

PETERBOROUGH UTILITIES GROUP

PRIVACY POLICY

Reference File: H00

POLICY

Peterborough Utilities Group (PUG) is committed to keeping the personal information of its customers accurate, confidential, secure and private. Our Policy has been designed to inform employees, customers and contractors of PUG's commitment and recognition of our obligation to meet the spirit and terms of the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

PURPOSE

Our Privacy Policy describes the principles by which PUG 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 to this information, as devised by the Canadian Standards Act.

The Privacy Policy does not apply to information about business customers who carry on business as corporations, partnerships or other forms of association. PUG does, however, protect the confidentiality of such information in accordance with the law and its own policies.

APPLICATION

Personal Information Protection Principles

1. Accountability

PUG is accountable for all personal information within the organization's possession or control, including any personal information that has been transferred to a third party for regulatory or legal purposes. PUG will require a comparable level of protection of this information from its third party relationships.

A Privacy Officer has been appointed, and is responsible to oversee compliance with PUG Privacy Policy. PUG shall provide, upon request, the name and contact information of the Privacy Officer.

2. Identifying Purposes

PUG collects personal information only for the following purposes:

- a) to establish and maintain responsible commercial relationships with clients, customers and to provide ongoing service; and
- b) to meet all of its legal and regulatory requirements.

Personal information that PUG collects from customers includes:

- a) the customer's name and address and other contact information, such as telephone numbers, email address;
- b) the meter number;
- c) facts about consumption of power, both historic and current;
- d) information about a customer's transactions with us, such as account numbers, account balances, payment history;
- e) credit and reference information, such as date of birth, employment information, driver's licence, previous addresses, and general financial information;
- f) medical information to be used in case of emergency power outages; and
- g) bank information for pre-authorized payments.

3. Consent

PUG will obtain an individual's consent for use and disclosure of personal information before or when it collects, uses or discloses personal information. PUG will not disclose personal information without an individual's consent only in circumstances as permitted by law.

Subject to legal or contractual restrictions, and reasonable notice, an individual may refuse or withdraw consent for shared access to their personal information at any time. Customers may contact PUG for more information regarding the withdrawal of consent and any implications of such withdrawal.

4. Limiting Collection

PUG shall limit the amount and type of personal information it collects to that which is necessary for the purposes identified by the Company. PUG shall collect personal information using procedures which are fair, transparent and lawful.

5. Limiting Use, Disclosure and Retention

PUG shall not use or disclose personal information for purposes other than those for which it was collected, unless consent is given by the individual to use or disclose it for another purpose or as required by law.

If PUG uses personal information for a new purpose, it will document this purpose.

With the consent of the customer, PUG may disclose a customer's personal information to the following;

- a) an agent retained by PUG in connection with the collection of the customer's account;
- b) credit grantors and reporting agencies;
- c) a person who, in the reasonable judgment of PUG, is seeking the information as an agent of the customer; and
- d) any other third party or parties, where the customer has provided consent to such disclosure or disclosure as required by law.

PUG shall maintain reasonable and systematic controls, schedules and practices for the protection of personal information. Record retention, which shall include minimum and maximum retention periods, and destruction shall apply to personal information.

PUG will keep personal information only as long as necessary for the identified purposes.

Only those employees of PUG who require access for business reasons or whose duties reasonably so require, are granted access to personal information about customers.

6. Accuracy

PUG will keep the personal information in its possession or control accurate, complete current and relevant based on the most recent information provided to PUG.

Personal information used by PUG shall be sufficiently accurate, complete, current and relevant to minimize the possibility that inappropriate information may be used to make a decision about a customer.

PUG shall update personal information about customers only if it is necessary for the purposes for which it was collected or upon notification by the individual requesting that their personal information be updated or amended.

7. Safeguards

PUG shall protect personal information with security safeguards appropriate to the sensitivity of the information.

PUG shall protect personal information from loss or theft, unauthorized access, disclosure, copying, use, modification or destruction through appropriate security measures. PUG shall protect all personal information regardless of the format in which it is held.

The nature of the safeguards will vary depending on the sensitivity of the information, amount, distribution, format and the method of storage of the personal information. PUG will give the highest level of protection to the most sensitive personal information.

The methods of protection will include:

- a) Physical security, such as locked filing cabinets and restricted access to offices;
- b) Organizational security, such as security clearances and limiting access on a “need to know” basis; and
- c) Technological security, such as, the use of passwords and encryption.

8. Openness

PUG shall make readily available to customers specific information about its policies and practices relating to the management of personal information.

PUG may make information on its privacy policies and practices available in a variety of ways, including brochures at its place of business, PUG’s web page and bill inserts.

9. Individual Access

Upon request, an individual can have access to the personal information about them that PUG has in its possession or control.

Any customer may request their personal information be amended for purposes of accuracy and completeness.

Customers can make their requests by telephone (705) 748-9300, via email privacyofficer@peterboroughutilities.ca or in writing 1867 Ashburnham Drive, PO Box 4125, Peterborough, Ontario K9J 6Z5. Response to an individual’s request will be made in a timely and efficient manner.

10. Challenging Compliance

Any customer of PUG may challenge PUG’s compliance with this Privacy Policy by contacting PUG directly.

PUG shall maintain procedures for receiving, addressing and responding to all inquiries or complaints from its customers relating to its handling of personal information.

PUG shall investigate all complaints concerning compliance with the PUG 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 privacy policies and procedures. A customer shall be informed of the outcome of the investigation regarding his or her complaint in a timely manner.

If individuals are not satisfied with the way PUG has responded to their complaint, they can contact the Privacy Commissioner of Canada at (613) 995-8210.

Approved: May 6, 2010

Reviewed: