



## **WATERLOO NORTH HYDRO INC.**

### **Privacy Policy Statement**

#### **Preface**

Waterloo North Hydro Inc. (referred to as “WNH”) 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 WNH 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 WNH 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 adopted and amended by PIPDEA, and established by the Canadian Standards Association (CSA).

1. Accountability
2. Identifying Purposes
3. Consent
4. Limited Collection
5. Limited Use, Disclosure, and Retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual Access
10. Challenging Compliance

Personal information is information about an identified or identifiable individual. Personal information may include such information as your name, email address, mailing address, financial information, birth date, and other information about you collected electronically, in person or by telephone.

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

#### **Personal Information Protection Principles**

##### **1. Accountability**

WNH 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. WNH will require a comparable level of protection of this information from its third party relations.

If you have questions or concerns regarding your personal information or this privacy policy, please address them to:



## **WATERLOO NORTH HYDRO INC. Privacy Policy Statement**

Waterloo North Hydro  
526 Country Squire Rd.,  
Waterloo On N2J 4G8  
Attention: Privacy Officer

Or

Email: [privacy@wnhydro.com](mailto:privacy@wnhydro.com)

### **2. Identifying Purposes**

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

Personal information that WNH 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;
- 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, driver's 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.

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

- To verify the customer's identity;
- To monitor and assess quality of service (for example, WNH may monitor and/or record telephone communication with you for quality assurance and training purposes);
- 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.



## **WATERLOO NORTH HYDRO INC.**

### **Privacy Policy Statement**

#### **3. Consent**

The knowledge and consent of an individual are generally required for the collection, use, disclosure of personal information and WNH 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, WNH 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.

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 WNH 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**

WNH 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 WNH 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**

WNH 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. WNH will develop explicit retention periods for closed accounts, after which the personal information will be destroyed, erased, or made anonymous.

Our billing, settlement and regulatory relationship with third parties are governed by our license and regulatory codes that are established by the Ontario Energy Board. Under certain exceptional circumstances, WNH may have a legal duty or right to disclose personal information without the individual's knowledge or consent.

#### **6. Accuracy**

WNH 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, WNH 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



## **WATERLOO NORTH HYDRO INC. Privacy Policy Statement**

be communicated to all employees and third parties to ensure compliance with this principle.

### **8. Openness**

WNH will make its policies and practices relating to the protection of personal information available to its customers. WNH will keep its customers informed of these policies and practices, customers shall be provided access to all related policies and procedures via WNH'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 WNH can have access to the personal information about them that WNH has in its possession or control. Any customer may request that their personal information and with satisfactory proof of the customer's identity be amended for purposes of accuracy and completeness.

Customers can make their requests by email ([privacy@wnhydro.com](mailto:privacy@wnhydro.com)) or in writing to:

Waterloo North Hydro  
526 Country Squire Rd,  
Waterloo, On N2J 4G8  
Attention: Privacy Officer

Response to an individual's request will be made in a timely and efficient manner.

### **10. Challenging Compliance**

Any customer of WNH may challenge WNH's compliance with this Privacy Policy by contacting WNH's Privacy Officer set out above the heading "Accountability".

WNH shall investigate all complaints concerning compliance with this Privacy Policy. If a complaint is found to be justified, the company shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A customer shall be informed of the outcome of the investigation regarding his or her complaint.

## **WNH's Privacy Policy – Website**

### **1. Cookies**

WNH's website, online services and interactive applications may use "cookies" and other analytic technologies. These technologies help WNH measure performance and engagement while helping to make your online experience with WNH more convenient and personal. The purpose of any data collection by these technologies is not to retain personal data but to enhance your online experience. Customers are free to prevent the installation of cookies by simply disabling this feature in your browser.

### **2. Links to Third-Party Sites**

WNH's Website contains links to third-party Websites. As such, WNH is not responsible for (a) any information you provide to other Websites outside of WNH Hydro's domain that you access through a link on our Website or (b) the privacy practices or the content of such Websites outside of WNH's domain.



## **WATERLOO NORTH HYDRO INC. Privacy Policy Statement**

### **3. Data Collection**

As is the case with Websites generally, when visitors access the WNH Website, the site software automatically collects the internet protocol (IP) address of the computer through which the user is connected to the Internet. The Website also automatically collects information about the user's Internet browser software, operating system, the date and time of the user's visit, the URL of the last page visited by the user before entering the website, and the pages accessed while on our site. This information is not used to gain personal information on individual users but is aggregated with that of other visitors to help us understand how the site is being used and how to make it better for our customers.