



**CHIEFTAIN
ENERGY**

PRIVACY POLICY

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Privacy Policy

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Approved by: Sean Kinmonth, Chief Operating Officer
Document Owner: Administration
Document Contact: Susan Tulloch

1.0 Documentation Notice

This document may be made available for public reference and use. Current versions of this approved document are maintained online and/or provided on request. Printed copies are uncontrolled.

1.1 Record of Version

Version Number	Version Date	Version Summary	Name/Signature
V000	10Jul20	Policy creation	Susan Tulloch
V001	21Aug20	Approval	Sean Kinmonth
R002			
R003			
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R006			
R007			
R008			
R009			
R010			

2.0 Purpose

Chieftain Energy LP (Chieftain Energy) is committed to keeping the personal information of its customers accurate, confidential, secure and private. This Privacy Policy has been designed to inform employees, customers, contractors and subcontractors of Chieftain Energy of this commitment, and in recognition of our obligation to meet the terms of applicable privacy regulations and practices under the Personal Information Protection and Electronic Documents Act (Canada) (PIPEDA).

3.0 Scope

Aspects of this Policy are incorporated into the terms and conditions for services provided by Chieftain Energy. This Policy describes the principles by which the company assures the privacy of personal information in its possession, addresses the reason why such information is collected, used, and disclosed, and outlines customers' rights with respect to this information. This Policy expands on the 10 privacy principles and the accepted framework specific to the protection of personal information as devised by the CSA Group.

In requesting services from Chieftain Energy and in providing Chieftain Energy with your personal information, through a phone contact, Website, credit application or otherwise, you are accepting the practices described in this Policy. The terms in this Policy may be updated from time to time and should be referred to periodically for changes.

For the purposes of this Policy, "personal information" means unique information about an identifiable individual, but does not include an individual's business contact or product information, or any other information that may be otherwise publicly available. Personal information does not include information that has been aggregated or de-identified, such that an individual's information cannot be recognized.

4.0 Privacy Principles and Framework

4.1 Accountability

Chieftain Energy is accountable for the protection of all personal information within its possession or control, including any personal information that is transferred to third parties for legal, regulatory, processing, storage, or other purposes. Chieftain Energy's employees are accountable for compliance with these privacy principles.

Chieftain Energy may engage third parties from time to time to perform services which involve access to personal information. Such third parties may be located outside of the company's operating jurisdiction, and in such instances, the information will be accessed according to the legislations in those jurisdictions. Chieftain Energy shall use contractual language or other means to provide a comparable level of protection of this information while the information is being processed by such third parties.

4.2 Identifying Purposes

Chieftain Energy may collect and use the following personal information from customers:

- Name, mailing and service addresses, and other contact information such as telephone numbers and email addresses;
- Banking or credit card information;

- Customer transactional information, such as account numbers, account balances and payment history;
- Identifying information, for example date of birth;
- Background financial information such as credit reports and credit reference information;
- Any other information which is received from a customer through correspondence or communications with Chieftain Energy.

Chieftain Energy will make an individual aware of the purposes for which the personal information is requested at or before the time the information is collected when you apply to receive services, for example, in a booking form, credit application, and/or by specific reference to this Policy.

Chieftain Energy collects, uses and discloses personal information as authorized or required by applicable legislation for purposes such as:

- To authenticate identity;
- To contact customers, respond to customer inquiries, service requests and/or issues, and to otherwise maintain business relations with customers;
- To manage operational requirements and to maintain the delivery of services;
- To establish credit worthiness, bill for services received, and/or to administer payments;
- To assist in the collection of accounts;
- For mandatory sector and industry tax, legal, and/or regulatory submissions and reporting;
- To assist with legal matters or proceedings, including preparation for same;
- To facilitate business transactions involving assets, such as a transfer, sale of financing assets (see further detail below under Limiting Use, Disclosure and Retention);
- To provide customers or third parties with information about services, pricing and consumption;
- To request customer or public participation in surveys, contests or other similar activities and initiatives;
- To notify customers or members of the public about sponsored events, causes or programs, and to keep track of participation levels and interest in such events;
- To provide individuals with information in the format they have requested; and
- To prepare financial reports and statements.

