



As of May 12, 2008

This Privacy Policy applies to the operations of Talisman Energy Inc. in Canada (Talisman) and is to be read in conjunction with the ten Fair Information Principles contained in the Talisman Canadian Privacy Statement. This policy applies to all personal information collected, used or disclosed by Talisman, except information in the public domain.

This policy is intended to communicate both internally and externally, Talisman's overall strategy and approach to ensure compliance with privacy laws. This policy, together with Talisman's privacy practices and procedures provide guidance to all Talisman employees, managers and contractors and a clear understanding of their obligation to support Talisman's commitment to privacy compliance.

### **Definitions**

**Business Contact Info:** Name, business address, business telephone number and business email address

**Collection:** To gather, acquire, obtain or record personal information from any source, including third parties

**Consent:** Voluntary agreement to the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied:

- Express consent is given explicitly, either verbally or in writing.
- Implied consent arises where consent can be reasonably inferred from the action or inaction of the subject individual, or where legislation or regulation have historically mandated collection.

**Disclosure:** Making personal information available to a third party.

**Employee:** An individual employed by an organization and includes an individual who performs a service for or in relation to or in connection with an organization; as an apprentice, volunteer, participant or student or under a contract or an agency relationship with the organization.

**Personal Information:** Information including opinions and evaluations recorded in any form, about an identified individual, or an individual whose identity may be reasonably determined from the information excluding business contact information. Personal information includes information such as name, age, marital status, home or mailing address, personal telephone numbers, SIN, bank account numbers, other ID numbers, income, employment history and financial history.

Some personal information such as religious beliefs, medical conditions, racial or ethnic origin and sexual preferences is considered sensitive and warrants more stringent safeguards.

Record: Information in any form or in any medium whether in written, printed, photographic or electronic form or any other form, not including a computer program or other mechanism that can produce a record.

Third Party: Any individual or organization outside Talisman.

Use: Treatment, handling, and management of personal information by and within Talisman.

## **POLICY**

### **1. Accountability**

Talisman's Privacy Coordinator serves as the primary contact for privacy issues related to Talisman's operations and reports directly to the Executive Vice-President, Corporate Services on privacy matters. All managers and supervisors are expected to become familiar with and support and oversee privacy compliance.

The Privacy Coordinator and other individuals within Talisman may be delegated to act on direction from management or take responsibility for the day-to-day collection and processing of personal information. Michael Van Hee is Talisman's Privacy Coordinator. When required, other Talisman individuals may be appointed by senior management to act in the place of the Privacy Coordinator.

Talisman is responsible for information in its possession or control including information that has been transferred to a third party for processing. All persons and organizations collecting information on Talisman's behalf are expected to adhere to privacy principles and Talisman's Privacy Policy.

### **2. Identifying Purposes**

Unless it is obvious, Talisman identifies the purposes for which personal information is collected and specifies verbally, electronically or in writing, the identified purposes at or before the time the personal information is collected.

When personal information is collected for purposes not previously identified, the new purposes are communicated prior to use. Unless the new purposes are required or authorized by law, consent is obtained before the information is used for the new purpose.

#### **2.1 External Stakeholder Information**

Talisman collects personal information about individuals including landowners, leaseholders, residents and royalty holders. The collection of personal information is for legitimate business purposes such as:

- Administration – to execute agreements, facilitate payments and file land registry requirements;
- Safety – Emergency Response Plans;
- Legal Compliance – as required by law or regulation (for example EUB, environmental and government regulations);
- Development – to manage and foster relationships necessary to conduct business;
- External stakeholder considerations reasonably necessary and/or required.

## **2.2 Other Information**

Talisman may collect personal information about individuals not falling within the above two categories, and such collection, use or disclosure will be subject to this policy. For example, a shareholder may contact Talisman and seek information. Their name and contact information would be retained as necessary to respond to the request.

## **3. Consent**

Talisman uses reasonable efforts to ensure that individuals understand how their personal information will be used. Talisman will obtain consent as required for the collection, use and disclosure of personal information, except where inappropriate. Talisman will obtain consent for the collection, use or disclosure of information through written, verbal or electronic means or other appropriate processes.

Talisman generally seeks to obtain consent at the same time personal information is collected. Talisman may, however, seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.

### **3.1 Consent Not Required**

In certain circumstances, Talisman may collect and use personal information without the knowledge or consent of the individual. For example:

- It is clearly in the interests of the individual and consent cannot be obtained in a timely manner (e.g. when the individual is seriously ill).
- Obtaining prior consent would defeat the purpose of collecting the information (e.g. in the investigation of a breach of an agreement or policy, or a contravention of law).
- In the case of an emergency where the life, health or security of the individual is threatened.
- When determining the form of consent, Talisman considers the sensitivity of the information and the reasonable expectation of the individual. For example, Talisman will obtain express consent when the information is considered to be sensitive; implied consent may be appropriate when information is less sensitive.

### **3.2 Previously Collected Information**

Prior to privacy legislation, personal information was collected and used for reasonable and legitimate business purposes. The information previously collected shall not be used or disclosed for purposes other than those for which it was originally collected. If

Talisman has intentions to use this information for new purposes, Talisman will endeavour to ensure consent is obtained from these individuals.

Talisman will provide education and training to enable employees to understand how Talisman uses and discloses personal information on a go-forward basis. Contact the Talisman Privacy Coordinator for further information.

### **3.3 Withdrawal of Consent**

Consent may be withdrawn at any time, subject to legal or contractual restrictions and reasonable notice. Talisman informs individuals of the implications for withdrawing consent. Contact the Talisman Privacy Coordinator for more information regarding the implications of withdrawing consent.

## **4. Collection**

Talisman limits the amount and type of personal information collected to that which is necessary for the identified purpose.

