

Privacy Policy

Personal Information Protection and Electronic Documents Act “PIPEDA”
– January 1, 2004

Privacy Procedures and Processes with regard to our Customers

Federal Government legislation regulates how businesses collect, use and disclose customer information. This Act came into effect January 1, 2004. A customer must consent to a utility’s collection, use or disclosure of their personal information.

Considered personal information of a customer:

- name, address, telephone number, email address, identification numbers;
- utility installation and usage information;
- opinions, evaluations, comments, social status;
- credit records, medical information, existence of a dispute between a consumer and merchant, consumer intentions (example: to acquire services)

To ensure customer privacy is protected, we operate under these PIPEDA-established “10 Principles of Fair Information Practices”

1. Accountability; 2. Identifying purposes; 3. Consent; 4. Limited collection; 5. Limiting use, disclosure and retention; 6. Accuracy; 7. Safeguards; 8. Openness; 9. Individual access 10. Challenging compliance.

- A customer’s personal information will continue to be treated responsibly.
- No more information than is reasonably necessary will be collected from a customer.
- The purposes for the information are documented and identified to the individual providing the information. A reasonable individual would consider the purposes appropriate and necessary.
- A customer’s personal information is secure from unauthorized use or disclosure, and, when no longer required, is erased.
- A customer is informed of the existence of his personal information, provided with the reasons for our collection, use and disclosure of it.
- A customer has a right to access and challenge the accuracy of his

information, and have it corrected where necessary.

- A customer has a right to lodge a complaint to the Privacy Commissioner, resulting in an investigation, which may lead to a Federal Court proceeding, and, any resulting damages may be ordered paid.

Uses for a Customers Personal Information

A customer's personal information is necessary for the establishment of an account, and the billing and collecting of amounts owing, including verifying creditworthiness. Any contact name and numbers are required in the event a customer's service will be affected, to identify customer preferences or to establish customer preferences. Ongoing billing, collecting and maintenance of an account requires that personal information is recorded with any customer account.

Consent for Collection, Use of Disclosure of Personal Information

Consent is agreement by the customer, to obtain, use or disclose his personal information. A customer consents when service is being arranged. The reason for the information is explained to the customer. Personal information is necessary in order that we may do business with the customer.

Disclosure of a Customers Personal Information

We will keep customer's personal information confidential, and will not disclose to any party, without the customer's written consent except for:

- Billing or market operation purposes
- Law Enforcement or legal authorizations
- Processing account debts

Compliance

The utility has a compliance official responsible for overseeing all privacy-related matters, and, upon request, that official will be identified.

Protection of Information

Customer personal information is treated confidentially, utilized legitimately and responsibly by staff in the day-to-day business operations. Any of our business resource contractors provide a comparable level of protection with regard to customer personal information, to comply with PIPEDA.

Our technology is protected with appropriate firewalls and access to

records restricted to users with a legitimate need.

Responding to Inquiries and Complaints

Requests must be in writing for release of the utility's privacy policy and/or for access to the individual's personal information, requested by the requesting individual or their designate.

A fee, if required, will be reasonable, based on length of time spent or to be spent on retrieving the customer's personal information; the customer will be advised in advance if a fee will be required.

The utility will issue any refusals to provide information, with reasons, in writing, within 30 days.

The utility reserves the right to exceed the 30 day time limit, to allow for any necessary consultations, or, if in the event that business activities would be unreasonably affected by the time constraint.

Responses to privacy complaints whereby the individual has challenged compliance are fully investigated, and remedial measures implemented and documented, where necessary.

Privacy Commitment

The utility, as a services provider, is committed to maintaining confidentiality of personal information.

Working within the Privacy Legislation, we will:

- Ensure consent, whether implied, written contract or oral
- Allow an individual access to their personal information
- Properly collect, use and/or disclose necessary and reasonable personal information
- Correct inaccurate or incomplete information
- Provide access to personal information in an alternative format to an individual with a sensory disability
- Use appropriate safeguards to protect personal information