

FRONTIER'S PRIVACY CODE

Frontier is committed to protecting your privacy and ensuring your personal information remains confidential.

The purpose of our Privacy Code is to inform you about our privacy protection practices and our reasons for collecting your information. Our Privacy Code applies to all aspects of handling your information, including collection, use, retention and disclosure.

What is personal information?

Personal information means information about an identifiable individual such as; name, address, age, marital/family status, SIN number, employment information, compensation/benefit information and financial/banking information. It would also include information such as job performance.

Personal information does not include information that does not identify particular individuals, like aggregate statistics that may be used in market compensation surveys or employee opinion surveys.

Why do we collect, use, retain and disclose your information?

We collect, use, retain and disclose your personal information for the following purposes:

- To administer the terms of your employment agreement including (but not limited to) paying remittances on your behalf to the government (income tax, EI, CCP), directly depositing your pay into your bank account, arranging for your set up on the benefit plans and tracking holiday/sick leave entitlements.
- To assist in making decisions regarding your professional development including training needs.
- To ensure a means of contacting you or your emergency contact person in the event of an emergency.
- Should your personal information be used for reasons other than those listed above you will be notified via e-mail of the change and your consent will be requested prior to the information being used.

How do we collect your information?

When you first join the company we must obtain specific information from you including personal information. We obtain most of this information directly from you. We collect this personal information voluntarily through written, verbal or electronic contact with you. Your consent may be express or implied, depending on the nature of the personal information being collected.

We may have also collected personal information about you from your previous employers by way of reference checks prior to being offered a position with Frontier.

Information on your overall performance is collected twice a year through the performance review process.

When do we disclose information?

We may disclose your personal information in the following circumstances:

- We may disclose your personal information to government regulatory bodies where required by law (i.e. income tax, EI, CPP remittances, Human Rights Commissions).
- We may disclose your personal information to our benefit providers (i.e. Manulife, GWL) in order that they may administer your benefit plans.
- We may disclose limited personal information (i.e. home phone number) to your direct supervisor in the event they have an immediate business related need to contact you at your place of residence.
- In the event of a proposed promotional opportunity we may disclose performance related information to the supervisor/manager involved in the recruiting process.
- We may disclose personal information about you to third parties (including auditors and lawyers) on a confidential basis for the purposes of managing Frontier's business.
- We will not disclose financial information to lending institutions (for mortgage or loan approval) without your consent.

How do we protect your personal information?

We will take all reasonable safeguards that are necessary to protect your personal information, including the following:

- We limit access to your personal information to only Human Resources and payroll.

- All information store on-line is password protected and can only be accessed by HR and Payroll. Hard copy records are kept in locked file cabinets with only HR and Payroll have key access.
- We try to limit the sending of confidential information via e-mail and will password protect the content when required so only the intended recipient can have access to it.
- Confidential information will only be printed at designated HR and Payroll printers.

We will protect the confidentiality of your personal information when dealing with other persons and organizations, by ensuring they are bound, as appropriate, to maintain your confidentiality and not use your personal information for any unauthorized purpose.

We will retain your personal information only as long as it is reasonable required. The retention period may extend beyond the end of your relationship with us but only for so long as it is legally necessary for us to have sufficient information to respond to any issues that may arise at a later date. When your personal information is no longer needed, we arrange to destroy, delete, erase or convert it to an anonymous form.

How do we keep your information accurate?

We will make every reasonable effort to keep your personal information accurate and up-to-date. At any time you may advise us of changes of personal information we have about you in our file so that your information can be updated.

Your personal information should be as accurate, complete and up-to-date as possible in order for us to provide you with the best possible service.

We will make appropriate corrections and make sure they are conveyed to anyone we may have misinformed.

How may you access your information?

At your request we will confirm the nature of your personal information that has been collected, the purpose for which it is being used, to whom it is being disclosed and how long it will be retained. Access to both your hard copy personnel file and our on-line information will be granted to you at your request.

How many you withdraw your consent?

We will collect, use, disclose and retain personal information for the purposes described in this Privacy Code.

However, you have the choice to withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. To do so you must contact Human Resources.

Please be aware that in certain circumstances, withdrawing your consent may limit or restrict our ability to administer the terms of your employment contract.

How do you make privacy related inquiries?

By becoming an employee of Frontier Supply Chain Solutions Inc. you agree to allow your personal information to be collected, used, retained and disclosed as outlined above.

However, if you have questions about privacy or confidentiality, or any concern about the way your personal information is being handled, please contact:

Valerie Chan
Privacy Officer for Frontier Supply Chain Solutions Inc.

We will investigate the matter promptly and will respond to you within 30 days of receiving your inquiry.

If the issue is not resolved to your satisfaction, you may file a complaint in writing to the Privacy Commissioner of Canada.