

hydroOne

PRIVACY CODE

NOVEMBER 2020



HYDRO ONE'S COMMITMENT TO PRIVACY

Hydro One is committed to protecting the privacy of all individuals, including our customers. As the largest electricity delivery company in Ontario, we collect, use and disclose our customers' personal information in order to provide electrical power to you. We strive to provide you with the best customer service and do so in compliance with our privacy obligations under the federal Personal Information Protection and Electronic Documents Act (PIPEDA).

Hydro One has established this Privacy Code to inform you about our practices and procedures concerning the collection, use and disclosure of your personal information including the ways we safeguard your personal information. This Code applies to information about identifiable individuals. This Code does not apply to information about businesses.

Hydro One may collect, use and/or disclose the personal information of individuals who are not customers or potential customers of our distribution business. These individuals may include, for example, property owners where Hydro One has easements on their property or members of the public who make enquiries of Hydro One related to a regulatory process such as an environmental site assessment or an application that we file with the Ontario Energy Board (OEB) for approval of electricity rates or to seek leave to construct a new transmission line.

By accepting electricity distribution service from us or providing us with your personal information after having been given notice of this Code, you are accepting the practices described in this Code, as they may be amended from time to time by us.

In support of this Privacy Code and our commitment to privacy, we have appointed a Chief Privacy Officer who is responsible for overseeing Hydro One's compliance with its obligations under PIPEDA. Each Hydro One employee, director and officer is responsible for protecting and handling personal information in accordance with the rules set forth under PIPEDA, our Privacy Code and in respect of our electricity distribution customers, our electricity distribution licence issued by the OEB and our Conditions of Service.

OUR DEFINITIONS

In order to assist you in understanding this Privacy Code, this Section provides you with definitions of key terms used throughout the Code.

“Conditions of Service” means Hydro One’s document that describes Hydro One’s operating practices and connection policies and sets out the terms and conditions upon which Hydro One offers, and our customers accept electricity distribution service from us. The Conditions of Service is available at [HydroOne.com/COS](https://www.hydroone.com/COS).

“Hydro One”, “we”, “us” and “our” means Hydro One Limited and its affiliates (including our licenced electricity distributors, Hydro One Networks Inc. and Hydro One Remote Communities Inc.)

“personal information” means any information about an identifiable individual. Personal information includes the following types of information:

- Name
- Mailing address
- Electricity service address
- Email address
- Telephone number
- Date of birth
- Credit history
- Payment history including past due amounts
- Driver’s license number
- Ethnic origin; and
- Social status.

Personal information does not include an individual’s business contact information nor information that has been aggregated or de-personalized, such that an individual’s information cannot be identified.

“you” and “your” means the individual who is a customer or potential customer or a vendor or other individual whose personal information is in our possession.



PURPOSES FOR WHICH WE COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION

Hydro One will identify the purposes for which it collects personal information at or before the time the information is collected, such as when you apply for electricity distribution service from us (for example, purposes may be identified on our forms, our contracts or by our agents when you are on the phone with our Customer Support Centre or by reference to this Privacy Code or our Conditions of Service).

Hydro One collects, uses and discloses personal information as authorized or required by applicable law (including PIPEDA and our OEB issued distribution licences) and for purposes such as:

1. To establish your identity (e.g., name, address, phone number, driver's licence number, etc.);
2. To establish and maintain responsible commercial relations and operations which includes authenticating customer identity, billing and payments and maintaining records of same;
3. To assess customer credit history to determine whether Hydro One requires a security deposit;
4. To help Hydro One verify creditworthiness, collect a debt or enforce an obligation owed by an individual and/or manage and assess Hydro One's financial risks;
5. To collect and process past due accounts which includes disclosing Personal Information to a debt collection agency and/or a credit reporting agency;
6. To contact you and respond to your enquiries and requests and/or to monitor and assess quality of service (for example, Hydro One may monitor and/or record telephone communications for quality assurance and training purposes);
7. To address and respond to issues related to the usage of critical power dependent medical equipment during an outage;
8. To understand your needs and eligibility for products and services;
9. To recommend particular products and services to meet your needs;
10. To develop, enhance, market, and notify customers about electricity products and services, events, causes and programs sponsored or provided by Hydro One;
11. To comply with legal and regulatory requirements;
12. To provide you with information about electricity, the electricity market and rates; and
13. To meet our conservation and demand management (CDM) mandate (for example, Hydro One may use your personal information to market, administer and/or implement CDM programs and products).

The above purposes for which we may collect, use and disclose your personal information, which are not exhaustive, are a necessary part of your relationship with Hydro One.

HOW WE COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION

HOW WE COLLECT YOUR PERSONAL INFORMATION

We primarily collect your personal information directly from you, when you enter your information or sign-up to receive our products and services. For example, we may collect personal information from you in person, at one of our offices, over the telephone or by corresponding with you via mail, email or the Internet when you visit the [HydroOne.com](https://www.hydroone.com) website.

