

## REPSOL OIL & GAS CANADA INC. CANADIAN PRIVACY STATEMENT

Repsol Oil & Gas Canada Inc. (Repsol) gathers and stores personal information about its employees, contractors, suppliers and others to effectively conduct business and comply with legislative and regulatory requirements.

Personal information includes any factual or subjective information about an identifiable individual, with the exception of business contact information (including title, business address, business telephone number or business email address) collected and used for the purpose of contacting an individual in their business capacity.

The collection, use and disclosure of data or information about individuals are subject to provincial and federal laws regarding the privacy of personal information.

Repsol respects the rights to privacy of each individual's personal information and has adopted policies, procedures and practices to protect those rights.

Repsol's Privacy Statement, policies, and practices are based on internationally recognized "Fair Information Principles". In the collection, use, disclosure and retention of personal information, Repsol seeks a balance between an individual's privacy and the exchange of information necessary to do business. It is Repsol's policy to collect and handle personal information in a fair and lawful manner for legitimate business purposes.

Repsol has advised individuals collecting, using or disclosing personal information in the course of their duties on behalf of Repsol of their responsibility to protect the privacy rights of all individuals.

The 10 Fair Information Principles and Repsol's general approach to compliance for each are listed below.

### **1. Accountability**

An organization is responsible for personal information under its control and shall designate an individual to be accountable for the organization's compliance with these principles.

Repsol's Privacy Coordinator reports directly to the Executive Director, North America on privacy matters. When required, other Repsol individuals may be appointed by senior management to act in the place of the Privacy Coordinator.

### **2. Identifying Purposes**

The purposes for the collection of personal information must be identified at or before the time of collection.

All persons collecting personal information on Repsol's behalf are required to be familiar with the purpose for its use. When new purposes are identified, the appropriate level of consent will be obtained prior to use of the information.

### **3. Consent**

The knowledge and consent of the individual are required for the collection, use and disclosure of personal information, except where inappropriate.

Where practical, Repsol will seek express consent (either written or verbal), for the collection, use and disclosure of personal information, especially information that may be considered sensitive. Repsol strives to obtain consent for use in all circumstances except for:

- collection of the personal information is clearly in the interests of the individual,
- investigation of an incident or breach of agreement is ongoing,
- journalistic, artistic or related purposes,
- information that is publicly available,
- in the event of emergency,
- where required by law, including legislation, regulations or order of a competent authority.

### **4. Limiting Collection**

The amount and type of information gathered must be limited to what is necessary for the identified purposes.

Repsol will not collect personal information indiscriminately.

### **5. Limiting Use, Disclosure and Retention**

Information must be used only for the purposes for which it was collected, unless the individual consents to alternate use, or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

Purposes for use of personal information will be identified and documented. Guides for retention and destruction of personal information that is no longer required will be implemented.

### **6. Accuracy**

Personal information shall be as accurate, complete and up-to-date as necessary for the purposes for which it is to be used.

Repsol will foster practices to achieve initial and ongoing accuracy.

## **7. Safeguards**

Personal information must be protected by security safeguards appropriate to the sensitivity of the information.

Repsol will employ methods of protection of personal information including:

- physical measures (e.g., locked filing cabinets and desks, restricted access to floors and offices)
- organizational measures (e.g., security clearance, access by authorized individuals only)
- technological measures (e.g., passwords, encryption)
- Requiring confidentiality from all persons who access confidential personal information held by Repsol.

## **8. Openness**

An organization must make readily available to individuals specific information about its policies and practices relating to the management of personal information.

Repsol will make policies available as appropriate for internal or external enquiries.

## **9. Individual Access**

Upon request an individual must be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Repsol upholds the reasonable right of access and review of personal information and will make request for access to personal information procedures available.

## **10. Challenging Compliance**

Individuals must be able to address a challenge concerning compliance with these principles to a designated individual accountable for the organization's compliance.

Repsol recognizes the rights of individuals to raise any concerns they may have regarding privacy of their personal information. All enquiries will be addressed with a view to early and amicable resolution.

Repsol will review these privacy principles and embodied standards on an ongoing basis to ensure they remain relevant and current with respect to changing privacy legislation.

Repsol's Privacy Coordinator under the direction of the Executive Director, North America is responsible for privacy matters within Repsol and oversees the maintenance, regular review and interpretation of this Privacy Statement and related policies and procedures.

Individuals can gain additional information on privacy from the office of the appropriate privacy commissioner. Relevant offices are identified below:

**Office of the Information and Privacy Commissioner (Calgary)**

Suite 2460, 801 6 Avenue SW

Calgary, AB T2P 3W2

Phone: (403) 297-2728

Fax: (403) 297-2711

Toll-Free: (888) 878-4044

[www.oipc.ab.ca](http://www.oipc.ab.ca)

**Office of the Information and Privacy Commissioner (Edmonton)**

#410, 9925 - 109 Street NW

Edmonton, AB T5K 2J8

Phone: (780) 422-6860

Fax: (780) 422-5682

Toll-Free: (888) 878-4044

[www.oipc.ab.ca](http://www.oipc.ab.ca)

**Saskatchewan Information and Privacy Commissioner**

503 – 1801 Hamilton Street

Regina SK S4P 4B4

Telephone: 306-787-8350

Toll Free Telephone (within Saskatchewan): 1-877-748-2298

Fax: 306-798-1603

Email: [webmaster@oipc.sk.ca](mailto:webmaster@oipc.sk.ca)

**Office of the Privacy Commissioner of Canada**

30, Victoria Street

Gatineau, Quebec

K1A 1H3

Toll-free: 1-800-282-1376

Phone: (819) 994-5444

TTY: (819) 994-6591 [www.priv.gc.ca](http://www.priv.gc.ca)