

Privacy Policy (Revision 04/18/18)

1.0 PURPOSE

- 1.1. This Policy explains how Alectra collects, uses, discloses and safeguards the personal information that its customers or a third party provides to Alectra. Providing personal information or authorizing a third party to disclose personal information to Alectra signifies consent to Alectra Inc.'s collection, use and disclosure of personal information in accordance with this Policy.
- 1.2. For the purposes of this Policy, "personal information" means information that can identify an individual directly or through other reasonably available means. The meaning of "personal information" shall be interpreted in a manner that conforms with the minimum requirements of applicable provincial and federal privacy legislation.

2.0 SCOPE

- 2.1 This Privacy Policy applies to Alectra and its subsidiaries or affiliates, (collectively "Alectra"). Alectra values the trust that you, the customer, have placed in its business. Alectra has adopted this Privacy Policy (the "Policy") to affirm its commitment to maintaining the accuracy, confidentiality, and security of personal information.

3.0 APPLICABLE GOVERNMENT LEGISLATION

- 3.1 Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M.56 - [Link](#)
- 3.2 Personal Information Protection and Electronic Documents Act - [Link](#)

4.0 POLICY

Alectra's Privacy Policy, which due to privacy laws is applicable to individuals and not to businesses, will be available on Alectra's public website and may be changed from time to time. The current version reads as follows:

4.1 Purpose

- 4.1.1 Alectra will identify the purpose for collecting your personal information at or before the time it is collected.

4.1.2 Alectra collects, uses and discloses personal information about you for purposes which are permitted or required by law. Examples of such purposes would be delivering electricity, construction, and maintenance services; contacting customers; providing information to customers about Alectra rates, programs, initiatives or services, or the electricity industry; verifying a customer's identity; managing any special needs of customers; monitoring or assessing quality of service by means such as recording telephone conversations; responding to customer inquiries; determining a customer's credit rating; providing information to third party service providers; investigating, reporting or responding to government inquiries related to error, fraud or theft, dangerous use of power or other unlawful activities; protecting the rights, property, and safety of Alectra, its employees, customers and others; billing or collecting bills; conducting customer surveys, contests and consultations; promoting and administering conservation and demand management programs; preparing financial records; facilitating a business transaction involving Alectra assets; meeting regulatory and legal requirements; and responding to requests in criminal investigations, legal or tax proceedings or pursuant to a court order.

4.2 Consent; Limiting the Collection, Use and Disclosure of Your Personal Information

4.2.1 Alectra will not collect, use or disclose your personal information without your informed consent, unless required or permitted to do so by law. Consent may be provided orally, in writing, electronically or may be implied. Subject to certain legal restrictions and reasonable notice, you can refuse to provide your consent or withdraw your consent to the collection, use and disclosure of your personal information but refusing to provide consent or withdrawing consent may limit Alectra's ability to provide you with some of its products or services. Under the laws of Canada and Ontario, Alectra may have a duty or right to collect, use or disclose your personal information without your knowledge or consent.

4.2.2 Alectra limits collection of personal information to that information, which is necessary for the purposes identified in this Policy, is otherwise consented to by you, or permitted or required by law. The examples of type of personal information that Alectra may request or keep include: name, address, phone number, email address, account number, driver's licence details, date of birth, banking information, service orders, electricity usage, invoice history, and billing history.

- 4.2.3 Personal information may be collected in a number of ways, including in person, over the phone, by mail, by fax, over the Internet, or from third parties who have been authorized to disclose personal information to Alectra.
- 4.2.4 Web cookies are very small text files that are stored on your computer from a webpage to keep track of information about your browsing on that site. Through the use of web cookies or other tracking providers, when you visit Alectra's website, Alectra may capture standard web traffic information, such as the time and date you visited the website, your IP address, and your browser information. In no circumstances do the cookies or other tracking provider capture any information that can personally identify you.
- 4.2.5 If you believe that a third party has inappropriately disclosed your personal information to Alectra, please contact that third party directly. If the third party does not sufficiently respond to your inquiries, please let Alectra know immediately.
- 4.2.6 Alectra will only disclose your personal information to third parties if you have so consented or if required or permitted by law. Only the information specifically requested is disclosed. If a request is made to Alectra by phone, Alectra will take steps to verify the caller's identity. Where a request for personal information is made by a governmental authority, Alectra will take steps to satisfy itself that the authority making the disclosure request has legitimate grounds to do so.
- 4.2.7 Alectra may disclose your personal information to third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of Alectra's business or assets (including accounts) for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, for example, permitting such parties to determine whether to proceed or continue with the transaction, fulfilling any reporting or audit requirements to such parties, and/or disclosing personal information as part of concluding a sale or transfer of assets.
- 4.2.8 Alectra may perform activities outside of Canada through third parties and in such cases, your personal information may be processed, used, stored or accessed in other countries and will be subject to the laws of those countries. For example, information may be disclosed in response to valid demands or requests from governmental authorities, courts, or law enforcement in other countries.

