



Privacy Policy

Heritage Resource Limited Partnership (“Heritage Royalty” or the “Company”) is committed to protecting and maintaining the confidentiality, security, and accuracy of the Personal Information of its officers, directors, employees, and contractors (all-inclusive referred to as “Representatives”) and other third parties that is collected, in its possession, used or under its control, and/or disclosed as a result of normal business operations.

This Policy will be reviewed annually by the Company’s Advisory Board and updated as required.

PURPOSE

The Company collects, uses, and discloses Personal Information about its Representatives, lessees, suppliers, and others with whom it has contact in the course of conducting its normal business operations, including for purposes of establishing, managing, or terminating employment and contractual relationships between Representatives and the Company. This privacy policy (the “Policy”) describes and governs the collection, use, and disclosure of Personal Information by the Company.

This Policy and its related practices apply to the Company, and to each individual that acts as a Representative or prospective Representative of the Company, as a condition of their employment with the Company as well as any other individuals, including third parties, that may have access to Personal Information in the Company’s possession.

When a Representative, customer or supplier provides the Company with Personal Information, that individual consents to the Company’s collection, use, and possible disclosure of their Personal Information and agrees to the terms for accessing and correcting such Personal Information as described below.

The Policy governs the Company’s activities that are subject to the provisions of applicable privacy legislation, including the Personal Information Protection and Electronic Documents Act (Canada) and, where applicable, its equivalent in each province, including the Personal Information Protection Act (Alberta).

DEFINITIONS

For purposes of this Policy:

- A. **“Personal Information”** Information, recorded in any form, about an identifiable individual, including, but not limited to: (i) for employees: name, home address, email address and phone number, names of partners and spouses, birthday, social insurance number, performance appraisals, medical and benefit information, or hobbies and interests; and (ii) for lessees: credit information or billing and payment records. Personal Information does not include the business name, business title, business address, or business contact information i.e. telephone/facsimile number or business email address, when used for business communications. Also, it does not include anonymous, aggregated or non-personal information, or statistical data (i.e. information that cannot be associated with or tracked back to a specific individual).

B. **“Representatives”** Directors, Officers, Employees, or Contractors of the Company.

RESPONSIBILITY FOR COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION

Personal Information

The Company collects and maintains different types of Personal Information about individuals with whom it interacts (such as those who seek to be, are, or were employed by the Company, lessees, or suppliers), including:

- Identification and contact information: such as a Representative's name, home address, telephone, personal email address, date of birth, social insurance number, marital and dependents status, videos, photographs, and beneficiary and emergency contact information.
- Employment information: such as a Representative's job title, resume and/or applications, interview notes, letters of offer and acceptance of employment, compensation and benefit information, background verification information, drivers' abstracts, employment references, mandatory policy acknowledgement sign-off sheets, and performance evaluations.
- Benefit information: such as forms relating to the application or change of employee health and welfare benefits, including but not limited to health care, life insurance, short and long term disability, and medical and dental care.
- Payroll and financial information: including but not limited to social insurance number, wages, pay cheque deposit information, pension information, group savings plans information, and tax related information.
- Business relationship and operations information: such as credit information, billing and payment records, shareholder contact information and requests, agreement terms and preferences, property holder information necessary for administration of our leases and operations, and information necessary to effect emergency response plans.
- Other information necessary for the Company's business purposes, which may be voluntarily disclosed or collected in the course of a Representative's application for, and employment with the Company.

Generally, and to the maximum extent possible, the Company collects Personal Information directly from the individual it pertains to. If third parties hold information the Company requires, the Company will ensure the information has been collected with the appropriate consent. Where permitted or required by applicable law or regulatory requirements, the Company may collect Personal Information about an individual without their knowledge or consent.

Collection Rationale

The Company collects Personal Information to manage and develop its business and operations, including:

- determining eligibility for initial employment, including the verification of references and qualifications;
- the distribution of an internal phone directory (which may include additional information such as date of birth and names of spouse);
- administration of pay and benefits;
- establishing training and/or development requirements and assessing qualifications for a particular job or task;
- performance reviews and determining performance requirements;
- processing employee work-related claims (e.g. worker compensation, insurance claims, etc.);

- evidencing for disciplinary action, or employment termination;
- establishing, managing and terminating business relations with lessees and suppliers;
- protection against error, fraud, theft, damage, or nuisance relating to the Company's assets, operations or reputation and securing company-held information;
- undertaking environmental, health, and safety activities, including incident planning, emergency response and investigation;
- compliance with individual requests;
- compliance with applicable law or regulatory requirements; and
- any other reasonable purpose required by the Company and to which an individual consents.

