



## PRIVACY POLICY STATEMENT – HALTON HILLS HYDRO INC.

### Preface

Halton Hills Hydro Inc. is committed to keeping the personal information of its customers accurate, confidential, secure and private. Our Privacy Policy has been designed to inform employees, subcontractors and customers of Halton Hills Hydro Inc. of our commitment and recognition to our obligation to meet the spirit and terms of the ***Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)***.

### Contents

Our Privacy Policy describes the principles by which Halton Hills Hydro Inc. 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 the ten (10) principles for the protection of personal information, as devised by the Canadian Standards Association (CSA).

### Personal Information Protection Principles

#### 1. Accountability

Halton Hills Hydro Inc. 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. Halton Hills Hydro Inc. will require a comparable level of protection of this information from its third party relations.

Mr. David Smelsky, our Privacy Officer, has overall responsibility for our protection of personal information and for Halton Hills Hydro Inc.'s compliance with this Privacy Policy.

#### 2. Identifying Purposes

Personal information that Halton Hills Hydro Inc. collects from customers includes:

- The customer's name and address and other contact information, such as telephone numbers, email addresses;
- 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 reference information, such as date of birth, employment information, driver's license, previous addresses, and general financial information; and
- Bank information for pre-authorized payments.

When an individual applies for service, Halton Hills Hydro Inc. will make the individual aware of the purposes for which Halton Hills Hydro Inc. is requesting the personal information. If Halton Hills Hydro Inc. identifies other purposes for which the personal information may be used; Halton Hills Hydro Inc. will seek the individual's consent prior to such use. Halton Hills Hydro Inc. will advise that it is the individual's right to refuse permission for Halton Hills Hydro Inc. 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, Halton Hills Hydro Inc. will collect personal information for the following purposes:

- Billing and collection of payments for electric and water service;
- Pre-authorized payment for services;
- Priority restoration of electric service to the correct address and meter, as may be required by medical circumstances;
- Energy sector legal, regulatory and settlement requirements.

### **3. Consent**

Halton Hills Hydro Inc. will 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. Halton Hills Hydro Inc. will collect, use or disclose personal information without an individual's consent only in limited circumstances as permitted by law. 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 customers will be informed of the type of personal information that is collected, the purpose for the collection and the procedures available for contacting Halton Hills Hydro Inc. with any inquiries.

### **4. Limiting Collection**

Halton Hills Hydro Inc. limits the amount and type of personal information it collects to that which is necessary for the business of the utility. Personal information will be collected using procedures that are fair, transparent and lawful.

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

Halton Hills Hydro Inc. 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. Halton Hills Hydro Inc. will develop explicit retention periods for closed accounts (zero balance) after which the personal information will be destroyed or made anonymous.

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

### **6. Accuracy**

In order to ensure the reliable delivery of electric service and the correct billing for such service, 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, Halton Hills Hydro Inc. will employ a number of safeguards, appropriate to the sensitivity of the information, to protect personal information against loss of 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 and limiting access on a “need to know” basis and 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.

#### **8. Openness**

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

Customer can make their requests by telephone (519-853-3701 / 905-453-2222), via email ([inquiries@haltonhillshydro.com](mailto:inquiries@haltonhillshydro.com)) or in writing to: 43 Alice Street, Acton, ON L7J 2A9. Response to an individual’s request will be made in a timely and efficient manner.

#### **10. Challenging Compliance**

Any customer of Halton Hills Hydro Inc. may challenge Halton Hills Hydro Inc.’s compliance with this Privacy Policy by contacting Halton Hills Hydro Inc. directly. Halton Hills Hydro Inc. has policies and procedures to receive, investigate and respond to individuals’ complaints and questions. If the customer is not satisfied with the way Halton Hills Hydro Inc. has responded to a complaint, the customer can contact the Information and Privacy Commissioner of Ontario.