



EMPLOYEE PRIVACY POLICY - CANADA

Our Commitment to Our Employees

Saint-Gobain is committed to respecting employee privacy and we recognize our employees' need for appropriate protection and management of any personal information (information about an identifiable individual) regarding our employees.

Saint-Gobain has established this privacy policy so that our employees can understand the care taken with respect to personal information collected, used and disclosed by Saint-Gobain.

The policy also addresses various key issues associated with the collection, use and disclosure of personal employee information (as defined below).

Privacy Commitment

Saint-Gobain is responsible for the protection of personal information and the fair handling of it at all times, throughout the organization and in dealings with third parties by meeting the standards set by law. Care in collecting, using and disclosing personal information is essential to continued employee confidence and goodwill. As such, the company will make reasonable efforts to ensure that:

- Its policies and procedures are consistent with all applicable federal and/or provincial or territorial privacy laws regarding collection, use and disclosure of, access to, and the protection of, personal information.
- That it has appropriate express or implied consent to the collection, use or disclosure of any personal information, unless such consent is not required by law.
- When personal information is transferred to third parties for processing, Saint-Gobain will obtain assurances from the company that the personal information will be protected in the same manner as if the information was being processed by Saint-Gobain directly.
- It will apply this policy to all employees of Saint-Gobain and other individuals involved in Saint-Gobain's operations, who have access to personal information.

Definitions

- Personal information means information that relates to a natural person and allows that person to be identified, but does not include the name, title or business address or business phone number or email of an employee. For example, it would include a person's social insurance number, home address, salary, dependents, or personal health information. Personal



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information does not include work-product created by an individual, unless the work-product is about another individual, in which case it may contain that other person's personal information.

- Personal employee information means personal information about an individual that is collected, used or disclosed in order to recruit, hire, establish, manage or terminate an employment relationship, but does not include personal information that is not about an individual's employment. For example, it could include information such as an employee's discipline history, or video surveillance of the employee, to the extent recognized by law. Consent is not required for the collection, use and disclosure of such employee personal information solely for reasonable purposes related to recruiting, managing or terminating employees. However, in the case of an individual who is a current employee of the organization, the organization will, before collecting, using or disclosing the information, provide the individual with reasonable notification that personal employee information about the individual is going to be collected, used or disclosure and of the purposes for which the information is going to be collected, used or disclosed.

Protection of Personal Privacy

Identifying the Purpose:

- Unless the purpose is obvious, when collecting personal information or establishing a file on an employee, Saint-Gobain will, to the extent required by law, make reasonable efforts to inform the employee of the nature of the information that is collected, the purposes for which the information is collected, the use which will be made of the information collected, the categories of persons who will have access to it within Saint-Gobain, the location where the information will be kept, and the rights of access and correction. Depending on the circumstances, this notification may be provided orally or in writing.
- In the event of a sale or proposed sale of all or a part of Saint-Gobain to another company, personal employee information may be disclosed to the prospective purchaser as part of the pre-transfer process. If a proposed sale is completed, information related to employees will be transferred as part of the overall transfer. If a proposed sale is not completed, Saint-Gobain will obtain assurances that the relevant personal employee information is either returned or destroyed.

Consent

- Consent requirements may vary depending upon the circumstances and upon whether the information is personal information or personal employee information that Saint-Gobain intends to collect, use or disclose. Saint-Gobain will comply with the requirements of the law regarding consent. For illustration purposes, an example of when consent is not required is when Saint-



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Gobain is investigating the alleged misconduct of an employee where the collection of the information is reasonable for the purposes of an investigation.

- If consent is required, Saint-Gobain will determine which form of consent is appropriate. Consent may be express, implied or deemed not required by law.
- As required by law, Saint-Gobain may seek the employee's consent to collect, use, or disclose personal information for a new purpose not originally identified (see "Identifying the Purpose").
- Saint-Gobain may require, as a condition of employment, that an employee or prospective employee consent to the collection, use, or disclosure of information that it requires, to the extent allowed by law.

Collection:

- Saint-Gobain will limit the collection of personal information to that which is needed for the legitimate purposes identified and for which consent has been obtained (if consent is required), to the extent allowed by law.