Use or Disclosure of Personal Information

The Company may use and disclose Personal Information provided it is reasonably required in the following circumstances:

- for purposes described in this Policy;
- where the information is publicly available;
- where necessary to protect the rights and property of the Company;
- when emergencies occur or where it is necessary to protect the safety of a person or group of persons;
- where required by Representatives and other parties (including its related business entities or affiliates) who require Personal Information to assist in establishing, maintaining and managing the Company's relationship with an individual, including, for example, third parties that provide services to the Company or on the Company's behalf, or third parties that collaborate with the Company in the provision of services to an individual;
- where required by third party, in the event of a change in ownership of or granting of security interests in all or a part of the Company through, for example, some form of merger, purchase, sale, lease, amalgamation or other form of business combination, provided that the parties are bound by appropriate agreements or obligations which require them to collect, use or disclose Personal Information in a manner consistent with the use and disclosure provisions of this Policy, unless an individual otherwise objects; or
- the Company has otherwise obtained an individual's consent.

The Company may use or disclose Personal Information without an individual's knowledge or consent where it is permitted or required by applicable law or regulatory requirements to do so, including, but not limited to, circumstances relating to the establishment, maintenance or termination of an employment relationship.

The Company is not in the business of selling Personal Information to third parties.

Protection of Personal Information

The Company endeavours to maintain physical, technical, and procedural safeguards that are appropriate to the sensitivity of the Personal Information in question. These safeguards are designed to prevent Personal Information from loss and unauthorized access, copying, use, modification or disclosure. Examples of these safeguards include: passwords, encryption, and other electronic security means, locked or limited access to premises and file cabinets, and other security monitoring methods.

Accountability

The Company is accountable for maintaining and protecting Personal Information in our control.

Retention of Personal Information

Except as otherwise permitted or required by applicable law or regulatory requirements, the Company endeavours to retain Personal Information only for as long as it believes is necessary to fulfill the purposes for which the Personal Information was collected (including for the purpose of meeting any legal, accounting or other reporting requirements or obligations). The Company may, instead of destroying or erasing Personal Information, make it anonymous such that it cannot be associated with or tracked back to a specific individual.

Updating Personal Information

It is important that Personal Information contained in the Company's records is both accurate and current. The Company asks that Representatives, lessees, and suppliers keep us informed of any changes to Personal Information during the course of the individual's employment or business relationship with the Company.

If an individual believes their Personal Information held by the company is not correct, the individual may request an update of that information by making a request to the Company's Compliance Officer using the contact information set out in the Company's Whistleblower Policy. In some circumstances the Company may not agree with the request to change an individual's Personal Information and will instead append an alternative text to the record in question.

The Company shall maintain Personal Information in as accurate, complete, and up-to-date form as is necessary to fulfill the purposes for which the information is to be used.

Accessing Personal Information

An individual may ask to see the Personal Information that the Company holds about them. If someone wants to review, verify, or correct their Personal Information, they may contact the Company's Compliance Officer. Please note that any such communications must be in writing.

When making an access request, the Company may require specific information from an individual to confirm their identity and right to access, as well as to search for, and provide that individual with, the Personal Information that it holds about them. The Company may charge a fee to access Personal Information, but it will advise of any fee charges in advance. The Company's Compliance Officer is available for help or questions regarding the preparation of a request. Where Personal Information will be disclosed to an individual, the Company will endeavour to provide the information in question within a reasonable time and no later than 30 days following the request.

An individual's right to access the Personal Information that the Company holds about them is not absolute. There are instances where applicable law or regulatory requirements permit or require the Company to refuse a Personal Information access request. The Company also reserves the right to decline to provide access to Personal Information where the information requested:

- Would disclose the following:
 - Personal Information, including opinions, about another individual or about a deceased individual;
 - Confidential Information that may harm the Company or competitive position of a third party, or interfere with contractual or other negotiations of the Company or a third party;
- Is subject to solicitor-client or litigation privilege;
- Is not readily retrievable and the burden or cost of providing such information would be disproportionate to the nature or value of the information;
- Could reasonably result in:
 - Serious harm to the treatment or recovery of the individual concerned;
 - Serious emotional harm to the individual or another individual;
 - Serious bodily harm to another individual; or

- May harm or interfere with law enforcement activities and other legal or employment related investigative or regulatory functions;

In addition, the Personal Information may no longer exist, may have been destroyed, erased or made anonymous in accordance with the Company's record retention obligations and practices.

In the event that the Company cannot provide an individual with access to their Personal Information, it will endeavour to inform that individual of the reasons why access has been denied, subject to any legal or regulatory restrictions.

Consent

It is important to the Company that it collects, uses or discloses Personal Information with consent to do so or as otherwise provided in this Policy. Depending on the sensitivity of the Personal Information, consent may be implied, denied (using an opt-out mechanism), or expressed.

- Express consent can be given orally, electronically, or in writing.
- Implied consent is consent that can reasonably be inferred from an individual's action or inaction. For example, when financial information is requested for investment purposes, the Company will assume consent to the collection, use, or disclosure of Personal Information for purposes related to that request for information or for other purposes identified by the requesting individual at the time.

