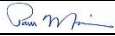




## EMPLOYEE PRIVACY POLICY

Date of Re-Issue:	August 1, 2014
Revise / Review Date:	August 1, 2015
Originally Issued:	October 31, 2013
Approved by:	
	Pamela Mullin, CFO

### PURPOSE

To establish procedures and guidelines implementing requirements for privacy in the workplace and to ensure that employee and independent contractor's personal information is secured, collected, used, disclosed and retained only as may be reasonable and in accordance with the applicable law. This policy applies to the management of personal information in any form whether written/paper form, electronic/computer or oral.

### SCOPE

#### ***Employee/Independent Contractor Information***

KBD collects personal information about employees and independent contractors ("employees") in order to pay them, comply with laws, provide them with benefits, administer performance management tools, and generally to establish, manage or terminate the employment or partnership relationship.

Personal information is also collected from individuals seeking employment with KBD with signed consent.

When KBD collects personal information, employees will be informed of the reasons why such information is required, what use will be made of it, and with whom it may be shared. Collection may occur without knowledge or consent as permitted by law, including collection in the course of an investigation.

All truck drivers will be subject to random drug and alcohol testing. The test results will remain confidential and stored in a locked cabinet.

#### ***Equipment Issued***

All drivers have been issued the following IT equipment:

- Camera:
  - o To record accidents, defend lawsuits resulting therefrom and assure safe driving;
- Cell phones :

- Telephone: Drivers are required to communicate their whereabouts a minimum of twice daily, deal with problems at border crossings in real time, changes in routes, schedules, etc. ;
- Computer and internet access: to enable employees to file forms and reports and to access maps/directions.

If employees use KBD issued IT equipment for personal purposes, the personal communications may be viewed by the management of KBD Transportation:

- If these communications reveal illegal behaviour, KBD Transportation reserves the right to report such behavior to the authorities or to take any other reasonable measures, including disciplinary measures as a result;
- If these communications jeopardize KBD Transportation`s reputation OR violate confidentiality of company information, they may result in disciplinary proceedings or dismissal.

***KBD Premises Surveillance:***

The KBD Transportation building and yard are protected by video surveillance 24 hours/day. Employees viewed on camera displaying any intentional damage to the building or equipment must be aware that this video-taped surveillance will be viewed and may be used to apply progressive discipline leading to possible dismissal, and as applicable in a court of law.

This Privacy Policy is subject to the provisions of all applicable provincial and federal legislation including the Personal Information Protection and Electronic Documents Act (PIPEDA) or any court order or administrative ruling or order.

*Employees have the right to review and obtain a copy of their personal information on record in our office by contacting the Human Resources Department. All requests must be made in writing and will receive a response to their request within 30 days.*