



Use of Personal Information Policy

Policy Statement

Where Personal Information of Individuals and Workers is collected, used and disclosed to authorized third parties as part of administering the employment or contractual relationship, subject to the privacy legislation in each Jurisdiction in which we operate. Individuals have the right to know about and consent in the collection, use and disclosure of this information. AC Security Inc. will comply with privacy legislation within each jurisdiction in which we operate.

Policy Scope

This Policy applies to everyone who works or contracts with AC Security Inc. or its Subsidiaries, (collectively AC Security Inc.), including all regular full-time, part-time, fixed term, casual employees, officers, directors, contractors, executives, consultants (of any scope) and their employees, and any individual associated with AC Security Inc. Workplaces who are required to provide personal information to AC Security Inc. or its Subsidiaries.

Definitions

Workplace: is any business, residence, client premises, internal or external, land or otherwise publicly known location where AC Security Inc. conducts its business.

Personal Information: is any information that can be used alone or with other information to identify a specific person. AC Security Inc. collects, uses and discloses various types of personal information in respect of people who apply to and/or are hired by and/or in contract with through personal or third-party to AC Security Inc.. This includes:

- Home address, telephone number or personal/work email
- Resumes, cover letters and employment applications
- References and interview notes
- Education and work history
- Photographs and videos
- Offer letters
- Background checks or record checks
- Payroll information including but not limited to social insurance number, banking information, date of birth
- Medical history or conditions
- Employment benefits information
- Emergency contact information
- License, passport or other government issued identification

Why is Personal Information Collected?

Personal Information is collected, used and disclosed for business purposes, including establishing, managing or ending employment or contractual relationship with AC Security



Inc., or for the purpose of identifying, tracking and monitoring individuals who pose a threat to or impact to AC Security Inc. Workers, or its Workplaces.

This includes:

- Determining eligibility for employment, or contract status, including the verification of references and qualifications.
- Administering pay and benefits
- Processing employee work-related claims (i.e. disability, worker compensation, insurance claims etc.)
- Establishing a contact point in the event of an emergency
- Process expense reimbursements
- Complying with applicable labour or employment statutes.
- Conducting investigations into allegations of policy breaches
- Ensuring the security of company-held information
- Complying with applicable local law
- Assessing threats; including violence in the workplace
- Entry point access

Collection, Use and Disclosure

AC Security Inc. collects only what is required in order to fulfill an employment or contractual relationship. Personal Information may be disclosed to appropriate internal and external parties where required, through hard copy, digital, online or cloud-based application. External parties may include third party service providers engaged by AC Security Inc. or its Subsidiaries, or parties to whom AC Security Inc. is required to disclose information by law, such as a tax regulator or other government bodies. Any such information is transmitted in accordance with standards set out in the AC Security Inc. Policy. Personal Information that has been collected by AC Security Inc. will not be used or disclosed for a purpose not previously identified without the individuals consent unless the law requires a purpose or disclosure.

Systems and Premises Access

AC Security Inc. takes reasonable measures to monitor, record and investigate access of its systems, buildings, and any area by which AC Security Inc. conducts business, including the monitoring of activity on closed-circuit television cameras (managed by AC Security Inc. or any third-party) where necessary and where permitted by law.

Medical Information

Medical and benefits information is not kept in an AC Security HR File. It is collected and maintained by the third-party insurer or administrators who manage all medical and disability claims on AC Security Inc.'s behalf. All personal medical and disability information shared by an AC Security Inc. employee in the course of coordinating a disability claim or answering queries regarding a medical claim is kept separately and securely by the Benefits Administrators within the HR department.



Retention

Personal Information is kept only as long as necessary.

This means:

- The identified purpose for which it was collected, or
- The time period required by law, whichever is longer

Personal information that is no longer required will be destroyed in a secure manner. Generally any document, regarding pay, benefits, vacation, attendance, performance, location activity, must be retained for as long as the individual is employed and for a minimum of seven years thereafter, or any longer period as required by law.

Safeguards

Appropriate security safeguards are in place to protect personal information against loss or theft, or unauthorized access, disclosure, copying, use or modification.

Methods of protection include physical, organization, technological, and contractual measures. All AC Security Inc. employees must complete annual privacy training and acknowledge adherence to AC Security Inc.'s Code of Conduct.

AC Security Inc. Workers may only access sensitive AC Security Inc. worker personal information where required to perform their role, and must understand their responsibility to protect, safeguard and use the information.

Accuracy

AC Security Inc. will ensure that information is sufficiently accurate, complete and current to meet required purposes and reduce the possibility that decisions are made using incorrect information.

Individual Access

AC Security Inc. maintains digital and paper based HR files in which AC Security Inc. workers employment related information is kept.

- Upon request, an individual can be provided a statement of, and/or provided access to their own personal information maintained by AC Security Inc. Exceptions may apply where disclosure would reveal information that cannot be separated about a third party, or where legislation protects disclosure of such information.
- AC Security Inc. will respond to individual requests as reasonably as possible
- Where an individual can show that the personal information collected is inaccurate or incomplete, AC Security Inc. will take the necessary steps to correct the information.



Complaints Process

Inquiries or complaints about this policy and handling of personal information should be directed to the Privacy Mailbox: Privacy@ACsecurity.com

AC Security Inc. will investigate the complaints about policies and practices related to the handling of personal information, and where justified, will take appropriate measures to resolve the issues.

January 1, 2023

Effective Date

January 1, 2023

Revised Date