

Privacy Policy

Owner: Privacy Officer

Effective date: November 30, 2009

Last updated: March 25, 2021

Last reviewed: March 25, 2021

Overview

Cenovus is committed to protecting the privacy of Personal Information that we collect or that is provided to us for the purpose of conducting our business.

Purpose

This Policy explains the Personal Information that Cenovus collects from or about you, how we use and to whom we disclose that information, and how individuals may inquire about or access their Personal Information in Cenovus's custody or control.

Scope

This Policy applies to all Personal Information that we collect in the course of our business activities, unless the Personal Information is related to an individual who seeks to be, is or was employed by Cenovus. Such information is dealt with in Cenovus's Employee Privacy Standard.

Cenovus complies with privacy legislation within each jurisdiction in which the Company operates. Privacy legislation and/or an individual's right to privacy differ from one jurisdiction to another. This Policy applies to Cenovus's activities that are governed by the privacy legislation applicable to its operations in Canada and the United States. In all other jurisdictions, Cenovus complies with the provisions of the applicable statutes and regulations and may develop a policy or standard where appropriate.

Personal Information

Definition

Personal Information means information about an identifiable individual.

It does not include the name, title, business address, business telephone number, business e-mail, business fax number or other business contact information of a representative of an organization when such information is collected, used or disclosed for the purpose of contacting such individual as a representative of such organization. Personal Information also excludes anonymized or aggregated information that de-identifies Personal Information and cannot be associated with or traced back to an identifiable individual.

Consent

Generally, we obtain your consent prior to collecting, using or disclosing your Personal Information. Depending on the sensitivity of the Personal Information, consent may be express (orally, electronically or in writing), deemed (using an opt-out mechanism) or implied (reasonably inferred from an individual's action or inaction). An example of implied consent is when an individual enters into an agreement with Cenovus and the Company assumes that the individual agrees and consents to the collection, use and disclosure of their Personal Information for those purposes related to the performance of that agreement.

Where required by law or order of a court, administrative agency or other governmental tribunal, Cenovus may collect, use or disclose Personal Information without an individual's consent such as to respond to emergencies, where obtaining consent would be similarly unnecessary or inappropriate, or where the

information is publicly available.

Certain Personal Information is collected, used, retained and disclosed by Cenovus in the course of its relationship with an individual. Withdrawal of consent may affect certain aspects of that relationship, including eligibility for certain benefits, goods and services provided by Cenovus or third parties used by Cenovus. Withdrawal of your consent must be in writing and addressed to the Privacy Officer at privacy@cenovus.com.

Collection

We collect your Personal Information for reasonable purposes, including managing our relationship with you in the course of conducting our business, which may include the following:

- Information such as your name, home address, telephone number and personal email address to allow us to contact or identify you to meet business, legal or regulatory requirements.
- Financial information such as bank accounts, tax related information, occupation, payment terms and amounts, and information required to facilitate payment and meet contractual obligations.
- Property information such as title, ownership, road use and access information, to allow us to conduct exploration, development and operations activities.
- Environment, health and safety information, including health information and dependent information, to allow us to communicate effectively with you in an emergency situation.
- Information for license and permit applications that is required in order to participate in regulatory processes or as otherwise required by law.
- Information for processing of applications for technology development or community-based programs.
- Information related to the provision of products and services.
- Surveillance data to allow us to protect staff, as well as to protect against theft, vandalism and damage to goods and property.
- Information in order to meet other business, legal and regulatory requirements.

We limit the Personal Information we collect to only that which is necessary for the purposes for which it was collected. If we wish to use your Personal Information for any other purpose, where required by applicable law, we will obtain your consent before using the information.

Use and disclosure

We generally use and disclose your Personal Information for the following purposes:

- Managing and administering contracts (including leases).
- Conducting geophysical operations.
- Constructing roads, wellsites, pipelines and facilities.
- Environmental and reclamation activities.
- Drilling and completions activities.
- Acquisition and divestiture activities.
- Complying with regulatory requirements and Cenovus policies, including health, safety and environmental rules, regulations and policies.
- Managing and administering retail programs and services, including customer rewards programs.
- Administering scholarships and community-based programs.

We also collect, use and disclose Personal Information to communicate with you, to facilitate participation in Cenovus events and to enable us to provide information about Cenovus to you.

Personal Information may be transferred or disclosed by and between Cenovus affiliates in the course of their business activities.

We may share your Personal Information with our employees, contractors, consultants and other parties who require such information to assist us with managing our relationship with you, and to fulfill the purposes listed above. Further, Personal Information may be subject to transfer to another jurisdiction for processing and storage by a third party performing service for Cenovus, including Canada, the United States, the United Kingdom, the European Union including but not limited to Ireland, Germany, and the Netherlands, Australia, Argentina and India. In such situations, the Personal Information may be accessible by courts, law enforcement and national security authorities of that jurisdiction. In addition, Cenovus may use certain cloud-based services to process or store information.

