

Privacy Policy

Owner: Privacy Officer

Effective date: November 30, 2009

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Overview

This Privacy Policy (Policy) sets out the principles Cenovus follows regarding the personal data we collect from or about you, or that is provided to us, for conducting our business operations. It describes the types of personal data that we collect, use and disclose, how we use and protect that data, to whom we disclose personal data, and how individuals may inquire about or access their personal data in Cenovus's custody or control.

Please read the Policy in its entirety before accessing our websites or before disclosing personal data to Cenovus. In this document, "Cenovus", "Company", "we", "our" and "us" refers to Cenovus Energy Inc., its subsidiaries and affiliated entities.

Scope

This Policy applies to personal data collected from:

- Our main website (www.cenovus.com), and all other websites owned and operated by Cenovus that direct the viewer or user to this Policy.
- Third party service providers that we engage with in the course of our operations.
- You directly when you engage with us or when we engage with you for business purposes.

This Policy applies to Cenovus's activities applicable to its operations in Canada and the United States. In all other jurisdictions that it operates in, Cenovus complies with the provisions of the applicable privacy legislation and may develop policies or notices where appropriate.

Cenovus encourages you to read, in addition to this Policy, any country specific privacy notices for further information on our personal data protection practices.

Policy statements

What personal data we collect and how we process it

Cenovus collects personal data about you to offer and/or provide our products and services to you, and to support our business functions. We collect only the information we need to fulfill the purpose for which it is collected.

In certain instances where required by law or order of a court, administrative agency or other governmental tribunal, Cenovus may collect, use or disclose your personal data without your consent, such as to respond to emergencies, or where obtaining consent is not practical.

The type of personal data processed varies based on how you interact with us and falls into three main categories: information you voluntarily provide us, information we collect from you, and information we collect from other sources. The table below shows the types of personal data we collect, how and why we collect it, and with whom we share it.

Categories of personal data	Purpose(s) of processing personal data	Legal basis for data processing	Categories of sources	Categories of third parties with whom personal data is shared, if applicable
Contact information (i.e. home address, email address, telephone numbers etc.), content of requests and other personal data you may provide us when you communicate with us.	To contact and/or identify you to provide you with a service, administer requests to provide the product/ services you request, to communicate with you regarding products/services, to communicate with you for business purposes, including careers at Cenovus and/or for other legitimate business purposes.	Consent and/or fulfillment of contractual obligations.	Collected directly from you or from third parties that assist with our business operations.	Third parties provide us with support services.
Financial information, bank accounts, tax related information, payment terms and amounts, and other information.	To facilitate payment and process financial transactions.	To conclude, execute, perform and administer contracts with you.	Collected directly from you.	Third parties that provide us with support services.
Environment, health and safety information, including health information and dependent information.	To communicate effectively with you as needed in the circumstances.	To protect the interests of the affected individuals and to fulfill legal obligations.	Collected directly from you.	Third parties that provide us with support services.
Information for license and permit applications.	To participate in regulatory processes or as otherwise required by law.	To fulfill legal obligations.	Collected directly from you.	Third parties that provide us with support services.

Categories of personal data	Purpose(s) of processing personal data	Legal basis for data processing	Categories of sources	Categories of third parties with whom personal data is shared, if applicable
Information for processing of applications for technology development or community-based programs.	To process applications for programs and for program execution.	Consent, fulfilling contractual obligations and/or legitimate business interest.	Collected directly from you.	Third parties that provide us with support services.
Surveillance data at our business locations. While conducting its business, Cenovus may monitor the activities of individuals in respect of its operations and its property.	To protect staff, as well as to protect Cenovus against theft, vandalism and damage to goods and property, and to ensure compliance with applicable laws and Cenovus policies.	Legitimate business interest to protect staff and property. 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.	Collected automatically. Monitoring of Cenovus property, including assets and premises, is done on an “as required” basis.	Third parties that provide us with support services.
Information to administer our MyHusky Rewards program, such as contact information, your interests and preferences, etc.	To administer the MyHusky Rewards program and to provide you with customized services.	Consent, fulfilling contractual obligations and/or legitimate business interest.	Collected directly from you and in some case automatically.	Third parties that provide us with support services.
Information collected electronically when you interact with our websites, email, social media accounts, online advertising, or using our or a commissioned third party’s technologies, which include cookies, IP addresses, domain type, browser	To understand how you interact with us through these forums to gain insight into serving you better.	Legitimate business interest to ensure the relevance of services and to improve the functionality of the websites.	Collected automatically through Google Analytics and Matomo.	Companies hired to report web analytics and other third parties that provide us with support services.