The above examples of collection, use and disclosure, which are not exhaustive, are a necessary part of a customer's business and service relationship with Chieftain Energy.

Chieftain Energy, at its discretion, may record all telephone conversations for the purposes of documenting transactions, and may monitor these conversations for quality assurance and training purposes. Customers will be advised if such recordings take place.

4.3 Consent

Chieftain Energy will obtain your consent before or when personal information is collected, used or disclosed, except where collection, use or disclosure is authorized or required by legislation. By requesting and accepting services from Chieftain Energy, it is implied the customer consents to the collection, use and disclosure of personal information for the purposes of providing such services. Consent may be provided orally, in writing, electronically, or implied (such as if a customer fails to notify Chieftain Energy that they do not consent to the collection, use, disclosure for certain purposes after they have received notice of those purposes, for example, through this Policy) or otherwise.

Consent may be obtained directly from a customer or from a third party that has obtained the customer's consent to disclose your personal information to Chieftain Energy, for example, an authorized representative, legal guardian, power of attorney or case worker. Subject to certain legal and contractual restrictions and reasonable notice, a customer can refuse or withdraw consent to the collection, use or disclosure of personal information at any time. However, refusal to provide such consent, or withdrawal of such consent, may prevent Chieftain Energy from providing the customer with certain products or services for which information is necessary.

In certain circumstances, Chieftain Energy may have a duty or right to collect, use or disclose your personal information to certain authorities without your knowledge or consent. If Chieftain Energy identifies other purposes for which the personal information may be collected, used or disclosed, Chieftain Energy will seek the individual's explicit consent in advance. Chieftain Energy will advise the individual of their right to refuse permission to use personal information for any new purposes.

4.4 Limiting Collection of Personal Information

Chieftain Energy will not collect personal information indiscriminately and will limit collection of personal information to that which is reasonable and necessary for the purposes outlined in this Policy or as otherwise consented to by the customer, and/or as authorized or required by applicable legislation.

4.5 Limiting Use, Disclosure and Retention

Chieftain Energy will use and disclose personal information as reasonable and necessary for the purposes outlined in this Policy, or as otherwise consented to by the customer, and/or as authorized or required by applicable legislation.

Chieftain Energy will not disclose personal information to any other party without written consent, except where such information is required to be disclosed, in order to:

- To comply with regulatory requirements;
- For billing and operational purposes; or
- For law enforcement purposes.

Due to the nature of the fuel distribution and trucking sectors, Chieftain Energy may be required to share information with government agencies and third parties as an outcome of delivering services. The operations of Chieftain Energy are governed by codes established by regulations and legislation. If personal information is shared with other parties, those parties are bound by appropriate agreements with Chieftain Energy to secure and protect the privacy of the customer's personal information. Under certain exceptional circumstances, Chieftain Energy may have a legal duty or right to disclose personal information without an individual's knowledge or consent.

Chieftain Energy will retain personal information only for so long as is necessary to fulfill the purpose for which it was collected, and to meet our legal, contractual or regulatory obligations. Chieftain Energy will not trade, rent or sell your personal information. However, in the course of a business transaction, such as a sale of a business or assets (or a part thereof), or a merger or amalgamation of Chieftain Energy with another company, we may disclose (with appropriate safeguards) personal information to third parties, including lawyers, accountants, financial advisors, agents and other representatives as necessary for the purposes of facilitating and completing such a transaction.

4.6 Accuracy

Chieftain Energy maintains procedures to ensure personal information collected, used and disclosed is kept as accurate, complete and up-to-date as necessary for the purpose for which it is to be used. However, we rely on the customer to provide all information material to providing services, and to inform Chieftain Energy of any errors or changes in such information. Individuals may challenge the accuracy and completeness of personal information related to them and have it amended as appropriate.

4.7 Safeguards

Chieftain Energy, in executing its responsibilities with respect to the confidentiality of personal information, will employ a number of safeguards appropriate to the sensitivity of the information and to the protection of such information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

These safeguards will include:

- Physical security measures, such as restricting access to facilities, locking filing cabinets, and maintaining “clean desk” protocol;
- Electronic security measures for computerized personal information such as masking, password protection, database encryption and personal identification numbers;
- Organizational measures such as limiting access to your personal information to a select group of employees, including the requirement to password protect their computers against unauthorized access; and
- Contractual obligations with third parties, who need access to your personal information.