In some cases, we may collect your personal information without your consent. This includes where we are required or permitted to do so by law.

Hydro One collects personal information primarily from you, but it may also collect personal information about you from other sources including credit bureaus or personal references (including employers). For example, when you purchase a home in our electricity distribution service territory, your lawyer may contact us and inform us about the sale and provide information about you for us to open an account for you.

Your consent may be express (provided in writing, verbally, or electronically by you or through an authorized representative) or implied, depending on the circumstances. For example, we may obtain your express consent by way of an application form, through a check box on our website or through one of our contact centre agents. By accepting electricity distribution and related services from us, your consent to the collection, use and disclosure of your personal information for the purposes of providing you with such distribution and related services and all other purposes described above and in our Conditions of Service is implied. In determining the form of consent to use, we take into account the sensitivity of the information and your reasonable expectations.

Your personal information may also be obtained from a third party that has obtained your consent for them to disclose your personal information to Hydro One and for Hydro One to collect your personal information from them directly. We may also collect your personal information from an authorized representative such as a legal guardian or person with power of attorney.

HOW WE LIMIT THE PERSONAL INFORMATION WE COLLECT

Hydro One will not collect personal information indiscriminately and will limit collection of personal information to that which is reasonable and necessary for the purposes outlined in this Privacy Code or as otherwise consented to by you, and as authorized or required by applicable law. This means we only collect what we require to fulfill our obligations and run our business.

HOW WE USE YOUR PERSONAL INFORMATION

Hydro One uses your personal information internally among staff members (for example, our customer care staff and our internal auditors) who need this information in order to perform their duties in fulfilling the purposes outlined in this Privacy Code, as authorized or required by applicable law, and where the use is necessary and proper in the discharge of Hydro One's business. Either before or when we collect personal information about you, we explain to you how we intend to use it and will use it only for those intended purposes.

If you are an electricity distribution customer, we explain how we use your personal information in Section 2.5B of our Conditions of Service.

We will obtain your consent if we wish to use your information for any other purpose than originally intended and before collecting information about you from third parties. If we wish to use your information for new purposes, we will notify you and obtain the appropriate consent before doing so.

USE OF COOKIES

Hydro One or a third party may use cookies to collect Personal Information on our websites, mobile applications and myAccount portal. These cookies are used to remember your location preferences, to authenticate your identity, to provide social media features, to provide advertising and to analyze our website traffic and help maintain our website, mobile application and myAccount portal.

To learn more about Hydro One's use of cookies and other third party technologies, see our [Cookie Policy](#).



HOW WE DISCLOSE YOUR PERSONAL INFORMATION

Hydro One discloses your personal information for the purposes for which it was collected. We will obtain your consent to use the same personal information for any new purpose. We may also disclose your personal information without your consent as required or permitted by law. For example, under our distribution licence, we may disclose your personal information to a third party without your consent where such information is required to be disclosed for billing, settlement or market operation purposes, law enforcement purposes or for the processing of past due accounts.

In some instances, if you are an electricity distribution customer, your personal information will be shared with third parties who provide:

- (i) services on our behalf (such as customer service, outage management, data storage, data cleansing, and conservation and demand management related services); and/or
- (ii) us with other types of services to help us deliver and/or improve the services we provide (for example, auditing services, data analysis, consumer risk assessments and consulting/advisory services).

These service providers are given only the information that is necessary for them to perform those services that Hydro One has contracted them to provide. In some cases, our service providers are located outside of Canada. While we make sure our contracts provide appropriate protection and obligate the service providers to comply with Canadian privacy laws, when our service provider is located outside of Canada, the foreign laws of the jurisdiction in which the service provider is located will apply to your personal information.

In order to measure performance and develop service improvements for our electricity distribution customers, Hydro One may disclose personal information to third parties who conduct surveys on Hydro One's behalf. The service providers are bound by contracts that contain strict confidentiality obligations to protect your personal information and use it for the sole purpose of conducting the survey.

Hydro One does not trade or sell your personal information.



HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION

Hydro One retains personal information only for as long as necessary to fulfill the purposes for which we collected it, to meet our legal and contractual obligations and/or as otherwise permitted or required by law. Hydro One disposes of your personal information safely and securely. We ensure that third parties who provide services on our behalf follow our retention and disposal practices and are prohibited from storing, analyzing or using your personal information for purposes other than to perform the services they have been contracted to provide.

HOW DO WE KEEP YOUR PERSONAL INFORMATION SAFE

Hydro One protects your personal information by using a number of safeguards appropriate to the sensitivity of the information, including:

ORGANIZATIONAL MEASURES

Hydro One uses organizational security measures such as the use of security clearances for purposes of granting access and user rights to your personal information, training staff on the appropriate handling and security of personal information, and implementing and monitoring security practices to ensure your personal information is safe from loss, misuse, unauthorized access or disclosure.

