



**BREWERS DISTRIBUTOR LTD.
POLICIES & PROCEDURES**

SECTION NUMBER: 100
ITEM NUMBER: 171

DATE: March 13, 2009

Policy Topic:

Privacy of Employee Personal Information

Applies To:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Management | <input checked="" type="checkbox"/> Union |
| <input checked="" type="checkbox"/> Administration | <input checked="" type="checkbox"/> Non Union |
| <input checked="" type="checkbox"/> Warehouse | |

Policy Summary:

This policy promotes compliance with all laws relevant to protecting employees' personal information provided to BDL as required for conducting its business activities.

Statement:

At BDL we recognize the importance of privacy in relation to the personal information we receive in the course of your employment. We are committed to respecting employees' right to privacy. We attempt to ensure the accuracy, confidentiality and security of such information. This policy describes, in general terms, the principles we apply when protecting employee personal information in our custody or control.

Application:

This policy applies to all employees of BDL, without exception.

Employee Personal Information:

We are committed to respecting employees' right to privacy. We acknowledge the sensitivity of the personal information which may be provided to us in the course of our business or in the establishment, management or termination of an employment relationship. We recognize that ensuring the accuracy, confidentiality and security of your personal information in our custody or control is a joint responsibility between the Company and its employees.

We will obtain consent to collect, use or disclose employee personal information, where such consent is required by law. Consent can be implied where the purpose for collecting, using or disclosing the personal information would be obvious to an employee or prospective employee who provides such information.

We collect, use and disclose employee personal information without consent if it is reasonable for the purposes of establishing, managing or terminating an employment relationship between the Company and an individual, or where otherwise permitted by law.



Information Collected:

BDL collects, uses and discloses employee personal information that is reasonably needed to establish, manage or terminate an employment relationship with the Company. We collect personal information from employees such as: name, residential address, home phone number, SIN, date of hire, tax credit information, banking information, gender, date of birth, family status and dependent information, emergency contacts, wage/salary levels, previous employment history and any job-related information. Medical information may also be collected for Workers' Compensation or insurance benefit purposes, or for managing the employment relationship.

Where practical, we endeavour to collect employee personal information directly from the person to whom the information relates. When necessary, the Company will collect employee personal information from other sources.

Use of Personal Information:

We collect, use and disclose employee personal information that is reasonably needed to establish, manage or terminate an employment relationship with BDL. For example, personal information collected by BDL will be used to:

- Identify you;
- Pay you for work performed;
- Provide benefits to you and your family, as applicable;
- Provide job feedback and training;
- Ensure the quality of your work;
- Communicate with you on Company and work-related matters;
- Fulfill requests as required and authorized by law.

We limit the collection of personal information to that which is necessary for identified purposes and as permitted by law.

We do not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law.

We may disclose employee personal information to third parties to, for example: report earnings information, provide benefits or share information with union representatives, as may be applicable.

BDL will disclose personal information if ordered to do so through a legal inquiry, warrant or other legal order, or as otherwise required by law.



Accuracy and
Access:

We acknowledge the sensitivity of the personal information which may be provided to us in the course of our business or in the establishment, management or termination of an employment relationship. We recognize that ensuring the accuracy, confidentiality and security of your personal information in our custody or control is a joint responsibility between the Company and its employees.

Employees of BDL may access their personal information to ensure it is up to date, complete and accurate. Employees are to contact a Human Resources representative in writing should they desire access to their personal information. Access will be provided within a reasonable timeframe.

Security:

Employee personal information such as personal file documents, benefit records and payroll information is kept in secure areas, in locked cabinets. Electronically stored information is password protected. Access to this information is limited to those whose functions require it.

BDL Privacy
Officers:

BDL Privacy Officer(s) shall be appointed by the senior administration of the Company to oversee compliance with privacy laws.

The Privacy Officer(s) will be the contact person(s) for privacy complaints and requests. If you have a complaint about privacy compliance, please contact us by writing to:

Corporate Privacy Officer
Brewers' Distributor Ltd.
11500 - 29 Street SE
Calgary, Alberta
T2Z 3W9

Fax: (403) 253-3241

Posting of Privacy
of Personal
Information Policy:

The Policy shall be posted at all BDL facilities. It is the responsibility of the respective department and/or facility manager(s) that the Policy be properly posted and adhered to.

Approved:

A handwritten signature in dark ink, appearing to read "Garry Clermont".

Garry Clermont, President

Date:

MARCH 23RD 2009