# ELECTRONIC MONITORING POLICY BARRHAVEN RESTAURANTS LIMITED (BRL)

**Policy Statement**

**BARRHAVEN RESTAURANTS LIMTED (McDonald’s)** from time to time electronically monitors its Personnel (“**Personnel**” includes employees and contractors of **BRL**). The purpose of this policy is to provide transparency related to such monitoring.

Barrhaven Restaurants will only collect and use Personal Information (in accordance with and as defined in the applicable McDonald’s Privacy Policy) for objectively reasonable purposes and will apply the following guiding principles:

* To maintain the privacy and dignity of all Personnel;
* Grant limited access only to those required to affect the objectively reasonable purpose;
* Limit the amount of Personal Information being collected to only what is reasonably required to achieve the purpose;
* Leverage technology and methods to minimize unnecessary access, collection and use of Personal Information to the extent possible; and
* Consider less privacy-intrusive alternatives.

# Policy

Barrhaven Restaurants Limited may, in circumstances that it deems appropriate, electronically monitor Personnel by accessing electronic programs, software, systems, communication technology, equipment, and/or devices that are owned, maintained, provided by, and/or used by **BRL** or its Personnel (collectively “**Electronic Systems**”). Personnel should have no reasonable expectation of privacy with respect to their use of the Company’s Electronic Systems.

Electronic Systems that **BRL** may use to monitor Personnel include but are not limited to the following:

|  |  |  |  |
| --- | --- | --- | --- |
| **Monitoring Description** | **Circumstances** | **How Monitoring Occurs** | **Purpose** |
| Video  surveillance | Continuous | Interior and exterior of restaurant premises, including drive-thru, are subject to video surveillance. | Personnel safety and security,  Personnel  management, physical security of workplace premises |
| Social media | Continuous | Barrhaven Restaurants may monitor social media posts to ensure compliance with social media policies and  employment obligations. | Personnel  management. |

|  |  |  |  |
| --- | --- | --- | --- |
| Equipment use | Continuous | Barrhaven Restaurants uses automated  software and manual processes to  monitor employee use of equipment, including, for example, cash registers, scanning devices, point of sale, and other business equipment. | Business  continuity and Personnel  management. |
| Corporate  owned device and network management | Continuous | Barrhaven Restaurants uses automated  software and/or manual processes to monitor any activity or content  stored on, or accessed through, corporate owned devices and  networks. This includes monitoring:  (1) corporate network traffic (including any activity on a personally owned device using the corporate network); and (2) browser or app- usage history, photographs, videos, and other files or data stored on or accessed through Company  computers, laptops, mobile phones, tablets, and other devices.  This monitoring may include the use of automated endpoint detection and response, data loss prevention, and performance management software tools that record programs run, time per program, files read and written, screen captures/activity, keystrokes, and data exfiltration or deletion. The Company may also monitor location information of such Company owned devices, and remotely access and delete data on such devices, if deemed necessary to do so. | Business continuity purposes,  Personnel  management, and network security. |
| Corporate email, telephone,  messaging, and scheduling  systems (including third party tools) | Continuous | Barrhaven Restaurants uses automated  software and/or manual processes to monitor any activity on, or content stored on or accessed through  corporate email, telephone, scheduling, and messaging systems or applications (e.g., WebEx, Microsoft Teams, Workplace, etc.), and third- party tools (e.g. Achievers, etc.), including Company-use web-based | Business continuity purposes,  Personnel  management, and network security. |

|  |  |  |  |
| --- | --- | --- | --- |
|  |  | platforms and applications accessed through non-Company owned  devices. |  |

Barrhaven Restaurants may, depending on the circumstances, engage in monitoring at any time, whether during or outside of regular business hours for uses covered by this Policy. In addition to the purposes specified above, the Company may use the information obtained through such monitoring for one or more of the following purposes: business operations; business administration; compliance; safety; security; workplace investigations; productivity; and performance management.

The Company may also engage a third party to monitor for circumstances covered by this Policy. Such third party will conduct and/or participate in such monitoring as if it were the Company and adhere to this Policy including the guiding principles outlined above.

# Administration

This policy will be interpreted and applied consistent with the Barrhaven Restuarants obligations under the applicable employment standards legislation and privacy legislation, as amended or replaced (all such legislation referred to as the “**Applicable Law**”). Subject to compliance with Applicable Law, the Company shall have full discretionary authority to interpret and administer this policy. The Company reserves the right to modify, amend, suspend or terminate this policy at any time, in its sole discretion, without advance notice.

This policy was prepared as of **October 11, 2022. Questions and Contact Information**

If you have any questions about this Electronic Monitoring Policy or the ways in which the Barrhaven Restaurants Limited collects, uses or processes your Personal Information please contact Kate ([kate.murphy@post.mcdonalds.ca](mailto:kate.murphy@post.mcdonalds.ca) or Marc [marc.st-pierre@barrhavenmcd.com](mailto:marc.st-pierre@barrhavenmcd.com).

|  |  |  |  |
| --- | --- | --- | --- |
| Crew | Print Name: | Signature: | Date: |
| Manager | Print Name: | Signature: | Date: |