



**Policy No. AD18-EC**

**Privacy Policy Statement**

**for**

**Elexicon Corporation, Elexicon Energy Inc., and Elexicon Group Inc.**

**Approved by Elexicon Executive Leadership Team: 12-Sep-2019**

**Policy Owner: Corporate Secretary**

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### **Revision History**

<b>Policy Issue Date</b>	<b>List of Changes or Reason for Issue</b>	<b>Policy Version #</b>
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### **Review Schedule**

Every three years.

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## 1.0 Preface

The group of Elexicon companies (Elexicon Corporation, Elexicon Energy Inc. and Elexicon Group 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 contractors of Elexicon of our commitment and obligation to meet the spirit and terms of the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

## 2.0 Contents

Our Privacy Policy describes the principles by which Elexicon 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 Policy does not apply to information about business customers who carry on business as corporations, partnerships or other forms of association. Elexicon does, however, protect the confidentiality of such information in accordance with the law and our own policies.

## 3.0 Personal Information Protection Principles

### 3.1 Accountability

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

As Privacy Officer, Elexicon's Corporate Secretary has overall responsibility for the protection of personal information and for Elexicon's compliance with this Privacy Policy.

### 3.2 Identifying Purposes

Personal information that Elexicon collects from customers includes:

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

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

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

### **3.3 Consent**

Elexicon 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. Elexicon 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 Elexicon 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.

### **3.4 Limiting Collection**

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

### **3.5 Limiting Use, Disclosure and Retention**

Elexicon will only use the personal information for the purpose for which it was collected as identified in principle 3.2, unless consent is given by the individual to use or disclose it for another purpose. Elexicon will maintain explicit retention periods for closed accounts, after which the personal information will be destroyed or made anonymous.

Under certain exceptional circumstances, Elexicon may have a legal duty or right to disclose personal information without the individual's knowledge or consent.

### **3.6 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.

### **3.7 Safeguards**

In executing its responsibilities with respect to the confidentiality of personal information, Elexicon 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 (i.e. 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.

### **3.8 Openness**

Elexicon will make its policies and practices relating to the protection of personal information available to its customers. Elexicon will keep its customers informed of these policies and practices and customers shall be provided access to all related policies and procedures via Elexicon’s web page and bill inserts. The information will be available in a format that is easy to understand.

### **3.9 Individual Access**

Any customer of Elexicon can have access to the personal information about them that Elexicon 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 [1-888-420-0070], via email [service@Elexicon.on.ca] or in writing [55 Taunton Road East, Ajax, Ontario, L1T 3V3]. Response to an individual’s request will be made in a timely and efficient manner.

### **3.10 Challenging Compliance**

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