4.2.9 Except as specifically provided for in this Policy Alectra does not disclose any personal information to third parties.

4.3 Keeping Your Information Accurate

4.3.1 Alectra will make reasonable efforts to keep your personal information as accurate, complete and up-to-date as necessary. If desired, you may verify the accuracy and completeness of your personal information in Alectra's records in accordance with Section 4.6.1 below.

4.3.2 Despite Alectra's best efforts, errors may occur. Should you identify any incorrect or out-of-date information in your file, Alectra will remedy any such errors on a timely basis upon receipt of notice from you of such incorrect or out-of-date information. In the event that inaccurate information is mistakenly sent to a third party, Alectra will communicate relevant changes to the third party where appropriate and possible.

4.4 Protecting Your Personal Information

4.4.1 Alectra employees understand the importance of keeping personal information private and are required to abide by Alectra's privacy standards. All employees are required to agree to a code of conduct that prohibits employees from accessing or disclosing personal information without authorization and prohibits the disclosure of any personal information to unauthorized parties. The failure to comply with this code of conduct will result in appropriate disciplinary measures.

4.4.2 Except as otherwise permitted or required by law, your personal information will be retained for so long as is reasonably necessary to fulfil the purposes for which it was collected.

4.4.3 To ensure that your personal information is protected, Alectra utilizes security safeguards that are consistent with the industry standard. Alectra uses modern technologies to ensure that personal information is not compromised. Alectra server environment and firewall infrastructure are well-maintained and its security practices are reviewed on a regular basis.

4.4.4 Customers who call Alectra's customer service centre will be required to verify their identity. Alectra keeps electronic customer files in a highly secured environment with restricted access. Paper-based files are stored in locked filing cabinets to which access is also restricted. Safeguards include physical, organizational, and technical measures, including but not limited, to:

- 4.4.4.1 Security card access to premises.
- 4.4.4.2 Restriction of employee access to files on a “need to know” basis.
- 4.4.4.3 Confidentiality undertakings by all employees.
- 4.4.4.4 Securing personal information and not leaving it unattended or in plain view.
- 4.4.4.5 Firewalls, antivirus, passwords, encryption and software solutions for technical security.
- 4.4.4.6 Regular reviews of privacy compliance initiatives.
- 4.4.4.7 Regular audit processes to assess controls in place.

4.4.5 Alectra requires its service providers and third party partners to contractually commit to protecting personal information and have mature security controls in place.

4.5 Openness

4.5.1 Upon request, Alectra will provide you with a copy of this Policy and its employees will discuss any of its content with you.

4.5.2 Upon request, Alectra will also inform you of the type of personal information it has collected about you, how it has been used and, where permitted by law, the names of any third parties to whom your personal information has been disclosed.

4.5.3 Any changes to Alectra’s privacy standards and information handling practices will be reflected in this Policy in a timely manner. Alectra reserves the right to change, modify, add to, or remove portions of this Policy at any time. Please check this page periodically for any modifications. To determine when this Policy was last updated, please refer to the revision date at the top of this Policy.

4.6 Individual Access

4.6.1 Alectra will provide you access to your personal information within a reasonable time and no later than 30 days after receipt of a written request and satisfactory identification. Alectra may charge a reasonable fee for producing the requested information and will notify you of the costs before processing the request.

4.6.2 Alectra may deny access to personal information where permitted or required by law. In this case, Alectra will provide in writing its reasons for the refusal. Such refusal may be challenged by a customer in accordance with law.

4.7 Challenging Compliance

4.7.1 Alectra is prepared to respond to any enquiry or concern you may have regarding this Policy. Please direct all questions or enquiries about this Policy to the Privacy Officer as follows:

Name, Title:

Indy Butany-DeSouza, Vice President, Regulatory Affairs & Privacy Officer

Mailing Address:

2185 Derry Road West, Mississauga, Ontario L5N 7A6

E-mail: PrivacyOfficer@alectrautilities.com

Phone: (905) 821-5727

Fax: 1-866-458-1236

4.7.2 Alectra will investigate any privacy issue that is brought to its attention and provide you with its findings. Should you be unsatisfied with the response, you may contact the Office of the Privacy Commissioner.

4.8 Websites Governed by this Privacy Policy

4.8.1 Alectra's website www.Alectra.com is governed by the provisions and practices stated in this Policy. The website may contain links to third party sites that are not governed by this Policy. Although Alectra endeavours to only link to sites that share its commitment to your privacy, please be aware that this Policy will no longer apply once you leave Alectra's website and Alectra is not responsible for the privacy practices of third party sites. Alectra therefore suggest that you closely examine the respective privacy policies of third party websites to learn how they collect, use and disclose your personal information.

4.9 Governing Law

4.9.1 This Policy and all related matters are governed solely by the laws of Ontario and the applicable federal laws of Canada.