d. To enroll employees in our benefits program, Grant PTS uses personal information such as your date of birth and spouse's date of birth (if applicable).

1.5 Consent

Except in limited circumstances, Grant will only collect, use or disclose your personal information with your consent. By your receipt of this Privacy Policy, Grant will assume, unless we hear from you otherwise, that you consent to the collection, use and disclosure of your personal information by Grant in accordance with this Policy.

You may withdraw or limit your consent to our collection, use or disclosure of your personal information at any time, subject to any legal or contractual restriction and reasonable notice. Please note that the withdrawal of your consent may change the way in which Grant is able to interact with you.

We will not use or disclose your personal information without your consent except in the following circumstances:

- a. When required by law or for law enforcement or investigatory purposes.
- b. For an emergency that threatens life, health or security.
- c. If the information is publicly available and specified in the applicable regulations.

2.0 Protecting Your Personal Information

Keeping your personal information confidential and secure is a priority for us. In order to ensure protection of your personal information, we have developed security procedures to safeguard and protect your personal information against loss, theft, unauthorized disclosure, copying, and unauthorized use or modification, including:

- a. Limiting the collection, use and disclosure of personal information to that reasonably required to carry on our business.
- b. Ensuring that areas and documents are only accessible by authorized personnel on a need-to-know basis.
- c. Protecting the confidential nature of personal information when dealing with other organizations and requiring them to meet the same standard as we do in handling personal information.

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3.0 Your Rights

3.1 Accessing your personal information

We will honor any reasonable requests you make to review, update or correct any of your personal information that is held by Grant Production Testing Services Ltd. We will respond to your request for access within 5 business days of the request being made.

You could refuse to allow us to obtain, use or share your personal information or you could also withdraw a previously given consent at any time. However, by doing so, depending on the situation, you may be limiting or even preventing our ability to provide you with the services we provide.

3.2 Requesting an update or correction

If you believe that any of your personal information is inaccurate, you may ask us to correct it. We will respond to your request to update or correct your personal information immediately.

3.3 Registering complaints

In the event of any conflict or other concern regarding access to, or the accuracy or our use of, your personal information, you may register a question or complaint with our Privacy Officer.

4.0 Contact Information and Resources

If you wish to access your personal information, change your consent to the ways in which we may use your personal information, have a complaint about our Privacy Policy or the manner in which we may have handled your personal information, or if you have any questions about our Privacy Policy, please contact the appropriate Privacy Officer as follows:

Cathy Mason

Head Office

1850, 540 – 5th Avenue SW Calgary, AB T2P 0M2

Telephone: 403.663.0050

Fax: 403.663.0051

cmason@grantpts.com

To find out more about federal privacy laws, contact the Office of the Privacy Commissioner at 1-800-282-1376 or visit its website at www.privcom.gc.ca.

For more information on privacy laws in Alberta, you may contact the Office of the Information and Privacy Commissioner of Alberta toll free at 1-888-878-4044 or email generalinfo@oipc.ab.ca or visit its website at www.oipc.ab.ca.

5.0 Changes to this Privacy Policy

In order to ensure that our Privacy Policy is kept up to date, we reserve the right to change it from time to time. Notice of changes to the Privacy Policy will be given to each employee and contractor directly.

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6.0 Grant's Commitment to the Ten Privacy Principles

- Principle #1:** Accountability – Grant PTS is responsible for personal information under its control and has designated Privacy Officer who is accountable for Grant PTS's compliance with the ten privacy principles.
- Principle #2:** Identifying Purposes - Grant PTS shall identify the purposes for which personal information is collected at or before the time of collection.
- Principle #3:** Obtaining Consent - The knowledge and consent of an individual are required for the collection, use, or disclosure of personal information, except where inappropriate.
- Principle #4:** Limiting Collection - The collection of personal information shall be limited to that which is necessary for the purposes identified by Grant PTS. Personal information shall be collected by fair and lawful means.
- Principle #5:** Limiting Use, Disclosure and Retention - Grant PTS shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Grant PTS shall retain personal information for a maximum of 5 years as required by law.
- Principle #6:** Keeping Personal Information Accurate - Grant PTS shall keep personal information as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
- Principle #7:** Safeguarding Personal Information - Grant PTS shall protect personal information by security safeguards appropriate to the sensitivity of the information.
- Principle #8:** Openness Concerning our Privacy Practices - Grant PTS shall ensure that specific information about its policies and practices relating to the management of personal information is made readily available to individuals with whom it interacts.
- Principle #9:** Access to Information – Grant PTS shall, upon request, inform an individual of the existence, use, and disclosure of his or her personal information and shall give such individual access to that information.
- Principle #10:** Challenging Compliance - An individual shall be able to address a challenge concerning Grant PTS's compliance with Alberta's PIPA to the appropriate Grant Privacy Officer.