



CUSTOMER INFORMATION PROTECTION POLICY

Approved by: President & CEO

Effective: July 27, 2020

1.0 Objective

Canadian Pacific Railway Limited (“CPRL”) and Canadian Pacific Railway Company (“CPRC”) and their subsidiaries (collectively, “CP”) respect CP’s customers’ rights to privacy and confidentiality. CP recognizes that in the course of conducting its business with customers, CP will be provided with certain Personal Information, as that term is defined in the Canada's *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) (“Personal Information”), as well as other confidential commercial information (“Commercial Information”) (Personal Information and Commercial Information are collectively referred to as “Confidential Information.”)

This Customer Information Protection Policy (the “Policy”) establishes a company-wide standard intended to support CP’s commitment to protect customer’s Confidential Information and to ensure compliance with applicable regulatory requirements. This Policy outlines the collection, storing and handling of Confidential Information, including specifically the collection, use, and disclosure of Personal Information collected through CP’s interactions with customers. The Policy supports responsible and secure management of data storage and privacy across CP’s network and operations by assuring a robust management system is in place in accordance with CP’s Information Security Policy.

2.0 Policy Statement

CP’s dedication to privacy and confidentiality is rooted in our deep respect for our customers, and our corporate values of accountability and pride in our operations. CP is committed to collecting, storing and handling Confidential Information in a responsible manner in compliance with CP’s contractual obligations and with all Applicable Laws (“Applicable Laws” are as defined herein). In support of this, CP strives to ensure that all Confidential Information is classified as such and treated in the same manner as CP’s own information. This commitment extends throughout our operations, including Personal Information we collect with respect to customers, and includes providing options to request exclusion from certain databases and/or to be informed about how Personal Information is processed as and where appropriate. For greater certainty, this Policy does not vary or amend any contractual obligations that may otherwise be specifically set out in an agreement with CP.

CP strives to ensure that Confidential Information, whether in Canada, the United States or in a foreign country, is collected, stored and handled in a secure manner that protects it from unauthorized use and disclosure. In the ordinary course of business, CP may retain goods and services of third party providers who in turn collect, store or otherwise handle

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Confidential Information, which service provider may be located in a foreign country outside of the Canada and the United States. Personal Information that is collected, stored and handled by a third party provider in a foreign country, is subject to the laws of that country and may be lawfully accessed by that country's authorities.

Applicable Laws shall mean PIPEDA, as well as all similar applicable legislation that governs the protection and management of Personal Information about an identifiable individual.

3.0 Scope

This Policy applies to Confidential Information that CP may collect: (i) through the provisioning of our products and services; (ii) in person or by telephone; and (iii) from distributors, suppliers, vendors, and other business contacts. This Policy also applies to all Confidential Information collected through Internet sites and mobile applications operated by or on behalf of CP.

The Policy applies to all employees, directors, officers, agents, contractors and representatives (collectively, "CP Personnel"). With respect to CP Personnel who provide goods and/or services for CP and who are not in a direct employment relationship with CP, to the extent applicable, it is expected that such CP Personnel will either abide by the Policy or undertake, as a condition of their engagement with CP, to adhere to the principles and standards of business conduct consistent with the Policy.

4.0 Collection Practices

In the ordinary course of conducting business with CP, CP may be provided with, collect or generate Commercial Information in relation with its customers. For greater clarity, Commercial Information generated in the course of conducting business with CP that is subject to this Policy does not include CP's own information which may itself be confidential and/or proprietary to CP. It is expected that CP will collect only a minimal amount of Personal Information, and where Personal Information is collected, it will be limited only to such Personal Information that is necessary to provide a customer with the requested products and services.

That is, a representative of a customer may be required to provide information such as name, assigned user name, password, account number, contact information and other Personal Information that is not Commercial Information for a variety of purposes, including but not limited to (the "Purposes"):

- verifying identity and authority;
- complying with applicable legal requirements of any authority having jurisdiction;
- performing transactions and responding to the customer's requests, including providing customer service and addressing inquiries;

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- improving CP's services and websites to improve ease of use;
- protecting the security and effective functioning of CP websites and information technology systems;
- providing relevant communications on services, where CP has obtained a customer's consent; and
- sharing information collected with CP's affiliates and other third party goods and services providers that CP uses to help run its business—such as vendors or website hosts.

