

Stantec values its relationships with our employees, clients and investors and is committed to the protection of their personal information. We are committed to providing excellent service and to ensuring that our relationship with our employees, clients, and investors is conducted with integrity and in a responsible, fair, honest and ethical manner.

Consistent with these objectives, we maintain high standards of confidentiality with respect to the personal information in our possession. We manage personal information in accordance with applicable national, provincial, state and federal legislation, and internationally applicable standards including the EU General Data Protection Regulation ((EU) 2016/679) (GDPR).

We will inform our employees and clients of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that strikes the appropriate balance between one's right to privacy and our need to know in order to deliver the services required to operate our business. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our employees and client's personal information and allowing our employees and clients to request access to, and where appropriate, erasure or correction of, their personal information.

## Practice

### 1.0 Scope of Policy

- 1.1 This Privacy Policy applies to Stantec Inc. and its subsidiaries and affiliates ("Stantec") and sets out how we handle the personal information of our clients, suppliers, employees, workers and other third parties, past or present. Stantec personnel are required to understand and comply with this policy when processing personal information on Stantec's behalf. Any breach of this Privacy Policy may result in disciplinary action.
- 1.2 This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Stantec (including contractors and sub-consultants). It applies to the management of personal information in any form or format, whether oral, electronic or written.

### 2.0 Definition of personal information

- 2.1 'Personal information' means information about an identified or identifiable natural person ('individual'). This includes an individual's name, location data, phone number, age, sex, marital or family status, an identifying number (such as social insurance number or social security number), financial information, educational history, medical information or other factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

### 3.0 Personal Data Protection Principles

- 3.1 Stantec adheres to the principles relating to processing of personal information set out in applicable laws and regulations. In particular, Stantec ensures compliance with terms which require personal information to be:
  - 3.1.1 processed lawfully, fairly and in a transparent manner;
  - 3.1.2 collected only for specified, explicit and legitimate purposes;
  - 3.1.3 adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;

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- 3.1.4 accurate and where necessary kept up to date;
  - 3.1.5 not kept in a form which permits identification of individuals for longer than is necessary for the purposes for which the data is processed;
  - 3.1.6 processed in a manner that ensures its security using appropriate technical and organizational measures to protect against unauthorized or unlawful processing and against accidental loss, destruction or damage;
  - 3.1.7 not transferred to another country without appropriate safeguards being in place; and
  - 3.1.8 made available to individuals and allow individuals to exercise certain rights in relation to their personal information.
- 3.2** Stantec is responsible for and must be able to demonstrate compliance with the data protection principles listed above.

#### **4.0 Lawfulness, Fairness, Transparency of processing personal information**

- 4.1** Stantec ensures personal information is processed lawfully, fairly and for specified purposes in a transparent manner in relation to the individual(s) concerned.
- 4.2** Applicable law restricts our actions regarding personal information to specified lawful purposes. These restrictions are not intended to prevent processing, but ensure that we process personal information fairly and without adversely affecting the individual(s).
- 4.3** The law allows processing for specific purposes, some of which are set out below:
  - 4.3.1 the individual has given his or her Consent (see section 6.0 below);
  - 4.3.2 the processing is necessary for the performance of a contract with the individual concerned;
  - 4.3.3 to meet our legal compliance obligations;
  - 4.3.4 to protect the individual's vital interests;
  - 4.3.5 to pursue our legitimate interests for purposes where they are not overridden because the processing prejudices the interests or fundamental rights and freedoms of the individual(s). The purposes for which we process personal information for legitimate interests will be set out in applicable Privacy Notices.
- 4.4** We ensure we identify the legal ground being relied on for each processing activity.

#### **5.0 Collection of personal information**

- 5.1** In the course of carrying on our business, it is necessary for Stantec to collect and use information about its employees, contractors and clients. Unless the purposes for collecting personal information are obvious and the client, employee or contractor provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 5.2** We collect personal employee information and information about spouses/dependents and only use and disclose it for the following purposes:
  - 5.2.1 To recruit, train, recognize and retain employees. Please refer to our background check policies for further detail;
  - 5.2.2 To maintain a harmonious employment relationship;
  - 5.2.3 To administer our policies and procedures;
  - 5.2.4 To manage and perform our business activities;
  - 5.2.5 To administer compensation and/or benefits;

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- 5.2.6 To manage and promote employee services;
  - 5.2.7 To terminate the employment relationship, when and if that occurs;
  - 5.2.8 To meet legal and regulatory requirements; and
  - 5.2.9 To manage the post-employment relationship.

**5.3** We collect personal information about clients, investors, and members of the public and only use and disclose it for the following purposes:

- 5.3.1 To establish and maintain responsible commercial relations;
- 5.3.2 To understand services and/or project needs;
- 5.3.3 To develop, enhance, market or provide our products and services;
- 5.3.4 To develop and enhance our relationship with investors;
- 5.3.5 To manage and develop our business and operations; and
- 5.3.6 To meet legal and regulatory requirements.

