

Privacy Policy

Owner: Privacy Officer

Effective date: November 30, 2009

Last updated: October 10, 2019

Last reviewed: October 10, 2019

Overview

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

Purpose

The purpose of this Policy is to inform you of our practices concerning the collection, use and disclosure of your Personal Information that we obtain in the course of your relationship with us. This Policy explains how we collect, use and disclose your Personal Information, the choices you have regarding such collection, use and disclosure, and how you may correct and/or access that information. We will treat Personal Information in a manner that is consistent with the terms outlined in this Policy.

Scope

This Policy applies to the Personal Information collected from and about identifiable individuals impacted by our business activities or individuals who request information about our company ("external individuals"). This includes individuals who live on or near, or who have access to or use lands where Cenovus operates. It also includes our investors, potential investors, and those third parties participating in Cenovus events or providing services to Cenovus.

This Policy governs unless the Personal Information:

- Is related to an individual in their capacity as a prospective, present or former employee of Cenovus, in which case the Personal Information shall be in accordance with the principles and requirements of the "Employee Privacy Standard"

From time to time, we may make changes to this Policy. This Policy is current as of the "last updated" date appearing at the top of this page.

Personal Information

Definition

Personal Information means information about an identifiable individual. Specifically, it includes information that directly identifies you, but also includes information which is linked to you (e.g. your date of birth, telephone number, and all personal information linked to your name). Business title and business contact information when used or disclosed for the purpose of business communications is excluded from this definition.

Consent

Generally, we obtain your consent prior to collecting, using or disclosing your personal information for any reasonable purpose. You may provide your express consent to us either orally, electronically or in writing. You may also consent to our collection, use and disclosure

of your personal information by voluntarily providing us with your personal information through a clear, affirmative action (e.g. submitting an access to information request).

Cenovus may also rely on your implied consent to the collection, use and disclosure of your personal information where implied consent is permitted by law. Unless otherwise permitted by law, no personal information is collected, used or disclosed about an individual without first obtaining the individual's consent to that collection, use or disclosure. Notwithstanding the foregoing, Cenovus may collect, use or disclose personal information without the individual's consent where permitted by applicable law, such as to respond to emergencies or where obtaining consent would be similarly unnecessary or inappropriate.

You may withdraw or vary your consent to our collection, use and disclosure of your personal information on reasonable notice, subject to applicable legal, contractual or regulatory requirements. All communications with respect to the withdrawal or variation of consent should 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 and may include the following:

- Information to contact or identify you such as your name, home address, telephone number, personal email address, marital status, age and date of birth
- 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 to allow us to communicate effectively with you in an emergency situation such as health information and dependent information
- Information for license and permit applications that is required in order to participate in regulatory processes or as otherwise required by law

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, 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
- reclamation activities
- drilling and completions activities
- acquisition and divestiture activities
- complying with regulatory requirements, including health, safety and environmental rules and regulations

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.

Cenovus uses third-party service providers in the course of conducting its business and to fulfill the purposes listed above. Cenovus may disclose Personal Information to third parties that perform services for Cenovus or on its behalf. Further, Personal Information may be subject to transfer to another jurisdiction outside of Canada for processing and storage by a third-party performing service for Cenovus, including the United States and the European Union. In such situations, the Personal Information may be accessible by courts, law enforcement and national security authorities of that jurisdiction.

Transfers of Personal Information to third-party service providers are 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 the event of a change of ownership of all or part of Cenovus, in which case we will endeavor to 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 security with respect to our offices and information storage facilities to prevent any loss, misuse, unauthorized access, disclosure, or modification of your Personal Information. Cenovus restricts access to personal information to only those individuals that it determines need to know that information as part of their job duties.

In terms of communicating Personal Information to Cenovus, there is no method of transmitting or storing data that is completely secure. While the physical characteristics of each are different, mail, telephone calls and electronic transmission are all susceptible to possible loss, misrouting, interception and misuse of the information being communicated or transmitted.

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.

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.

Cenovus permits the reasonable right of access and review of Personal Information about an individual held by the company upon written request to the Privacy Officer, as noted below. 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 the Privacy Officer.

Cenovus reserves the right to decline to provide access to Personal Information where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the requested personal information. Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure.

Where Personal Information will be disclosed to an individual, Cenovus will endeavor to provide the information in question within a reasonable time period, which is typically no later than 45 days from the day that Cenovus receives your written request and subject to certain time extensions, as permitted by law. The applicable time period will begin from the date that Cenovus receives all of the information required to 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

Monitoring of Cenovus property, including assets and premises, will be done on an "as required" basis and will be 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 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. Generally, 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.

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 or send you an email or letter 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

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.

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