

## **Privacy Notice to Customers of Centre Wellington Hydro Ltd.**

Centre Wellington Hydro Ltd. (CWHydro) is pleased to be your local electricity distributor. Providing you with a reliable source of electricity requires that CWHydro collect and keep certain personal information about you. We are committed to protecting the privacy of your personal information and we have developed policies and procedures in compliance with the Personal Information Protection and Electronic Documents Act.

We would like to take this opportunity to inform you about the personal information that we collect, how it is used, how we protect its confidentiality and your rights in respect of this information.

### ***What personal information is collected?***

*The nature of personal information we collect may include:*

- Information we receive from you such as your name, address, contact information and general financial, credit and reference information
- Facts about your historical and current consumption of power and water
- Information about your transaction with us, such as meter number, account number, account balances, payment history, and account activity
- Identifying information, such as a driver's licence number

### ***How is my personal information used by CWHydro?***

*CWHydro uses the information we collect for the following purposes:*

- To provide you with electric and/or water services and to bill you for those services
- To assist us in the collection of accounts
- To respond to your inquiries about energy and water use and billing
- To conduct customer service surveys
- To prevent fraud with respect to both you and our company
- To meet legal and regulatory requirements

Because of the structure of the electricity sector in Ontario, it may be necessary to share your billing and consumption information with third party billing and settlement agencies. For example, if you have signed a contract with a retailer, then we may provide your billing and consumption information as required by law or regulation. Our billing, settlement and regulatory relationships with third parties are governed by licences and codes established by the Ontario Energy Board.

### ***How is my personal information protected?***

We recognize that your information is private. We have developed a Corporate Privacy Policy for Centre Wellington Hydro Ltd. that governs the collection, use and protection of personal information. You can access our Privacy Policy on our corporate web site [[www.cwhydro.ca](http://www.cwhydro.ca)] or you can call us at 843-2900 to request that a copy of this policy be sent to you. Our Privacy

Policy came into effect on January 1, 2004 and may be updated periodically. Any change to our Privacy Policy will be posted on our website and, if the change is major, an additional notice will be sent to you.

***What rights do I have to access my personal information?***

You have the right to request access to the personal information that we have collected and to request amendments to personal information about you to ensure its accuracy and completeness. To make a request for access to personal information we have collected, disclosed or used, or to request that your personal information be amended, please contact our office.

***What do I do if I have concerns?***

We want to ensure that you understand our need to collect and use personal information in the delivery of our electricity services. Please feel free to call us at 843-2900 if you have concerns about the collection and use of your personal information by CWHydro. You may also call this number if you wish to withdraw your consent to our collection, use or disclosure of your personal information. We can also be contacted via email at [enquiries@cwhydro.ca](mailto:enquiries@cwhydro.ca) or if you write to us at the address shown below, we will respond to any questions or concerns you may have.

CWHydro is committed to being the responsible and reliable electrical distributor that you expect. This commitment includes the protection of our customers' personal information. Thank you for your continued support.

Yours sincerely

Doug Sherwood  
President/Secretary  
Centre Wellington Hydro

## **Privacy Policy Statement**

### **Preface**

CWHydro is committed to keeping the personal information of its customers accurate, confidential, secure and private. This Privacy Policy has been designed to inform customers, employees, suppliers, and subcontractors of CWHydro of our commitment and recognition of our obligation to meet the spirit and terms of the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

### **Contents**

This Privacy Policy describes the principles CWHydro will use to protect 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. This 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. CWHydro does, however, protect the confidentiality of such information in accordance with the law and our own policies.

### **Personal Information Protection Principles**

#### **1. Accountability**

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

#### **2. Identifying Purposes**

Personal information that CWHydro collects from customers includes: the customer's name and address and other contact information; the meter number; facts about consumption of power and water, both historic and current; facts about payment history, including general financial information; credit and reference information, such as date of birth, employment information, driver's licence, previous addresses, telephone numbers, e-mail address, medical information to be used in case of emergency power outages, and bank information requested for pre-authorized payments.

When an individual applies for service, CWHydro will make the individual aware of the purposes for which CWHydro is requesting the personal information. If CWHydro identifies other purposes for which the personal information may be used, CWHydro will seek the individual's consent prior to such use. CWHydro will advise that it is the individual's right to refuse permission for CWHydro 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, CWHydro will collect personal information for the following purposes:

- Billing and collection of payments
- Pre-authorized payment for services
- Priority restoration of electric service to the correct address and meter, as may be required by medical circumstances
- Energy and water sector legal, regulatory and settlement requirements
- Conducting customer surveys including customer satisfaction surveys

### **3. Consent**

CWHydro 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. CWHydro 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 reduce or withdraw their consent to the collection, use or disclosure of personal information about them at any time. Should a customer withdraw consent, other forms of security, including but not limited to security deposits, may be required.

All existing customers will be informed of the types of personal information that have been collected, the purpose for the collection and the procedures available for contacting CWHydro with any inquires. All new customers will be provided with a verbal and/or written explanation about the collection, use and disclosure of personal information when requesting service. CWHydro will obtain verbal and/or written consent before it collects personal information from all new customers.

### **4. Limiting Collection**

CWHydro limits the amount and type of personal information it collects to that which is necessary for the business of the utility. Each affiliate of CWHydro 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**

CWHydro 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. In accordance with the *Affiliate Relationship Code*, created under the provincial *Electricity Act*, no customer information will be disclosed by one affiliate to another.

CWHydro will develop explicit retention periods for closed accounts (zero balance), after which the personal information is destroyed or made anonymous. Under certain exceptional circumstances, CWHydro 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, CWHydro 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, 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**

CWHydro will develop and make available to its customers policies and practices relating to the protection of personal information. CWHydro will keep its customers informed of these policies and practices via CWHydro’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 CWHydro can have access to the personal information about them that CWHydro 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 (519 843-2900, via email ([enquiries@cwhydro.ca](mailto:enquiries@cwhydro.ca)) or in writing ( P.O. Box 217, Fergus, Ontario, N1M 2W8). Response to an individual’s request will be made in a timely and efficient manner.

10. **Challenging Compliance**

Any customer of CWHydro may challenge CWHydro’s compliance with this Privacy Policy by contacting CWHydro directly. If the customer is not satisfied with the way CWHydro has responded to a complaint, the customer can contact the Privacy Commissioner of Canada.