



# WATERLOO NORTH HYDRO INC.

## Privacy Policy Statement

### **Preface**

Waterloo North Hydro Inc. (referred to as “Waterloo North Hydro”) is committed to keeping the personal information of its customers accurate, confidential, secure and private. Our Privacy Policy has been designed to inform employees, customers, and third parties of Waterloo North Hydro of our commitment and recognition to our obligation to meet the spirit and terms of the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

### **Contents**

Our Privacy Policy describes the principles by which Waterloo North Hydro protects the privacy of personal information in its possession. It addresses the reasons why such information is collected, how it is used, how its confidentiality is protected and outlines the customers’ rights in respect of this information. Our Privacy Policy incorporates and expands on the 10 principles for the protection of personal information, as devised by the Canadian Standards Association (CSA).

The Privacy Policy applies to personal information about the customers of Waterloo North Hydro and other individuals that is collected, used or disclosed by Waterloo North Hydro. This Privacy Policy does not apply to information about corporate customers and does not apply to information about the employees of Waterloo North Hydro. Waterloo North Hydro does, however, protect the confidentiality of such information in accordance with the law and our own policies.

### **Personal Information Protection Principles**

#### **1. Accountability**

Waterloo North Hydro is accountable for the protection of all personal information within the organization's possession or control, including any personal information that has been transferred to a third party for regulatory, legal or processing purposes. Waterloo North Hydro will require a comparable level of protection of this information from its third party relations.

Waterloo North Hydro has established a Privacy Office, which has overall responsibility for our protection of personal information and for Waterloo North Hydro’s compliance with this Privacy Policy.

#### **2. Identifying Purposes**

Personal information that Waterloo North Hydro collects from customers includes:

- the customer’s name and address and other contact information, such as telephone numbers, email address;
- the meter number;
- facts about consumption of power, both historic and current;



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- information about a customer's transactions with us, such as account numbers, account balances, payment history;
- credit and reference information, such as date of birth, employment information, drivers license, previous addresses, and general financial information;
- medical information to be used in case of emergency power outages; and
- bank information for pre-authorized payments.

When an individual applies for service, Waterloo North Hydro will make the individual aware of the purposes for which Waterloo North Hydro is requesting the personal information. If Waterloo North Hydro identifies other purposes for which the personal information may be used, Waterloo North Hydro will seek the individual's consent prior to such use. Waterloo North Hydro will advise that it is the individual's right to refuse permission for Waterloo North Hydro to use personal information for any new purposes.

Additional purposes for collecting personal information may be identified to an individual before or at the time of collection. However, at a minimum Waterloo North Hydro will collect personal information for the following purposes:

- To verify the customer's identity;
- To determine the customer's eligibility for products or services;
- To provide the customer with continuous electric service and to bill the customer for that service;
- To assist us in updating the customer's creditworthiness and the collection of accounts;
- For pre-authorized payments for services;
- For priority restoration of electric service to the correct address and meter, as may be required by medical circumstances;
- To respond to the customer's inquiries about energy use and billing;
- To prevent fraud with respect to both the customer and our company;
- To meet legal, regulatory and settlement requirements.

### **3. Consent**

The knowledge and consent of an individual are generally required for the collection, use or disclosure of personal information and Waterloo North Hydro will seek to obtain consent before or when it collects, uses or discloses personal information about an individual. An individual can provide consent to the collection, use and disclosure of personal information about them expressly or implicitly. However, Waterloo North Hydro will collect, use or disclose personal information without an individual's knowledge and consent only in limited circumstances and as permitted by law, such as in the case of an emergency where the life, health or security of an individual is threatened. Subject to certain legal and contractual restrictions and reasonable notice, an individual can refuse or withdraw their consent to the collection, use or disclosure of personal information about them at any time.



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All existing customers will be informed of what types of personal information have been collected, the purpose for the collection and the procedures available for contacting Waterloo North Hydro with any inquiries. All new customers will be provided with a consent form and an accompanying explanation about the collection, use and disclosure of their personal information when requesting service.

#### **4. Limiting Collection**

Waterloo North Hydro limits the amount and type of personal information it collects to that which is necessary for the business of the utility and as permitted by law. Each affiliate of Waterloo North Hydro will be responsible for its own collection, use and disclosure of information. Personal Information will be collected using procedures that are fair, transparent and lawful.

#### **5. Limiting Use, Disclosure and Retention**

Waterloo North Hydro will only use the personal information for the purpose for which it was collected as identified in principle #2, unless consent is given by the individual to use or disclose it for another purpose or as is required by law. Waterloo North Hydro will develop explicit retention periods for closed accounts, after which the personal information will be destroyed or made anonymous.

Under certain exceptional circumstances, Waterloo North Hydro may have a legal duty or right to disclose personal information without the individual's knowledge or consent.

#### **6. Accuracy**

Waterloo North Hydro shall take all reasonable steps to ensure that all personal information will be kept accurate, complete and up to date.

Individuals may challenge the accuracy and completeness of personal information about them and have it amended, as appropriate.

#### **7. Safeguards**

In executing its responsibilities with respect to the confidentiality of personal information, Waterloo North Hydro will employ a number of safeguards, appropriate to the sensitivity of the information, to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards will include physical measures, organizational measures and technological measures, for example locked filing cabinets, restricted access to offices, security clearances, limiting access on a “need to know” basis and the use of passwords and encryption. Procedures for implementing these measures will be communicated to all employees and third parties to ensure compliance with this principle.



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### **8. Openness**

Waterloo North Hydro will make its policies and practices relating to the protection of personal information available to its customers. Waterloo North Hydro will keep its customers informed of these policies and practices and customers shall be provided access to all related policies and procedures via Waterloo North Hydro's web page and bill inserts. The information will be available in a format that is easy to understand.

### **9. Individual Access**

Any customer of Waterloo North Hydro can have access to the personal information about them that Waterloo North Hydro has in its possession or control. Any customer may request that their personal information be amended for purposes of accuracy and completeness.

Customers can make their requests by telephone (519-886-5090), via email ([privacy@wnhydro.com](mailto:privacy@wnhydro.com)) or in writing (526 Country Squire Road, P.O. Box 640, Waterloo, Ontario, N2J 4A3, Attention: Privacy Officer). Response to an individual's request will be made in a timely and efficient manner.

### **10. Challenging Compliance**

Any customer of Waterloo North Hydro may challenge Waterloo North Hydro's compliance with this Privacy Policy by contacting Waterloo North Hydro directly. Waterloo North Hydro has policies and procedures to receive, investigate and respond to individuals' complaints and questions.