

MEG Energy Corp. Privacy Policy

Purpose

As set out in the *Business Conduct Charter*, MEG Energy Corp. ("MEG") respects the privacy of personal information under its control. MEG has therefore implemented this Privacy Policy to describe the manner in which MEG collects, uses, retains and discloses personal information in accordance with applicable privacy laws, as may be amended from time to time (collectively, "Canadian Privacy Law").

Scope

This Privacy Policy governs the collection, use, retention and disclosure of personal information by MEG that relates to individuals who seek to be, are, or were employed or engaged by MEG or who are otherwise associated with MEG. This Privacy Policy is to be read in conjunction with MEG's other policies but does not rescind, replace or otherwise override any specific agreement between an individual and MEG, including any agreement concerning the confidentiality of information.

What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than an individual's business title or business contact information where such information is used or disclosed for the purposes of business communications.

What Personal Information does MEG Collect?

MEG collects and retains different types of personal information in respect of individuals including home addresses and telephone numbers, personal e-mail addresses, dates of birth, employee identification numbers, marital status and any other information necessary for MEG's business purposes or which is voluntarily disclosed to MEG by individuals. Examples of the sources of such personal information include:

- résumés, references and interview notes;
- offers of employment;
- reports, performance reviews, evaluations, certificates and test results;
- photographs and video recordings;
- payroll and benefit records, which may include information relating to: short and long term disability; workers' compensation; salary and benefits; savings and pension plans; medical and dental care; and social insurance numbers;
- policy acknowledgement sign-off forms; and
- e-mails and other electronic applications and communication tools.

How is Personal Information Used by MEG?

Personal information that is collected by MEG is used for MEG's business purposes, including establishing, managing or ending employment relationships with MEG. Examples of such uses include:

- determining eligibility for initial employment, including the verification of references and qualifications;
- recruiting employees and otherwise promoting MEG;
- administering pay and benefits;
- processing employee work-related claims (e.g. workers' compensation, insurance claims, etc.)
- establishing training or development requirements and assessing job performance;
- assessing qualifications for a particular job or task;
- gathering evidence for disciplinary action, or termination;
- establishing a contact point in the event of an emergency;

- compiling directories;
- ensuring the security of MEG information or processes; and
- such other uses as may be required or authorized by law or as may be reasonably required by MEG.

When does MEG Disclose Personal Information?

MEG may share personal information with its employees and third parties who reasonably require such personal information to assist MEG with its business activities, including establishing, managing or ending employment relationships.

Personal information may also be disclosed or transferred to another party in the course of a corporate reorganization, a divestiture or a securitization of all or part of MEG through some form of business transaction, including an asset or share sale, a financing, a merger or a joint venture. In such event, the recipient will be restricted by appropriate agreements or obligations to use or disclose such personal information in a manner that is consistent with the use and disclosure provisions of this Privacy Policy.

How is Personal Information Protected?

MEG endeavours to maintain reasonable physical, procedural and technical safeguards in an effort to prevent any loss, misuse, unauthorized access, disclosure, or modification of an individual's personal information. As part of these precautions, MEG endeavours to restrict access to personal information to only those employees and third parties that MEG determines need to know such information in order for MEG to conduct its business.

How Long is Personal Information Retained?

MEG has a number of legal, accounting and reporting obligations which may require the retention of an individual's personal information. However, MEG endeavours to retain an individual's personal information only for so long as MEG believes is necessary to meet such obligations or to fulfill the purposes for which the information was collected.

Updating Personal Information

MEG endeavours to ensure that any personal information in its possession is as accurate, current and complete as necessary for the purposes for which MEG uses that information. Individuals should advise MEG of changes in their personal information if such changes may affect the accuracy of MEG's records.

To the extent permitted by Canadian Privacy Law, an individual may request that MEG delete or correct an individual's personal information. MEG reserves the right to retain such information for legal or business purposes and for as long as is reasonable in each circumstance. If MEG accepts a request to delete or correct an individual's personal information, the original personal information may nevertheless continue to reside in MEG's systems due to technical constraints and the existence of electronic back-ups.

Accessing Your Personal Information

Subject to the terms of this Privacy Policy and Canadian Privacy Law, upon receipt by the Privacy Officer of a written request, MEG will provide access to the personal information requested within a reasonable time. However, MEG is only able to provide access where the written request contains sufficient detail to enable MEG, with reasonable effort, to identify the information requested. Any individual requiring assistance with the submission of a written request should contact the Privacy Officer.

MEG may also require sufficient information to allow it to confirm that the person making the request is authorized to do so before granting access or making corrections. This may occur, for example, where an authorized representative seeks information about a former or deceased employee or where law enforcement authorities seek information about an employee.

In some cases, MEG may not be able to provide an individual with all the information that MEG may have about them. MEG reserves the right to decline to provide access to personal information where the information requested is of a type of information where denial of access is authorized or required by law.

Policy Revision, Interpretation and Consent

From time to time, MEG may revise this Privacy Policy to reflect changes in its activities and practices or to ensure compliance with Canadian Privacy Law. Any revised version of the Privacy Policy will be electronically posted and to the extent permitted by law, the revised Privacy Policy will take effect at the time that it is posted.

If there is an inconsistency between this Privacy Policy and Canadian Privacy Law, this Privacy Policy shall be interpreted to give effect to and comply with such Canadian Privacy Law but this Privacy Policy shall not impose upon MEG any obligations beyond those conferred by Canadian Privacy Law. Any disputes relating to the interpretation of this Privacy Policy will be resolved by the Privacy Officer.

In some circumstances, MEG is required to obtain consent to the collection, use, retention or disclosure of an individual's personal information. Unless an individual advises MEG otherwise, by receiving access to this Privacy Policy, an individual will be deemed to have given consent to the collection, use, retention and disclosure of all such personal information for the purposes set out in this Privacy Policy and for the purposes stated or reasonably implied at the time such information was provided to MEG. Where consent is required, an individual may withdraw his or her consent at any time, subject to legal or contractual restrictions and reasonable notice. MEG will endeavour to advise such individual of the implications resulting from a withdrawal of consent. In some circumstances a withdrawal of consent may severely limit MEG's ability to process benefits or provide products or services to an employee, and may otherwise affect MEG's relationship with the individual.

Privacy Officer

MEG's Privacy Officer is responsible for overseeing all aspects of this Privacy Policy along with any other issues relating to MEG's privacy policies and practices. The Privacy Officer may be contacted via e-mail at **MEGPrivacy@megenergy.com**, or via mail or courier at:

Privacy Officer
MEG Energy Corp.
21st Floor, 600-3rd Avenue SW
Calgary, Alberta
T2P 0G5

Questions about this Privacy Policy

Questions or concerns about this Privacy Policy or any of MEG's privacy practices should be forwarded in writing to the Privacy Officer. The Privacy Officer will then endeavour to address such questions or concerns, report back to the individual and advise of any steps taken to address the issues raised.