Typically, the Company will seek consent at the time it collects the Personal Information. In some circumstances consent may be obtained after collection but prior to the Company's use or disclosure of Personal Information. If the Company plans to use or disclose Personal Information for a purpose not previously identified (either in this Policy or separately), it will endeavour to advise an affected individual of that purpose before such use or disclosure.

The Company may collect, use, or disclose Personal Information without an individual's knowledge or consent where it is permitted or required to do so by applicable law or regulatory requirements.

The Company assumes that, unless it is advised otherwise, by receiving a copy of this Policy or by continuing to engage in business with the Company, an individual will have consented to the collection, use, and disclosure of their Personal Information as explained in this Policy.

An individual is entitled to change or withdraw their consent at any time, subject to legal or contractual restrictions (and reasonable notice), by contacting the Compliance Officer using the contact information set out in the Company's Whistleblower Policy. In some circumstances, a change in or withdrawal of consent may limit the Company's ability to provide products or services to, or acquire products or services from, that individual.

Monitoring

The work output of Representatives, whether in paper record, computer files, or in any other storage format belongs to the Company, and that work output, whether it is stored electronically, on paper, or in any other format, and the tools used to generate that work product, are always subject to review and monitoring by the Company.

Representatives should not have any expectation of privacy with respect to their use of the Company's equipment or resources. This section is not meant to suggest that all Representatives will be monitored or their actions subject to constant surveillance – as the Company has no duty to monitor – it is meant to bring to each Representative's attention the fact that such monitoring may occur and may result in the collection of Personal Information from Representatives (e.g. through their use of the Company's resources).

Any collection of Personal Information held or used in the course of monitoring will not be more than is necessary for the purpose of the monitoring. Monitoring is or will be done on an "as required" basis and will be in proportion to the risks that the Company faces. The Company will conduct any monitoring in the

least intrusive way possible. In some instances, when reasonably necessary, the Company may supplement this monitoring notice with more specific policies or statements as appropriate (e.g. video surveillance).

Heritage Royalty External Website

The Company understands the importance of protecting the privacy of its website visitors and is transparent in disclosing how information from visitors is gathered and used.

When someone visits the Company's external website (www.heritageroyalty.ca), web servers automatically gather anonymous information that allows the site to communicate with the visitor's computer during the visit. The Company uses website analytics software to track the number of visits to the site, which pages of the site visitors select, for how long they remain on each page, demographic information such as age and gender, as well as information about what country the visitor is in and what links they clicked to get to the site (i.e. how they found the site). This is not a comprehensive list and the information gathered is subject to change based on the information available from its website analytics software. The information gathered is used for statistical purposes that help the Company improve and administer the site. That information does not include Personal Information that could identify and locate individual visitors.

Privacy concerns focus on Personal Information, that is, information that could identify a specific individual or entity such as names, email addresses, and telephone numbers. Visitors who complete any form or submit other information to through the external website may provide Personal Information to the Company. With visitor consent, the Company may collect and use that Personal Information to provide services or communicate for other purposes.

The Company's external website contains links to third party websites that Heritage Royalty does not own or maintain. The Company makes no representations or warranties about the privacy practices of those sites.

There will be occasions where it will be necessary for the Company's website to disclose Personal Information to third parties. Communicating via the internet and sending information, products, and/or services by other means necessarily involves Personal Information passing through or being handled by third-parties. The Company does not use or distribute any Personal Information to third parties for purposes of allowing these third parties to market their products and services. Visitors may remove or modify Personal Information so as not to receive future communications.

The Company's website operates secure data networks that are designed to protect the privacy and security its visitors.

GOVERNANCE

Interpretation of the policy

All Representatives must understand and be responsible for abiding by and implementing this Policy. Any violation of this Policy will result in discipline by the Company. If any Representative misuses the Personal Information of another Representative or third party, it will be considered a serious offence for which appropriate disciplinary action may be taken, up to and including termination of employment or service agreement, or court action. Any interpretation associated with this Policy will be made by the Compliance Officer, in conjunction with legal counsel. This Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word "including" is used, it shall mean "including without limitation".

If a Representative or third party has a question about the following:

- (a) access to Personal Information;
- (b) the collection, use, management or disclosure of Personal Information;

- (c) changing or withdrawing consent with respect to Personal Information; or
- (d) obtaining more information about this Policy or relevant legislation;

Please contact the Compliance Officer via the information provided in the Company's Whistleblower Policy.

The Company endeavours to answer all questions raised in a timely manner and advise Representatives in writing of any steps taken to address an issue brought forward. If a Representative or third party is not satisfied with the Company's response, that Representative may be entitled to make a written submission to the privacy authority applicable for their jurisdiction.

Approved by the Advisory Board of Directors, December 2019. Effective January 2020.