

# WESDOME GOLD MINES LTD. PRIVACY POLICY

## PURPOSE

The Privacy Policy (the “**Policy**”) of Wesdome Gold Mines Ltd. (the “**Company**”) outlines the Company’s practices for collecting, using and disclosing personal information. This Policy is subject to the provisions of applicable privacy laws and does not replace or override those laws.

## APPLICATION

This Policy applies to personal information about individuals and does not apply to the information collected, used or disclosed with respect to corporate or commercial entities. For the purposes of this Policy, “**personal information**” means any information about an identifiable individual, other than a person’s business title or contact information when used or disclosed solely for the purposes of the Company’s business communications. Personal information does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual). Examples of personal information include, but are not limited to: birthdate, home address, social insurance number, etc. This Policy does not impose any limits on Wesdome’s collection, use or disclosure of the information exempted under applicable privacy legislation, including an individual’s i) name, title, business addresses and business telephone numbers; and ii) certain publicly available information. This Policy does not impose limits on Wesdome’s collection, use or disclosure of information exempted under applicable privacy laws, including certain publicly available information.

## RESPONSIBLE PERSON

The Company’s designated Privacy Officer, the Chief Governance Officer and Corporate Secretary, is responsible for this Policy.

## COLLECTION

Wesdome may collect your personal information to establish, manage or terminate your employment relationship, and for other purposes authorized or required by law. For example, the Company may collect your personal information:

- to make hiring or other employment related decisions (including employment history, reference checks, academic history, criminal record checks, credit checks, driving abstracts or other specific background checks as required);
- to administer and maintain payroll, employment benefits, IT accounts and other employee records;
- to authenticate your identity;
- to monitor your compliance with any of your agreements with Wesdome and its policies, and to administer the provision or receipt of products or services under those agreements;
- to determine eligibility for, provide, administer and document any employee work-related claims (e.g. worker compensation, insurance claims, etc.) and/or leaves or absences from work;
- to manage or transfer Wesdome assets or liabilities, for example in the case of an acquisition, disposition, business combination or merger;

- to protect Wesdome, yourself and others from fraud and error and to safeguard Wesdome's business interests;
- to collect debts owed to Wesdome;
- to comply with legal and regulatory requirements; and
- to assist the Company in any dispute, mediation, arbitration or litigation involving the Company or you in any capacity.

The Company may collect this information from you directly, from your references and from third parties and other data sources.

The Company may transfer your personal information across provincial or national borders to fulfil any of the above purposes (including both the necessary and optional purposes), including to service providers located in the United States of America and other countries outside of Canada who may be subject to applicable disclosure laws in those jurisdictions, which may result in that information becoming accessible to law enforcement and national security authorities of those jurisdictions.

## USE AND DISCLOSURE

Unless authorized or required by law, Wesdome will only use or disclose personal information where necessary to fulfil the purposes for which that information was collected.

When your personal information is to be used or disclosed for a purpose not previously identified, the new purpose will be communicated to you before such use or disclosure, and your consent will be sought unless the use is authorized or required by law.

## CARE AND RETENTION OF PERSONAL INFORMATION

Wesdome has implemented reasonable physical, technical and procedural safeguards and measures to protect personal information that is obtained by the Company against unauthorized access, collection, use, disclosure, copying, modification or similar risks, and will use appropriate security measures when destroying any personal information.

Wesdome will review and update its security controls from time to time to ensure ongoing personal information security.

The Company may keep personal information it obtains for so long as necessary or appropriate to carry out the purpose(s) for which such information was collected or for such longer period as may be required or permitted by applicable laws and regulations. Except where required or authorized at law, when personal information is no longer required for the purposes for which it has been collected, such personal information will be made anonymous or securely destroyed.

## CONSENT

Wesdome will obtain your consent to collect, use or disclose personal information except where we are authorized or required to do so without consent. Your consent can be express, implied or given through an authorized representative, such as a lawyer, agent or broker.

Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify the Company that you do not wish your personal information collected/used/disclosed for various purposes after you have received notice of those purposes) or otherwise.

Applicants for employment who have not been hired by us may withdraw their consent to our continued use and disclosure of their personal information by contacting our Privacy Officer using the contact information provided below.

Employees may also withdraw their consent to our continued use and disclosure of certain information for certain purposes, provided that we do not need to continue using or disclosing that information for those purposes. Employees should contact our Privacy Officer if they wish discuss this.

## ACCURACY

Wesdome will take reasonable steps to ensure that all personal information collected, used or disclosed by the Company is accurate and current. Wesdome will amend the personal information if you are able to demonstrate the inaccuracy or incompleteness of the information, as required. If appropriate, we will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, Wesdome will annotate the personal information under the Company's control with a note that the correction was requested but not made.

## ACCESS TO PERSONAL INFORMATION

On written request and with authentication of identity having been provided, Wesdome will provide you with:

- your personal information under the Company's control;
- information about the ways in which that information is being used; and
- a description of the individuals and organizations to whom that information has been disclosed.

Wesdome will make the information available within 30 days or provide written notice where additional time is required to fulfil the request.

All requests should be made in writing to Wesdome's Privacy Officer at:

Wesdome Gold Mines Ltd.  
220 Bay Street, Suite 1200  
Toronto, ON M5J 2W4  
Attention: Privacy Officer

In some situations, Wesdome may not be able to provide access to certain personal information. This may be the case where, for example, disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purpose of an investigation or where disclosure of the information would reveal confidential information that, if disclosed, could harm the Company's competitive position or reputation. Wesdome may also be prevented by law from providing access to certain personal information.

Where an access request is refused, Wesdome will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

## REVIEW OF POLICY

The Governance and Nominating Committee and the Compensation and Human Resources Committee and the Board of Directors will review and evaluate this Policy on an annual basis to determine whether the Policy is effective.

## QUESTIONS

Questions about this Policy should be directed to Privacy Officer at the address listed above.

## REVIEW AND APPROVAL

OWNER	ADOPTED
Board of Directors	Adopted on November 6, 2019
POLICY TYPE	LAST REVIEWED AND APPROVED
Entity Level	November 3, 2020
POLICY NO.	REVIEW SCHEDULE
EL-008	Annual