



## FRONTERA ENERGY CORPORATION

### GENERAL PRIVACY POLICY

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#### 1. Introduction

Frontera Energy Corporation and its subsidiaries (together, the “**Corporation**”) are committed to controlling the collection, use and disclosure of personal information. For this purpose, “**personal information**” means any information about an identified or identifiable individual.

The Corporation has developed this general privacy policy (the “**General Privacy Policy**”) to help harmonize basic principles concerning the protection of privacy and individual liberties where the Corporation has business operations.

Without limiting the foregoing, these principles should help as a basis for personal information treatment whenever the Corporation acts as data controller; without prejudice for respecting the existing principles national legislations may have. For this purpose, “**data controller**” means a party who, according to domestic law, is competent to decide about the contents and use of personal information regardless of whether or not such data are collected, stored, processed or disseminated by that party or by an agent on its behalf.

The principles set out in this General Privacy Policy seek to balance the right of privacy of an individual with respect to their personal information and the Corporation’s need to collect, use or disclose personal information for legitimate business purposes, on a standard of what a reasonable person would consider appropriate in the particular circumstances. By developing this General Privacy Policy in accordance with the OECD “Guidelines on the Protection of Privacy and Transborder Flows of Personal Data”, the Corporation intends to demonstrate its commitment to respect the value for privacy of information.

It is the Corporation’s intention to comply with local regulations and applicable laws concerning privacy and data protection. For this purpose, as part of its privacy policy initiatives, the Corporation has also developed local documents or guidelines (the “**Guidelines**”) to implement local privacy rules in its data management and privacy procedures. The Guidelines will complement this General Privacy Policy and can be consulted at the following link: [www.fronteraenergy.ca](http://www.fronteraenergy.ca). In the event of a conflict between this General Privacy Policy and either a local Guideline or law applicable in a given circumstance, the applicable local Guideline or law shall govern.

As a general proposition, except as described in each local Guideline, any personal information that the Corporation collects will not be disclosed to third parties. The intent is that the information will generally be used solely by the Corporation. However, the Corporation may disclose personal information to third parties in order to improve the integrity of the information collected, to assist in maintaining security over the information collected, to other reasonable business purposes or as may be required by law.

#### 2. Principles

The Corporation recognizes that controlling and safeguarding the collection, use and disclosure of personal information is an ongoing process. The Corporation is committed to reviewing this General Privacy Policy on an ongoing basis. As part of this commitment the Corporation invites all interested parties to review the following privacy principles listed below:

### **Collection Limitation Principle**

The Corporation will limit the collection of personal information, and any such information shall be obtained by lawful and fair means and, where appropriate, with the knowledge and consent of the data subject, except where not required by applicable law.

### **Data Quality Principle**

The personal information the Corporation collects shall be relevant to the purposes for which it is to be used, and shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

### **Purpose Specification & Use Limitation Principles**

The purposes for which personal information is collected shall be specified by the Corporation not later than at the time the personal information is collected. The Corporation's subsequent use and disclosure of the personal information shall be limited to the fulfilment of those purposes for which it was collected, except with the consent of the individual or as required or permitted by applicable law.

### **Security Safeguards Principle**

Personal information shall be protected by reasonable security safeguards against such risks as loss, theft or unauthorised access, collection, destruction, copying, use, modification, disposal or disclosure.

### **Openness Principle**

The Corporation will make readily available to individuals specific information about its policies and practices relating to the management of personal information, in the form(s) prescribed by applicable law.

### **Individual Participation Principle**

The Corporation shall give effect to any rights that individuals may have with respect to their personal information, depending on the jurisdiction in which they are located. For example, subject to certain limitations as required or permitted by applicable law, the Corporation shall give effect to any statutory right an individual has:

- a) to obtain confirmation of whether or not the Corporation has personal information relating to the individual;
- b) to access personal information the Corporation holds about the individual;
- c) to be given reasons if a request made under subparagraph (a) or (b) is denied, and to be able to challenge such denial; and/or
- d) to challenge the accuracy or completeness of personal information about the individual that the Corporation holds and, if the challenge is successful, to have that information rectified, completed or amended, depending on the circumstances and the jurisdiction of the individual.

The Corporation will respond to an individual's request within the time period prescribed by applicable law, and generally at minimal or no cost to the individual. The requested information will be provided or made available in a form that is generally understandable.

### **Accountability Principle**

The Corporation shall be accountable for complying with measures which give effect to the principles stated above.

### **3. Currency of this Policy**

This is a Board Policy and it was last revised as of January 15, 2023.