Categories of personal data	Purpose(s) of processing personal data	Legal basis for data processing	Categories of sources	Categories of third parties with whom personal data is shared, if applicable
type, web beacons, single pixel gifs and other technologies such as data management platforms.				
Voice recording from telephone calls.	To improve business processes and customer service and to respond to emergency calls.	Consent and legitimate business interest.	Directly from you.	Third parties that provide us with support services.
Any personal data referred to in this Policy, provided the personal data is pseudonymized or anonymized as required under applicable law.	For analytics and statistical purposes.	Legitimate business interest to ensure the relevance of services and to improve the functionality of the tools and systems.	Collected directly from you, and/or automatically.	Third parties that provide us with support services.

If we wish to use your personal data for any other purpose, where required by applicable law, we will obtain your consent before using the information.

How we secure your personal data

Cenovus takes reasonable precautions to safeguard your personal data from loss, misuse and unauthorized access, disclosure, alteration and destruction. To protect your personal data, we use appropriate organizational, administrative and technical security measures appropriate to its sensitivity.

When Cenovus shares or discloses your personal data to third party service providers, or in the case of a business transaction or during a change of ownership of all or part of Cenovus, the transactions are governed by contractual agreements. These agreements require third parties to have similar standards of appropriate privacy and security safeguards, to use the information solely for the purposes for which it was shared or disclosed, and to handle personal data in a manner consistent with the principles in this Policy and/or applicable laws.

Transfers of personal data

In cases where personal data is shared or disclosed, that information may be transferred to another jurisdiction for processing. These jurisdictions include Canada, the United States, the United Kingdom, Australia, Argentina, India and the European Union, including but not limited to Ireland, Germany, and the Netherlands. Personal data transferred may be accessible by courts, law enforcement and national security authorities of those jurisdictions. Cenovus takes steps to protect your personal data when transferred.

Retention and disposal of your personal data

Personal data is retained for different time periods depending on the category of personal data and the purpose for which it was collected. Some information may be deleted based on specific schedules, such as a Workday account created for applying for a job with Cenovus. Other information, such as personal data shared as part of a contractual agreement, may be retained for a longer period based on the terms of the agreement. Finally, we may further retain information for other legal purposes, such as fraud prevention, recordkeeping or enforcing our legal rights.

Please note that if your personal data is collected by a third party, it will be retained in accordance with the privacy policies and records retention requirements of that third party, subject to our agreement with them for retention and disposal of the personal data shared for the engagement.

Your rights

Right to withdraw consent

In cases where you have provided your consent to collect and process your personal data, you may withdraw your consent at any time, subject to contractual or legal restrictions. In some cases where you have withdrawn your consent, it may affect certain aspects of that relationship, such as providing you with products or services.

Right to access, correction and deletion

We endeavor to ensure that any personal data in our custody or control is as accurate as possible for the purposes for which it was collected. We rely on you to maintain the accuracy and completeness of your personal data. If your personal data changes during your relationship with us, please keep us informed of such changes.

If your personal data was shared with us, you can request:

- Access to your personal data.
- Correction or deletion of your personal data (where the data is no longer required to fulfill a legal obligation).
- That you no longer receive communications from us.
- That the processing of your personal data is restricted.
- That you receive a copy of the personal data in our custody and control.

In some cases, you may be able to withdraw consent yourself, such as unsubscribing from emails. However, in most cases a written request is required to be sent to Cenovus's Privacy Officer at privacy@cenovus.com.

When requesting access to your personal data, 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 data that we hold about you.

Reasonable access to your personal data will be provided at no cost. However, Cenovus reserves the right to charge a reasonable fee for a personal data access request, depending on the nature of the request. If access to your personal data cannot be provided within a reasonable time frame, Cenovus will provide you with a date when the information will be provided. If for some reason access is denied, Cenovus will provide an explanation as to why access has been denied.

Updates to this Policy

We may amend this Policy from time to time. If we make any material changes in the way we collect or use your personal data, 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 our main website www.cenovus.com periodically for any such postings.

Contact us

If you have any questions about the information provided in this Policy, please contact Cenovus's Privacy Officer at privacy@cenovus.com.

Cenovus maintains procedures for addressing and responding to all inquiries from individuals about Cenovus's processing of personal data, and review, and where appropriate investigate privacy-related concerns. Cenovus will take appropriate measures to resolve complaints brought to its attention.

Glossary

Personal data - personal data, also known as personally identifiable information or personal information, is any information related to an identifiable individual. Broadly, the term refers to information that can be used to identify, locate, or contact an individual, alone or when combined with other personal or identifying information. Examples of personal data include information that is linked or linkable to an individual, such as educational, financial, and employment information, employee identification number, email address, home address, driver's license number, photographic image, or other unique biometric data.

Processing - processing refers to any activity performed on personal data whether or not by automated means, including collection, use, storage, transfer and through to the destruction of personal data.