

Privacy Policy Statement

Preface

Innisfil Hydro Distribution Systems Limited (Innisfil Hydro) 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 Innisfil Hydro 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 Innisfil Hydro 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. Innisfil Hydro does, however, protect the confidentiality of such information in accordance with the law and our own policies.

Personal Information Protection Principles

1. Accountability

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

Barb Cesarin, our Privacy Officer, has overall responsibility for our protection of personal information and for Innisfil Hydro's compliance with this Privacy Policy.

2. Identifying Purposes

Personal information that Innisfil Hydro collects from customers includes name, address, driver's license number, social insurance number, date of birth, banking information (if customer chooses payment options that requires that we need this information), employer, previous address, credit information.

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

it is the individual's right to refuse permission for Innisfil Hydro 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, Innisfil Hydro will collect personal information for the following purposes:

- To provide you with continuous electric service and to bill you for that service;
- To assist us in the collection of accounts;
- To respond to your inquiries about energy use and billing;
- To prevent fraud with respect to both you and our company;
- Energy sector legal, regulatory and settlement requirements.

3. Consent

Innisfil Hydro 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. Innisfil Hydro 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. Should you wish to withdraw your consent to our collection, use or disclosure of your personal information, please call, e-mail or write us to obtain further direction. Please note, however, that the withdrawal of consent to the continued use of certain personal information may prevent us from continuing to provide you with some services, and a certain minimum amount of personal information is required in order to continue to provide electric distribution services.

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 Innisfil Hydro 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

Innisfil Hydro limits the amount and type of personal information it collects to that which is necessary for the business of the utility. The affiliate of Innisfil Hydro (Innisfil Energy Services Limited) 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

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

Innisfil Hydro will make its policies and practices relating to the protection of personal information available to its customers. Innisfil Hydro will keep its customers informed of these policies and practices and customers shall be provided access to all related policies and procedures via Innisfil Hydro'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 Innisfil Hydro can have access to the personal information about them that Innisfil Hydro 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 **705-431-4321**, via email [cs@innisfilhydro.com] or in writing to **2073 Commerce Park Drive, Innisfil ON L9S 4A2**. Response to an individual's request will be made in a timely and efficient manner.

10. Challenging Compliance

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