## 6.0 Consent

- 6.1** Where relevant and necessary, we will obtain the individual's consent to collect, use or disclose personal information (except in specific circumstances where collection, use or disclosure without consent is authorized or required by law, as further described in section 4.3 above).
- 6.2** An individual consents to processing of their personal information if they indicate agreement clearly either by a statement or positive action to the processing. If Consent is given in a document which deals with other matters, then the Consent must be kept separate from those other matters.
- 6.3** Individuals must be easily able to withdraw Consent to processing at any time and withdrawal must be promptly honored. When we receive such a notice, we will inform the individual of the likely consequences (if any) of changing or withdrawing his/her consent. Consent may need to be refreshed if we intend to process personal information for a different and incompatible purpose which was not disclosed when the individual first consented.
- 6.4** We will keep appropriate records of Consents so that Stantec can demonstrate compliance with applicable law.

## 7.0 Using and Disclosing Personal Information

- 7.1** We will only collect and use or disclose personal information where necessary to fulfill the purpose identified at the time of collection, except as authorized by law. We will ensure any personal information collected is adequate, relevant and limited to what is necessary for the intended purposes.
- 7.2** We will not use or disclose personal information for any additional purposes unless we obtain consent to do so, except as authorized by law. Where international transfers of personal information are proposed, Stantec personnel must seek the advice of Corporate Counsel and, where relevant, the Privacy Officer, prior to such transfers taking place.
- 7.3** We will not sell personal information to other parties.

## 8.0 Ensuring Accuracy of Personal Information

- 8.1** We will make reasonable efforts to ensure that personal information is accurate, complete and kept up to date. We will take reasonable steps to amend or destroy

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inaccurate or out-of-date personal information.

- 8.2** Individuals may request a correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 8.3** A request to correct personal information should be forwarded to the Privacy Officer at: [privacy@stantec.com](mailto:privacy@stantec.com).

## 9.0 Securing Personal Information

- 9.1** We are committed to ensuring the security of personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification, loss or destruction or similar risks.
- 9.2** We will protect personal information using technical and organizational measures in compliance with local laws that are appropriate to the sensitivity of the information, the size, scope and nature of our business, our available resources, the amount of personal information that we own or maintain on behalf of others and identified risks . Our Confidentiality Policy, Background Checks Policy, Records Management Policy, Quality Management System and our Acceptable Use of Technology Policy, address specific types of personal information and the respective safeguards that are in place for such information.
- 9.3** We have put in place procedures to deal with any suspected data breach and will notify affected individuals or any applicable regulator where we are required to do so by law.
- 9.4** Anyone becoming aware of, or suspecting a personal data security breach must notify the Privacy Officer ([privacy@stantec.com](mailto:privacy@stantec.com)); local Corporate Counsel and the information technology or IT security team. All evidence relating to the actual or suspected breach should be maintained.

## 10.0 Retaining Personal Information

- 10.1** Personal information will be kept in an identifiable form for no longer than is necessary for the purposes for which the data is collected and processed. We will maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction.
- 10.2** We will take all reasonable steps to destroy or erase from our systems personal information that we no longer require in accordance with applicable records retention schedules and policies. This includes requiring third parties to delete that data where applicable.
- 10.3** Further information on our records retention and destruction policies can be found in our Records Management Policy.

## 11.0 Individuals' Rights and Requests

- 11.1** Individuals ('data subjects') have rights when it comes to how we handle their personal information. According to the applicable law, these may include rights to:
  - 11.1.1 withdraw Consent to personal data processing at any time;
  - 11.1.2 receive certain information about our processing activities;
  - 11.1.3 request access to their personal information that we hold;
  - 11.1.4 prevent our use of their personal information for direct marketing purposes;

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- 11.1.5 ask us to erase personal information if it is no longer necessary in relation to the purposes for which it was collected or processed or to rectify inaccurate data or to complete incomplete data;
  - 11.1.6 make a complaint to the supervisory authority; and
  - 11.1.7 in limited circumstances, receive or ask for their personal information to be transferred to a third party.
- 11.2** We will verify the identity of an individual requesting data under any of the rights listed above.
- 11.3** Any request received in relation to personal information should be forwarded to the relevant department and copied to the Privacy Officer (privacy@stantec.com) and we will comply with the company's Data Subject Request process.

## **12.0 Accountability and handling privacy complaints**

- 12.1** We will apply appropriate technical and organizational measures to ensure compliance with the law and principles of data protection. These measures include:
- 12.1.1 appointing a Privacy Officer to oversee our compliance;
  - 12.1.2 carrying out impact assessments where processing presents a high risk to rights and freedoms of individuals;
  - 12.1.3 integrating data protection into internal documents including this Privacy Policy and our Privacy Notices;
  - 12.1.4 regularly training Stantec Personnel on privacy and data protection matters; and
  - 12.1.5 conducting periodic reviews and audits to assess compliance.
- 12.2** An individual who believes that Stantec has not complied with this Policy has a right to make a written complaint about the matter to Stantec's Privacy Officer by email to: privacy@stantec.com.
- 12.3** When a complaint is received, the Privacy Officer will record the date of receipt, promptly acknowledge receipt and contact the complainant to clarify the complaint, if necessary.
- 12.4** We will investigate and attempt to resolve all complaints within 30 working days. An officer of the organization with appropriate authority to deal with the complaint will investigate and attempt to resolve the matter. If the complaint is found to be justified, we will take appropriate steps to resolve the complaint including, if necessary, amending our Policy and correcting any related procedures.
- 12.5** The complainant will be expected to provide full details of how the complaint arose, including the identification of the parties involved, if known, copies of any relevant documentation and reasons why the complainant believes his or her privacy may have been breached.