

	Privacy Policy	
	Policy #: Privacy Policy	Created by: Human Resources
	Applicable to: All salaried and hourly personnel, direct service providers, contractors, and executive officers	Approved by: W. J. (Bill) Lingard
	Dated: February 27, 2006	Revised: October 26, 2009

1.0 Purpose

The privacy of FLINT's employees, customers and suppliers is important. FLINT is committed to protecting the privacy of these individuals and safeguarding their personal information. On January 1, 2004, the Alberta Personal Information Protection Act (PIPA), the Federal Personal Information Protection and Electronic Documents Act (PIPEDA), and other provincial privacy legislation came in to effect in Canada. As a result, FLINT enacted a Privacy Policy in compliance with the requirements of various privacy legislations and is committed to maintaining its Privacy Policy to a standard of meeting or exceeding the requirements of applicable privacy legislation.

FLINT's operations extend throughout Canada and the United States and the company is therefore required to comply with various regional and federal statutes governing the privacy of personal information. FLINT is committed to privacy and has developed a single Privacy Policy but recognizes that there may be slight variations in its application across the company as a result of the differences in statutes governing the privacy of personal information.

2.0 Policy

Personal Information is information about an identifiable individual, but does not include business contact information. FLINT is committed to maintaining the confidentiality, security and accuracy of personal information as required by privacy legislation. The following ten basic principles comprise FLINT's Privacy Policy:

2.1 Accountability

FLINT is responsible for maintaining and protecting the personal information under its control and shall designate one or more individuals to be accountable for FLINT's compliance with the principles of this Privacy Policy and the related governing legislation.

2.2 Identifying Purposes

The purposes for which personal information is collected will be identified at or before the time the information is collected unless privacy legislation permits otherwise.

2.3 Consent

Individual's consent will be obtained for the collection, use or disclosure of personal information, except where exemption is provided under the law. Certain privacy legislation differentiates between personal information related to the employment relationship and other personal information. The respective privacy legislation provides for personal employee information to be treated differently from other personal information in that it can be collected, used and disclosed in administering an employment relationship, or potential employment relationship, without the consent of the individual. FLINT will seek to obtain an individual's consent to use and disclose personal information at the time it is collected. We may seek an individual's express consent in

writing or by e-mail, or consent may be implied when an individual provides us with personal information.

On giving reasonable written notice to FLINT, an individual may withdraw consent to the collection, use or disclosure of their personal information at any time. FLINT's Privacy Officer will inform the individual of the likely consequences to the individual of withdrawing their consent.

2.4 Limiting Collection

The collection of personal information will be limited to that which is necessary for the purposes identified.

2.5 Limiting Use, Disclosure and Retention

Personal information will only be used or disclosed for the purposes for which it was collected, unless otherwise consented by the employee or when permitted or required by law. Personal information will be retained only as long as necessary to fulfill the purposes for which it was collected.

FLINT will maintain reasonable controls and practices to ensure that personal information is retained only as long as necessary and destroy the information once it is no longer relevant, required to be retained by law, or necessary for the purposes identified.

2.6 Accuracy

Personal information will be maintained as accurate, complete and up-to-date as necessary to fulfill the purposes for which it was collected. FLINT will not necessarily update personal information routinely, but rather will update it only when it is necessary to fulfill the purposes identified. It is the responsibility of the individual to make FLINT aware of any incorrect personal information or changes to it.

2.7 Safeguards

Security safeguards appropriate to the sensitivity level of the personal information shall be used to protect the information from loss, theft, and unauthorized access, use, disclosure or modification.

2.8. Openness

FLINT will provide information to individuals concerning its policies and procedures relating to the management of personal information under our control.

2.9 Individual's Access

Upon a written request addressed to FLINT's Privacy Officer, an individual will be informed of the existence, use and disclosure of their personal information and may be provided access to that information as required and permitted by law. Upon submitting a request for access to personal information, the individual will be required to provide proof of identification in order to permit FLINT to authorize access to the personal information.

FLINT may refuse to provide access to personal information if disclosure of the information would reveal confidential commercial information, the information could reveal personal information about another individual, the information could reasonably be expected to threaten the life or security of another individual, or where the information is protected by legal privilege.

2.10 Challenging Compliance

An individual may address inquiries or complaints concerning compliance to FLINT's Privacy Officer in writing. FLINT will investigate all complaints concerning compliance and its Privacy Policy and if necessary, will take appropriate measures to remedy the issue resulting in the complaint, including correcting information handling practices and policies where necessary. Complainants will be notified in writing of the outcome of an investigation clearly and promptly, informing them of any relevant steps taken.

Individuals are encouraged to first attempt to resolve a complaint following FLINT's complaint procedures. However, individuals have the right to submit a written complaint to the Information and Privacy Commissioner specific to their province or territory.

3.0 Privacy Officer Contact Information

The role of FLINT's Privacy Officer is to ensure compliance with privacy legislation, respond to requests for access and correction of personal information, and to work with the Information and Privacy Commissioner during the investigation of a privacy complaint against the organization.

FLINT's Privacy Officer is:

Vice President, Human Resources
FLINT Energy Services Ltd.
700, 300 – 5th Avenue SW
Calgary, AB
T2P 3C4
Telephone: (403) 218-7100
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