Sharing of Personal Information with third party service providers is governed by contractual agreements which include appropriate privacy and security safeguards. Such contractual agreements require that any third party with whom we share your Personal Information must use the information solely for the purposes of providing the contracted services for Cenovus, and that the third parties agree to handle Personal Information in a manner consistent with the relevant principles in this Policy and/or applicable laws.

Your Personal Information may be also disclosed or transferred to a third party in the event of a change of ownership of all or part of Cenovus, in which case we will ensure that such party is bound by appropriate agreements or obligations and is required to use or disclose your Personal Information in a manner consistent with the use and disclosure provisions of this Policy and/or applicable laws.

Security

Cenovus takes reasonable precautions designed to protect Personal Information in our possession from loss, misuse and unauthorized access, disclosure, alteration, and destruction. We maintain physical, procedural and technical safeguards that are appropriate to the sensitivity of the Personal Information. Cenovus also restricts access to Personal Information to only those individuals that it determines need to know that information in order for Cenovus to carry on its business.

As the security of the Personal Information in Cenovus's custody and control is important, please advise the Company's Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of any Personal Information that is in Cenovus's custody or control.

Accuracy

Cenovus endeavors to ensure that any Personal Information in its possession is as accurate, current and complete as necessary for the purposes for which Cenovus uses that data. Cenovus asks that if an individual's Personal Information happens to change during the course of the relationship, they keep the Company informed of such changes. If an individual believes the Personal Information that Cenovus holds about them is incorrect, inaccurate or requires an update, that individual may submit a request in writing to the Privacy Officer. Requests for changes to Personal Information will be handled in accordance with applicable privacy legislation.

Retention and access

Personal Information is only retained for the period of time necessary to fulfill the purpose for which it was collected, or as otherwise required by statutory or other legal purposes. Retention and destruction of Personal Information is in accordance with our records management practices and applicable laws.

Cenovus permits the reasonable right of access and review of your Personal Information held by the Company unless the release of such information may be withheld as permitted or required by law. When requesting access to your Personal Information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the Personal Information that we hold about you. Upon written request to the Privacy Officer, provided that sufficient detail is provided, Cenovus will provide that individual with access to their requested Personal Information

subject to applicable privacy legislation. Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure.

Where your Personal Information will be disclosed, Cenovus will endeavor to provide the information in question within a reasonable time period consistent with applicable laws. The applicable time period will begin from the date that Cenovus receives all of the information required to reasonably respond to the request from the individual making the request.

Cenovus reserves the right to charge a reasonable fee for the purpose of responding to a request for Personal Information.

Monitoring and surveillance

Monitoring of Cenovus property, including assets and premises, is done on an “as required” basis in proportion to the risks that Cenovus faces.

In the course of conducting its business, Cenovus may monitor the activities of individuals in respect of its operations and its property to ensure the efficient use of its systems and equipment, to protect Cenovus staff and property and to ensure compliance with applicable laws and Cenovus policies. Accordingly, individuals using Cenovus property or accessing Cenovus premises should not have any expectation of privacy with respect to their use of Cenovus property or resources.

For example, some Cenovus locations are equipped with security cameras. These cameras are generally in high risk areas. Where in use, security cameras are there for the protection of employees and third parties, and to protect against theft, vandalism and damage to Cenovus goods and property. Recorded images are routinely destroyed and not shared with third parties unless there is suspicion of crime, in which case they may be turned over to the police or other appropriate government agency or authority.

We may also monitor and record certain telephone calls. Generally, where telephone calls are routinely monitored, you will be informed that the conversation is being recorded at the beginning of the call and the purposes of the monitoring or recording either by an automated recording or by a Cenovus customer service representative.

Changes

We may amend this Policy from time to time. If we make any material changes in the way we collect or use your Personal Information, we will post a notice on the Cenovus website and, where required by applicable law, afford you the opportunity to consent to any new use or disclosure. We encourage you to check the www.cenovus.com periodically for any such postings.

Contact us

Any violation of this Policy and any privacy breaches should be promptly reported to the Privacy Officer.

If you have any questions or concerns with respect to the information provided in this Policy, please contact Cenovus’s Privacy Officer at privacy@cenovus.com. Alternatively, you may contact Cenovus’s Integrity Helpline online or by telephone at 1-877-760-6766.

In this document, "Cenovus", “Company”, "we", "our" and "us" refer to Cenovus Energy Inc. and its subsidiaries and affiliated entities.

Related policies and standards

- Employee Privacy Standard