



# HYDRO ONE INC.



# Hydro One Inc. – Privacy Code

## Introduction – Hydro One’s Commitment to Privacy

Protecting your privacy and the confidentiality of your Personal Information has always been a fundamental aspect to the way Hydro One does business. As the largest electricity delivery company in Ontario, the collection, use and disclosure of customers’ Personal Information is fundamental to our day-to-day business operations and as such, we strive to provide you with the best customer service while at the same time complying with our privacy obligations in the *Personal Information Protection and Electronic Documents Act* (federal legislation). This includes respecting your privacy and treating you fairly. This Privacy Code has been established to inform you about our practices and procedures concerning the collection, usage and disclosure of your Personal Information. It tells you the ways we ensure that your privacy and the confidentiality of your Personal Information are protected.

## Applicability of Privacy Code

In this Code, the references to “Hydro One”, “we”, “us” and “our” means Hydro One Inc. and its subsidiaries. The words “you” and “your” means the individual who is a customer or potential customer or a vendor or other person whose Personal Information is in our possession and control. “Personal Information” means any factual or subjective information, recorded or not, about an identifiable individual and this includes information in any form such as:

- Age, name, address, phone number, ID numbers, income, ethnic origin, or blood type
- Opinions, evaluations, comments, social status, or disciplinary actions
- Employee files, medical records.

Personal Information does not include the name, title, business address or telephone of an employee of an organization.

## Key Principles and Implementation

Our Code is based on the following 10 key principles of privacy which form part of the *Personal Information Protection and Electronic Documents Act* and which were established by the Canadian Standards Association's *Model Code for the Protection of Personal Information (CAN/CSA-Q830-96)*, which was published in March 1996 as a National Standard of Canada. Beneath each principle, we explain how we fulfill the principle.

### 1. Accountability:

***An organization is responsible for Personal Information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the principles herein.***

Each employee, director and officer of Hydro One is responsible for the Personal Information under his or her possession or custody, including information that has been transferred to a third party for processing. In addition to establishing this Code, we have appointed a Privacy Officer who is accountable for our compliance with this Code and the principles outlined herein.

### 2. Identifying Purposes:

***The purposes for which Personal Information is collected shall be identified by the organization at or before the time the information is collected.***

Either before or when we collect Personal Information about you, we will explain to you how we intend to use it. We will limit the information we collect to what we need for those purposes, and we will use it only for those purposes. We will obtain your consent if we wish to use your information for any other purpose and before collecting information from third parties. If information that has been collected is to be used for a purpose we did not previously explain to you, we will inform you of that new purpose before we use the information.

Hydro One collects Personal Information only for the following purposes:

- To establish and maintain responsible commercial relations and operations, including for purposes of billing and debt collection and for assessing customer credit history from time to time to determine whether Hydro One requires a security deposit;
- To understand your needs and eligibility for products and services;
- To recommend particular products and services to meet your needs;
- To develop, enhance, market or provide electricity products and services;
- To manage and develop Hydro One's businesses and operations;
- To meet legal and regulatory requirements; and
- To provide you with information about the electricity market and rates.

### **3. Consent:**

***The knowledge and consent of the individual are required for the collection, use, or disclosure of Personal Information, except where inappropriate.***

We will not collect, use or disclose to a third party your Personal Information without your consent, except where: (a) we are required or permitted to do so by law; or (b) such information could aid in an emergency where people's lives and/or safety may be at stake. In addition, we will not disclose your Personal Information to a third party without your consent except where such information is required to be disclosed for billing, settlement or market operation purposes or for the processing of past due accounts. We will use reasonable efforts to ensure that you are advised of the purposes for which the information will be used in a way that you can reasonably understand.

Consent may be expressed in writing or implied, depending on all the surrounding circumstances, including the purposes for which it is being collected and the sensitivity of the information. In some cases, you may provide consent verbally, electronically or through an authorized representative.

We cannot tie the provision of services or products to a requirement for consent to the collection, use or disclosure of Personal Information, except as necessary to fulfil an identified, legitimate purpose. We may obtain your consent, for example, by way of an application form or, where disclosure to third parties is contemplated, an opt-out check-off box (whereby failure to opt-out is presumed to constitute consent). In determining the form of consent to use, we will take into account the sensitivity of the information and your reasonable expectations.

You may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice and we will explain the implications of such withdrawal.

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

***The collection of Personal Information shall be limited to that which is necessary for the purposes identified by the organization.***

We shall limit the collection of Personal Information to that which is necessary for the purposes identified and we shall collect the information by fair and lawful means.

The type of information we usually collect and maintain in your customer file may include your:

- Name
- Mailing and local Address
- E-mail Address
- Telephone Number
- Date of Birth
- Credit History
- Transaction History
- Driver's Licence Number

Personal Information is information that refers to you specifically. With your consent, we may collect Personal Information from you in person, at one of our offices, over the telephone or by corresponding with you via mail or the Internet. The choice to provide us with your Personal Information is always yours.

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

***Personal Information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.***

Personal Information will be used and disclosed internally within Hydro One by and among staff members (for example, our customer care staff and our internal auditors) that need the information in the performance of their duties and where the use and disclosure is necessary and proper in the discharge of Hydro One's business.