### **4.1 External Stakeholder Information**

Examples of the types of information collected from landowners, leaseholders, residents, royalty holders and others are:

- Name and contact information plus additional information as required (e.g. information required for emergency response procedures);
- Banking information to make payments directly to bank accounts;
- Leaseholder preferences as appropriate.

### **4.2 Protection of Talisman Property and Facilities**

In the course of conducting business, Talisman may monitor the access to and use of its property and facilities including premises, computers, telephones, office and communications equipment, as well as software applications including email and Internet. Individuals may use these resources with the understanding that it is considered the property of Talisman and usage may be reviewed by Talisman if it is considered necessary to protect its business interests.

Talisman may monitor its resources to limit damage or inappropriate or illegal use of those resources through such means as:

- reporting on usage of security access cards,
- video surveillance in its offices and some work sites,
- monitoring of Internet and email usage.
- Talisman does not monitor voice mail or incoming telephone calls. Outgoing telephone calls are logged for long distance charge costing.

This is not meant to suggest that individuals are subject to constant surveillance. It is meant to bring to attention the fact that such monitoring may occur and may result in the collection of personal information from individuals using Talisman's resources. When using Talisman equipment or resources, individuals should not have any expectation of privacy with respect to their use of such equipment or 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 in proportion to the risks that Talisman faces. In some instances, Talisman may supplement this monitoring notice with more specific ones as appropriate (e.g. video surveillance).

## **5. Limiting Use, Disclosure and Retention**

Talisman will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or authorized by law.

### **5.1 Common Disclosure**

Where required by law, lawful contractual obligations, court order, or competent authority, or for the purposes of a merger, consolidation, or sale of Talisman's assets,

Where the information is public.

### **5.2 Limiting Use and Disclosure**

Where obliged or permitted to disclose information without consent, Talisman will disclose only the information that is required.

Only Talisman employees and contractors with a business reason or whose duties so require are granted access to personal information. Our policies strike a balance between trusting the professionalism of our employees and the need to comply with the law.

### **5.3 Retention**

Talisman will retain personal information only as long as it is necessary for the identified purpose, or as required by law.

Personal information that is no longer required to fulfil the identified purposes or required by law to be retained is destroyed by confidential means (e.g. shredding, erasure, made anonymous).

## **6. Accuracy**

Talisman endeavours to ensure that any personal information in its possession is as accurate, current and complete as necessary for the intended purpose.

## **7. Safeguards**

Talisman endeavours to protect personal information against such risks as loss, theft, unauthorized access, disclosure, copying, use, modification or destruction,

Talisman has developed and implemented security policies and procedures to protect personal information as appropriate to the sensitivity of the information. These methods include:

- physical measures (e.g. locked filing cabinets and desks, restricted access to floors and offices);
- organizational measures (e.g. security clearance, access by authorized individuals only);
- technological measures (e.g. passwords and encryption).

Talisman will use contractual agreements to provide an acceptable level of protection when personal information is disclosed to third parties for processing. Talisman will ensure that all employees are informed of the importance of maintaining the confidentiality of personal information. Talisman provides employees with information about its policies and procedures for protecting personal information and the importance of maintaining the confidentiality of personal information.

Care will be taken in the disposal/destruction of personal information to prevent unauthorized parties from obtaining access to the information.

## **8. Openness**

Talisman will establish procedures to implement the organization's commitment to privacy, including:

- Procedures to protect personal information and to oversee compliance;
- Procedures to receive and respond to complaints and inquiries;
- Communications and education programs to provide information to Talisman's workforce about privacy policies and procedures;
- Publication of Talisman's privacy statement and this policy on Talisman's public web site and availability of hard copy on request by contacting Talisman's Privacy Coordinator.

To make an inquiry or lodge a complaint about Talisman's personal information handling and privacy policies and procedures, contact the Talisman Privacy Coordinator.

## **9. Individual Access**

Talisman upholds the reasonable right of access and review of personal information.

### **9.1 General Access**

A request can be made by completing and submitting a Request for Access to Personal Information form.

To guard against fraudulent requests, Talisman requires sufficient information to confirm the person making the request is authorized to do so. Talisman normally responds to written requests for access to personal information within 45 days or as may be specified in the applicable legislation.

### **9.2 Limitations to Access**

Talisman provides individuals access to their personal information subject to limited and specific exceptions. Talisman may refuse access to personal information if:

- It would reveal personal information about another person.
- Doing so could reasonably be expected to threaten the life or security of another individual.
- The disclosure would reveal confidential commercial information.
- The information is protected by legal privilege.

### **9.3 Correction/Amendment of Personal Information**

Talisman will correct or amend personal information as required when an individual successfully demonstrates the inaccuracy or incompleteness of the information. Amendment may involve the correction, deletion, or addition to any personal information found to be inaccurate or incomplete.

Any unresolved differences as to accuracy or completeness may be appended to an individual's file. Where appropriate, Talisman shall inform any third parties having access to the personal information in question as to any amendments, or the existence of any unresolved differences between the individual and Talisman.

## **10. Challenging Compliance**

Talisman investigates all complaints concerning compliance with its Privacy policies and legislation. A complaint can be made by completing and submitting the Privacy Compliance Complaint Form.

If a complaint is found to be justified, Talisman will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. Individuals shall be informed of the outcome of the investigation regarding their complaint.

### **10.1 Mediation**

In the event of a complaint, and with the consent of the Talisman Privacy Coordinator and the individual making the complaint, mediation of the complaint will be conducted with a view to early and amicable resolution.

For more information or questions about Talisman's privacy statement, policy or procedures, please contact the Talisman Privacy Coordinator by email, telephone at (403) 237-4833 or by mail:

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