TECHNOLOGICAL MEASURES

Hydro One uses technological security measures such as passwords and encryption to protect your personal information. For example, we require you to create your own password for you to be able to use our *myAccount* portal. *We encourage you to keep your information safe by maintaining the confidentiality of your password and account on our myAccount service and notifying Hydro One immediately of any unauthorized use of your account, your password, or any other breach of security that you may discover.*

PHYSICAL MEASURES

Hydro One uses physical measures to physically secure your personal information. These measures may include keeping cabinets and offices that store personal information secure by using locked filing cabinets.

CONTRACTUAL MEASURES

Hydro One uses contractual clauses that require our service providers to protect personal information from loss, theft and unauthorized access, use, disclosure and otherwise use personal information in a manner that is consistent with our obligations under PIPEDA. For example, contracts with third parties include provisions that prohibit our service providers from storing, analyzing or using your information for purposes other than to perform the services they have been contracted to provide.

In some cases, our service providers may be located outside of Canada. While we make sure our contracts provide appropriate protection and obligate the service providers to comply with Canadian privacy laws, when our service provider is located outside of Canada, the foreign laws of the jurisdiction in which the service provider is located will apply to your information.

HOW WE KEEP YOUR PERSONAL INFORMATION ACCURATE

We make every effort to keep your information accurate and up-to-date, based on the information provided by you and to the extent updated information is relevant for the purpose for which it was originally collected. While we strive to do our best to base our decisions involving personal information on accurate information, we rely on you to disclose all material information and to inform us of any relevant changes to your personal information.

If you are an electricity distribution customer of Hydro One and wish to change your email address, phone number or billing address (where it differs from your premises connected to our distribution system), please contact us by phone at 1-888-664-9376. Please note that changing your email address or phone number in our *myAccount* portal will not automatically change your account information in our Customer Information System (CIS), so please contact us at the above-referenced number in addition to updating your information in our *myAccount* portal.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

We respect your right to request access to your personal information that we may have and to challenge the accuracy and completeness of your personal information that we have and request that it be amended as appropriate. You may do so by submitting a formal request to us in writing (via mail or email). We may charge a nominal fee for responding to any request and if so, give you notice in advance of any costs for processing your request.

Note: If you are an electricity distribution customer of Hydro One, please contact our contact centre directly at 1-888-664-9376 to access and correct your information or as identified above in “How We Keep Your Personal Information Accurate” to change your email address, phone number or billing address (where it differs from your premises connected to our distribution system).

If we deny your individual request for access to your personal information, we will advise you in writing of the reason for the refusal and the process for challenging our decision. Some examples of the reasons why we may not be able to provide you with access to your personal information include where:

- providing access would likely reveal personal information about a third party;
- the information cannot be disclosed for legal, security or commercial proprietary reasons; and/or
- the information is subject to solicitor-client or litigation privilege.

You may access Hydro One’s Access and Correction forms at HydroOne.com/Privacy.

If you wish to challenge our decision, you can contact the Privacy Commissioner’s Office at priv.gc.ca or call 1-800-282-1376.

YOUR PRIVACY CHOICES

Subject to certain legal and contractual restrictions and reasonable notice, you can choose to refuse or withdraw your consent to the collection, use or disclosure of your personal information at any time. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent (e.g. withdrawal of consent in some circumstances may prevent us from providing you with certain products or services for which your personal information is necessary) and we will record and respect your choices.

If you are an electricity distribution customer, you may choose not to have your information released by Hydro One to a service provider for survey purposes, by contacting 1-888-664-9376.

Any other questions regarding your privacy choices or concerns regarding Hydro One's privacy practices can be raised by contacting us.

QUESTIONS OR CONCERNS

If you are an electricity distribution customer and you have any questions, concerns or problems about privacy, your personal information, this Privacy Code or how a request for information was handled, please contact us using the information below:

✉ CustomerMasterDataEnquiries@HydroOne.com

☎ 1-888-664-9376

✉ Hydro One Networks Inc.
P.O. Box 5700 Markham, Ontario L3R 1C8

Contact Title: Director, Customer Care

If you are NOT an electricity distribution customer and you have any questions, concerns or problems about privacy, your personal information, this Privacy Code or how a request for information was handled, please contact us using the information below:

✉ privacyoffice@HydroOne.com

☎ 647-624-1523

✉ Hydro One Networks Inc.
Law Department
483 Bay Street, South Tower, 8th Floor
Toronto, Ontario M5G 2P5

Contact Title: Privacy Officer



UPDATES TO PRIVACY CODE

Any changes to our Privacy Code shall be acknowledged in this Privacy Code in a timely manner. We may add, modify or remove portions of this Privacy Code when we feel it is appropriate to do so. You may determine when this Privacy Code was last updated by referring to the date found below.

Last Updated: November 9, 2020

© Hydro One Limited 2020