Hydro One shall not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. We shall retain Personal Information only as long as necessary for the fulfillment of those purposes.

In some instances, Personal Information will be shared with third party service providers who perform services on Hydro One's behalf, such as customer service, outage management, data storage, data cleansing and the like. These third party service providers are given only the information necessary to perform those services that Hydro One has contracted them to provide. Additionally, they are prohibited from storing, analyzing or using that information for purposes other than the services they have been contracted to provide. Hydro One uses contractual means to require such service providers to protect Personal Information from loss, theft and 78 unauthorized access, use, disclosure and otherwise in a manner consistent with the privacy policy and practices established by Hydro One. In the event our service provider is located outside of Canada, the service provider is bound by, and Personal Information may be disclosed in accordance with, the laws of the jurisdiction in which the service provider is located.

In order to measure performance and develop service improvements, Hydro One may disclose Personal Information to third party service providers for the purpose of conducting surveys on Hydro One's behalf. The providers are bound by strict confidentiality contracts to use the information for the sole purpose of the survey. Customers may choose not to have their information released by Hydro One to a service provider for survey purposes, by contacting 1-888-664-9376.

Hydro One collects Personal Information primarily from its customers, but it may also collect Personal Information from other sources including credit bureaus, employers or personal references.

Hydro One does not trade or sell your Personal Information to others.

Hydro One will occasionally collect your Personal Information when you visit the [www.HydroOne.com](http://www.HydroOne.com) website. This information is collected, used and disclosed under the same circumstances and according to the same policies and procedures as information you provide to Hydro One in an off-line environment.

## **6. Accuracy:**

***Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.***

Hydro One will ensure that Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it was obtained. While we will do our best to base our decisions involving Personal Information on accurate information, we rely on individuals to disclose all material information and to inform us of any relevant changes to their Personal Information.

We will make reasonable efforts to keep your information accurate and up-to-date, based upon satisfactory evidence provided by you and to the extent updated information is relevant for the purpose for which it was originally collected. We encourage you to review and confirm the accuracy of information provided. If you find any errors in any such information, we urge you to immediately contact us (by phone, fax, mail or e-mail) and we will make the appropriate corrections immediately, upon receipt of appropriate evidence.

## **7. Safeguards:**

***Personal Information shall be protected by security safeguards appropriate to the sensitivity of the information.***

Hydro One will protect Personal Information by using security safeguards appropriate to the sensitivity of the information. We audit our procedures and security measures regularly to ensure that they are being properly administered and that they remain effective and appropriate.

Hydro One shall protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. The nature of the safeguards will vary depending on the sensitivity of the information that has been collected, the amount, distribution and format of the information, and the method of storage.

Hydro One protects all Personal Information regardless of the format in which it is held. The methods of protection include:

- (i) physical measures, such as locked filing cabinets and restricted access to cabinets and offices;
- (ii) organizational measures, such as security clearances and limited access on a “need to know” basis;
- (iii) technological measures, such as the use of passwords and encryption.

## **8. Openness:**

***An organization shall make readily available to individuals specific information about its policies and practices relating to the management of Personal Information.***

We have prepared this plain-language Privacy Code to make you aware of our policies and procedures relating to the management of Personal Information. It is available to the public online at [www.HydroOne.com](http://www.HydroOne.com).

## **9. Individual Access:**

***Upon request, an individual shall be informed of the existence, use, and disclosure of his or her Personal Information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.***

We will give you access to the Personal Information we retain about you within a reasonable time, with a written request and satisfactory identification. You also have the right to know of the existence, use, and disclosure of your Personal Information. We may charge a nominal fee for responding to any request and if so, we will give you notice in advance of costs for processing your request.

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 you may then challenge our decision. Some examples of the reasons why we may not be able to provide you with access to your Personal Information include:

- (i) where providing access would be likely to reveal Personal Information about a third party;
- (ii) where the information cannot be disclosed for legal, security or commercial proprietary reasons; or
- (iii) where the information is subject to solicitor-client or litigation privilege.

**10. Challenging Compliance:**

*An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.*

You may address a challenge concerning compliance with the above principles as outlined in the Section below entitled "Questions or Concerns".

### **Customer Choice**

In most cases, you are free to refuse or withdraw your consent to the collection, use or release of your Personal Information at any time by contacting us as specified in the Questions or Concerns section below. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent and we will record and respect your choices.

### **Questions or Concerns**

If you have any questions, concerns or problems about privacy, your Personal Information, this Code or how a request for information was handled, please contact us using the information below:

**E-mail:** [privacy@hydroone.com](mailto:privacy@hydroone.com)

**Phone:** 1-888-664-9376

**Mail:** Hydro One Networks Inc.  
P.O. Box 5700  
Markham, Ontario  
L3R 1C8

**Imran Merali, Director  
Customer Care**

We will investigate and work hard to respond to your concerns and provide an acceptable solution.

### **Updates to Privacy Code**

Any changes to our Privacy Code and information handling practices and procedures shall be acknowledged in this Privacy Code in a timely manner. We may add, modify or remove portions of this Code when we feel it is appropriate to do so. You may determine when this Code was last updated by referring to the modification date found on the version of the Code available at [www.HydroOne.com](http://www.HydroOne.com).