

Burlington Hydro Electric Inc.

Privacy Policy

Preface

Burlington Hydro Electric Inc. and its affiliates (Burlington Hydro Inc. and Burlington Electricity Services 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, customers, subcontractors and customers of Burlington Hydro Electric Inc. 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 Burlington Hydro Electric 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 10 principles for the protection of personal information, as devised by the Canadian Standards Association (CSA).

This Privacy Code does not apply to information about business customers who carry on business as corporations, partnerships or other forms of association. Burlington Hydro Electric Inc. does, however, protect the confidentiality of such information in accordance with the law and our own policies.

Personal Information Protection Principles

1. Accountability

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

Our Privacy Officer, has overall responsibility for our protection of personal information and for Burlington Hydro Electric Inc.'s compliance with this Privacy Policy.

2. Identifying Purposes

Burlington Hydro Electric Inc. will not collect, use or disclose to a third party your personally identifiable information without your consent, except where (a) such information could contribute to a legal investigation, or (b) such information could aid in an emergency where people's lives and safety may be at stake. Personal information that Burlington Hydro Electric Inc. collects from customers includes, but is not limited to: Name, Address; Postal Code; Phone Number; Owner/Tenant; Occupancy Date; e-mail address; Work Phone Number; and specific instructions that are voluntarily provided by our customer(s).

When an individual applies for service, Burlington Hydro Electric Inc. will make the individual aware of the purposes for which Burlington Hydro Electric Inc. is requesting the personal information. If Burlington Hydro Electric Inc. identifies other purposes for which the personal information may be used, Burlington Hydro Electric Inc. will seek the individual's consent prior to such use. Burlington Hydro

Electric Inc. will advise that it is the individual's right to refuse permission for Burlington Hydro Electric 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 Burlington Hydro Electric Inc. will collect personal information for the following purposes:

- For billing, settlement and market operation
- For law enforcement purposes
- For the purposes of complying with legal requirements
- For processing of past due accounts which have been referred to a debt collection agency.
- Energy sector legal, regulatory and settlement requirements

3. Consent

Burlington Hydro Electric 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. Burlington Hydro Electric 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 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 Burlington Hydro Electric Inc. 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

Burlington Hydro Electric Inc. limits the amount and type of personal information it collects to that which is necessary for the business. Each affiliate of Burlington Hydro Electric Inc. will be responsible for its own collection, use and disclosure of information. Personal Information will be collected using procedures which are fair, transparent and lawful.

5. Limiting Use, Disclosure and Retention

Burlington Hydro Electric 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. Burlington Hydro Electric Inc. will not exchange any information among its affiliated companies, except for billing and settlement purposes. Burlington Hydro Electric 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, Burlington Hydro Electric 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 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, Burlington Hydro Electric Inc. 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 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

Burlington Hydro Electric Inc. will make its policies and practices relating to the protection of personal information available to its customers. Burlington Hydro Electric Inc. will keep its customers informed of these policies and practices and customers shall be provided access to all related policies and procedures via Burlington Hydro Electric 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 Burlington Hydro Electric Inc. can have access to the personal information about them that Burlington Hydro Electric Inc. 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 **(905) 332-1851 ext. 600**, via email **privacy@burlingtonhydro.com** or in writing 1340 Brant Street, Burlington, Ontario L7R 3Z7. Response to an individual's request will be made in a timely and efficient manner.

10. Challenging Compliance

Any customer of Burlington Hydro Electric Inc. may challenge Burlington Hydro Electric Inc.'s compliance with this Privacy Policy by contacting Burlington Hydro Electric Inc. directly. Burlington Hydro Electric Inc. has policies and procedures to receive, investigate and respond to individual complaints and questions. If the customer is not satisfied with the way Burlington Hydro Electric Inc. has responded to a complaint, the customer can contact the Privacy Commissioner of Canada.

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