Personal Information may also be collected by way of "cookies" or other tracking technologies in order to identify the user and track user's preference. The sites within www.cpr.ca that use cookies allow CP to better serve customers when they return to CP's website. A customer can set its browser to notify it when it receives a cookie, giving it the opportunity to decide whether to accept the use of cookies or not.

Different CP Internet sites, mobile applications, products and services have different purposes and features. If a specific CP Internet site, application, product or service requires the additional collection, use or disclosure of Personal Information or Commercial Information, then CP provides those specifics separately on, or with, the relevant Internet site, application, product, or service. Each such specific privacy disclosure, policy, or statement supplements and amends this Policy.

5.0 Commitments

CP's commitments are internally developed with the aim to drive application of privacy and confidentiality protection across CP's operations. These commitments support CP's dedication to and respect for the privacy and confidentiality of CP's customers by implementing best practices for privacy and confidentiality management, and by ensuring compliance with regulatory requirements.

CP is committed to advancing the following:

- Establishing appropriate safeguards to protect Confidential Information and ensure that Personal Information will only be used or disclosed for the Purposes;
- Establishing appropriate safeguards to protect Commercial Information and ensure that it will only be used or disclosed for the purpose of performing business functions such as accounting, billing, auditing, account reconciliation, recording and tracking business activities, assessing service level, statistical analysis, research and development of business models, and promotion and marketing of CP's products and services;
- Classifying and treating Confidential Information in the same manner as CP's own confidential information.

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- Requiring that third parties in possession of Confidential Information, whether they are located in Canada, the United States or in a foreign country, ensure that such Confidential Information be collected, stored and handled in an appropriate manner that protects it from unauthorized use and disclosure.
- Specifically in relation to Personal Information, treating Personal Information in the same manner as all other Personal Information collected, stored and handled by CP. Additionally, CP will allow customers to decide how Personal Information is collected, used, retained, and processed through the following (as applicable to CP):
 - Opt-out option to be made available where practicable;
 - Opt-in consent required where required by Applicable Laws or otherwise practicable;
 - Option to request access to Personal Information CP holds;
 - Option to request Personal Information be transferred to other service providers where practicable; or
 - Option to request data be corrected and/or deleted; and
- Maintaining a log of data breaches in relation to loss, or unauthorized access or disclosure, of Personal Information, including incident description.

6.0 Implementation

- Implementation of the Policy is led by the AVP Customer and Corporate Services. All CP Personnel are responsible for implementing the Policy in their work and processes they oversee.
- Full implementation of all commitments and appropriate monitoring and reporting requires a period of transition. CP will review procedures, communication and training needs and other documents or processes to provide for alignment, consistency and effective governance of the Policy. Accordingly, the current projected completion date for implementation of the Policy will be July 29, 2022.
- CP Personnel and the public can report known or suspected issues of non-compliance with this Policy directly to their manager or anonymously by using CP's independently managed Alert Line (A-Line) at 1-888-279-6235 or <http://secure.ethicspoint.com/domain/media/en/gui.22547/index.html>.
- As a customer, if you have questions or concerns about our privacy practices or wish to make a request regarding Personal Information, contact us at:

Canadian Pacific
Attention: Chief Privacy Officer
Building 1, 7550 Ogden Dale Road S.E.
Calgary, AB T2C 4X9
Email: Chief_PrivacyOfficer@cpr.ca

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7.0 Monitoring and Reporting

CP shall:

- Monitor compliance to this Policy, including periodic compliance audits, and may establish any disciplinary action in the case of breach or non-compliance;
- Maintain a company-wide risk/compliance management system in which privacy concerns are monitored;
- Report periodically on CP's performance and compliance with this Policy as overseen by the AVP Customer and Corporate Services and report results to CP's Executive Committee, President and CEO and the Risk and Sustainability Committee of the Board of Directors; and
- Report aspects of performance under this Policy through CP's Biannual Corporate Sustainability Report.

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