4.8 Openness

Chieftain Energy will make its policies and practices relating to the protection of personal information available to its customers and employees. Chieftain Energy will keep all parties informed of this Policy and related practices via its Website. The information will be made available in a format that is accessible and easy to understand. Individuals who are unable to access this Policy electronically, may request a copy through the Privacy Officer.

4.9 Individual Access

Upon request and with satisfactory proof of a customer's identity, a customer of Chieftain Energy may obtain information regarding the type, use and disclosure, of his, or her, personal information that Chieftain Energy has in its custody or control. Any customer may request that his, or her, personal information be amended for purposes of accuracy and completeness. Where a disagreement regarding the accuracy of a customer's information cannot be resolved, Chieftain Energy will annotate the information to reflect the disagreement. Chieftain Energy may require a customer to provide access or correction requests in writing, and may charge a nominal fee for responding to such requests and advise a customer in advance of such costs. This right to access, however, is not absolute. For instance, Chieftain Energy may refuse to provide you with access to your personal information where such refusal is authorized or required by legislation or regulatory authorities.

Customers can make their requests for access by contacting the Privacy Officer. Response to a customer's request will be made within a reasonable time, provided the request is clear and concise, and the customer provides satisfactory proof of their identity.

4.10 Challenging Compliance

Chieftain Energy has procedures in place to receive, investigate and respond to complaints, and questions about this Policy. Parties may challenge Chieftain Energy's compliance with this Policy by contacting the Privacy Officer. If the customer is not satisfied with a response, they may contact:

Mail: Office of the Privacy Commissioner of Canada
30, Victoria Street
Gatineau, Quebec
K1A 1H3

Tel: 1-800-282-1376

5.0 Website

5.1 Using Chieftain Energy's Website

Chieftain Energy may collect personal information that users voluntarily provide when visiting the Websites. Personal information provided by users of Chieftain Energy's Website will be collected, used and disclosed in the same manner as information collected by other means, and in a manner consistent with this Policy. As this Policy may be amended from time to time, we recommend that users check the latest version of our Policy each time they visit the Website.

5.2 Automatic Data Collection

As is the case with Websites generally, when visitors access the Chieftain Energy Website, the site software automatically collects the internet protocol (IP) address of the computer through which the user is connected to the Internet. The Chieftain Energy Website also automatically collects information about the user's Internet browser software, operating system, the date and time of the user's visit, the URL of the last page visited by the user before entering the Website, and the pages accessed while on our site. This information is not used to gain personal information on individual users but is aggregated with that of other visitors to help us understand how the site is being used and how to make it better.

5.3 Cookies

Chieftain Energy may use cookies to provide certain features on its Website. Cookies form an essential part of the Internet and allows Websites to recognize a user's browser when the user returns to a previously visited Website. Chieftain Energy will not use cookies to retain personal information. Users are free to prevent the installation of cookies on their computer hard-drive, by simply disabling the feature in their browser's options.

5.4 E-Mail Communications

Chieftain Energy adheres to a no spam practice. A customer will not receive regular, unsolicited e-mail communications from Chieftain Energy unless such communications are required for the purposes identified in this Policy, to provide a service or information that has been requested, or as otherwise agreed to.

5.5 Tracking

Chieftain Energy may track, gather and evaluate statistical information about users of the Chieftain Energy Website. For example, Chieftain Energy may use third-party software or companies to facilitate a count of the number of times a page is viewed. Personal user information is not collected by any such third-parties, nor is any tracking information generated used for any other purpose than to report Website activity to Chieftain Energy.

5.6 Links to Third-Party Sites

Chieftain Energy's Website may contain links to third-party Websites.

Chieftain Energy is not responsible for;

- Any information you provide to other Websites outside of Chieftain Energy's domain that you access through a link on our Website; or
- The privacy practices or the content of such Websites outside of Chieftain Energy's Website domain.

6.0 Contact Information

Chieftain Energy's Privacy Officer is accountable for compliance with this Policy. Questions or enquiries can be directed to:

Mail: Privacy Officer
150 Condor Road
Whitehorse, YT
Y1A 0M7

Tel: 867-668-4441

Email: privacy@chieftainenergy.com