Use and Disclosure:

- Saint-Gobain will only use or disclose personal information for the purposes that were identified to the employees concerned and for which consent has been obtained, to the extent that either consent or identification of the purpose is required by law, as described under the headings "Identifying the Purpose" and "Consent", or if the use or disclosure is otherwise authorized by law.
- Personal information collected in one business unit of Saint-Gobain may be shared with other business units of Saint-Gobain for the purposes as identified or allowed by law.
- Saint-Gobain will compile and disclose personal employee information to a limited number of third parties, and to those we are obliged to do so by law, in order to administer staffing, compensation and benefits programs, or when the employee has provided written consent to the disclosure of personal information (see Appendix "A").
- Although Saint-Gobain will protect and limit the use of personal information about employees that is disclosed to third parties as required or allowed by law, Saint-Gobain is not responsible for the subsequent uses or disclosure of the subject personal information by the third-party recipient such as government agencies (for example, the Canada Revenue Agency).



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Retention:

- Personal information will be retained only as long as necessary for the fulfillment of the purposes for which it was collected, except where a longer retention period is required or allowed by law.
- Personal information that is no longer required to be retained to fulfill the identified purposes or object of the file, and provided that retention is no longer necessary for legal or business reasons, will be destroyed, erased, or made anonymous, to the extent required by law.

Accuracy:

- Saint-Gobain will make reasonable efforts to ensure that the personal information collected, used or disclosed by or on behalf of Saint-Gobain is as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used, to the extent required by law.

Safeguards:

- Saint-Gobain will protect personal information by making reasonable security arrangements to prevent the risk of unauthorized collection, access, use, disclosure, copying, modification, disposal or similar risks to maintain confidentiality of personal information in its custody or under its control.
- All personal information will be maintained on a “need to know” basis, such that authorized employees of Saint-Gobain will only have access to the information if it is needed for the performance of their duties or the execution of their mandates.

Access to and Correction of Information:

- Saint-Gobain supports the employee’s right of access to, and the right to request correction of, personal information about themselves. All requests for access to information will be provided according to this policy and those procedures used in the department or office that has custody of the information.
- The right of access does not extend to information excepted from disclosure under the law. However, if that information can reasonably be severed from a record containing information about the applicant, an applicant has the right of access to the remainder of the record. If a request for access is refused, written reasons will be provided outlining the basis for the refusal at law, the name of the person at Saint-Gobain who can answer questions about the refusal, and the recourses open to the employee under the applicable privacy legislation.
- An employee may challenge the accuracy and completeness of the information and have it amended if appropriate. If, in Saint-Gobain’s view, the information is accurate, the employee may annotate the information at issue with comments related to the alleged inaccuracy.



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- The right of access to a requesting employee's own employee personal information will not be subject to any fee, to the extent required by law. Otherwise, personal information may be accessed and corrected free of charge, but obtaining a copy may be subject to the payment of a fee. If a fee is required, Saint-Gobain will provide a written estimate of the fee prior to providing the service, and may require a payment of a deposit before providing the service.
- Access or correction requests must be made in writing to Saint-Gobain Gypsum Canada, Human Resources, and contain sufficient detail to enable Saint-Gobain to identify the individual and personal information or correction sought (see Appendix "B"). Saint-Gobain will respond to your request within 30 days.

Responsibilities:

- Management and employees are jointly responsible for maintaining the confidentiality of general and personal information according to the policies above and they are required to ensure that personal information is maintained in a secure environment. Violations of this policy may result in disciplinary penalties being imposed up to and including termination with cause.

Addressing your concerns

Saint-Gobain will provide specific information about its personal information handling policies and practices, such as the complaint procedure, to any employee upon request. If you have any questions, concerns or problems about privacy, confidentiality, the collection, use or disclosure of your information, or how a request for information was or will be handled, you can contact your immediate supervisor. If the concerns are not immediately resolved to your satisfaction, it will be referred to the designated Privacy Officer. Saint-Gobain has designated this individual to be responsible for overseeing compliance with privacy laws and our own policies about employee privacy information. The Privacy Officer will investigate the individual's concerns and will attempt to resolve any complaint as expeditiously and as fairly as possible. If a complaint is found to be justified, Saint-Gobain will take appropriate measures, including, if necessary, amending its policies and practices. If a complaint is not found to be justified, the individual will be informed of this conclusion and of the right to seek redress with the local Office of the Privacy Commissioner.

The complaint procedure will be made known to any individual expressing concerns and will be personally explained to the individual if circumstances warrant.

If you wish to mail, fax or email us, please include your full name, address and telephone number. You may contact us in one of the following ways:

- Fax at (905) 823-1729 OR;
- by regular mail to:
The Privacy Officer



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Saint-Gobain Gypsum North American Services Inc.
2424 Lakeshore Road West Mississauga,
ON L5J 1K4

You may also contact The Office of the Privacy Commissioner of Canada, or the Privacy Commissioner located in the province in which you work for more information about the privacy requirements that apply in your province.