

> Privacy Policy

This Privacy Policy describes the principles Hydro Ottawa will use to protect the privacy of Personal Information of customers and other individuals in its possession or control. By accepting services from Hydro Ottawa, visiting our Website, or otherwise providing us with your Personal Information, you are accepting the practices described in this Privacy Policy. The terms in this Privacy Policy may be changed from time to time, so you should review it for changes periodically.

Hydro Ottawa is committed to keeping Personal Information it collects in accordance with our obligations to meet the terms of applicable privacy laws including the *Personal Information Protection and Electronic Documents Act* (Canada) (PIPEDA), the *Municipal Freedom of Information and Protection of Privacy Act* (Ontario) (MFIPPA), and conditions of the Ontario Energy Board issued Electricity Distribution License for Hydro Ottawa Limited (Distribution License).

This Privacy Policy incorporates the 10 principles for the protection of Personal Information, as established by the Canadian Standard Association (CSA) and as adopted and amended by PIPEDA.

Personal information is information about an identified or identifiable individual. Personal information may include such information as your name, email address, mailing address, financial information, birth date and other information about you collected electronically, in person or by telephone.

Personal Information does not include the name, title or business address or telephone number of an employee of an organization. Personal information does not include information that has been aggregated such that an individual's information cannot be identified.

In this Privacy Policy, "Hydro Ottawa", "we", "us", or "our" means Hydro Ottawa Holding Inc. and its wholly-owned affiliates, including Hydro Ottawa Limited and Energy Ottawa Inc., and "customer", "you", and "your" means the individual who is a customer, prospective customer, vendor or other individual member of the public whose Personal Information is in our possession or control. This Privacy Policy does not apply to information about business customers who carry on business as corporations, partnerships or other forms of association. Hydro Ottawa does, however, protect the confidentiality of such information in accordance with the law, including regulatory codes of conduct issued by the Ontario Energy Board, and contractual arrangements.

The following are 10 principles that Hydro Ottawa follows for the protection of Personal Information:

1. **Accountability**
2. **Identifying Purposes**
3. **Consent**
4. **Limited Collection**
5. **Limited Use, Disclosure, and Retention**
6. **Accuracy**
7. **Safeguards**
8. **Openness**
9. **Individual Access**
10. **Challenging Compliance**

> 1. Accountability

Hydro Ottawa is accountable for the protection of Personal Information within the organization's possession or control including all Personal Information held by us or transferred to a third party for processing.

If you have questions or concerns regarding your Personal Information or this Privacy Policy please address them to:

Hydro Ottawa Holding Inc.
PO Box 8700,
Ottawa, Ontario K1G 3S4

Attention: General Counsel
Email: privacy@hydroottawa.com

> 2. Identifying Purposes

Hydro Ottawa shall identify the reasons for collecting Personal Information before or at the time of collection. Upon request, persons collecting Personal Information shall explain these identified purposes or refer the individual to a designated person within Hydro Ottawa who shall explain the purposes.

Unless required by law, Hydro Ottawa shall not use or disclose, for any new purpose, Personal Information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the customer.

All Personal Information that Hydro Ottawa collects is collected for the following purpose:

- To establish, deliver and maintain electricity services;
- To identify our customers, respond to customer inquiries and otherwise maintain a responsible business relationship with customers;
- To bill and collect payment;
- For pre-authorized payments;
- To perform credit reviews to determine creditworthiness;
- To determine eligibility for products and services;

- To recommend particular products and services to meet customer needs;
- To develop, enhance, promote or provide Hydro Ottawa products and services;
- To provide customers with information about the electricity industry, rates and energy conservation programs such as programs that allow you to benchmark your energy consumption against other customer groups;
- To notify customers about new and existing programs, events, causes or any other matters sponsored by Hydro Ottawa;
- To manage and develop Hydro Ottawa business land operations; and
- To meet legal and regulatory requirements.

> 3. Consent

In obtaining consent, Hydro Ottawa shall use reasonable efforts to ensure that a customer is advised of the identified purposes for which Personal Information will be used or disclosed. Purposes shall be stated in a manner that can be reasonably understood by the customer.

Generally, Hydro Ottawa shall seek consent to use and disclose Personal Information at the same time it collects the information. However, Hydro Ottawa may seek consent to use and disclose Personal Information after it has been collected but before it is used or disclosed for a new purpose.

Hydro Ottawa will require customers to consent to the collection, use or disclosure of Personal Information as a condition of the supply of a product or service only if such collection, use or disclosure is required to fulfill the identified purposes.

In determining the appropriate form of consent, Hydro Ottawa shall take into account the sensitivity of the Personal Information and the reasonable expectations of its customers.

In general, the use of products and services by a customer constitutes implied consent for Hydro Ottawa to collect, use and disclose Personal Information for all identified purposes.

A customer may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Customers may contact Hydro Ottawa for more information regarding the implications of withdrawing consent.

> 4. Limited Collection

Hydro Ottawa collects Personal Information primarily from their customers. Hydro Ottawa will not, as a condition of supplying you with a product or service, require you to consent to the collection of Personal Information beyond that required to fulfill the specified, legitimate purpose.

Hydro Ottawa may also collect Personal Information from other sources including credit bureaus, employers or personal references, or other third parties that represent that they have the right to disclose the information.

> 5. Limited Use, Disclosure, and Retention

Hydro Ottawa may also use or disclose Personal Information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened. Hydro Ottawa may disclose Personal Information without knowledge or consent to a lawyer representing the companies, to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required by law.

Only those employees of Hydro Ottawa who require access for business reasons, or whose duties reasonably so require, are granted access to Personal Information about customers.

Due to 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, such as where you have signed a separate contract with a retailer. Our billing, settlement and regulatory relationships with third parties are governed by our license and regulatory codes that are established by the Ontario Energy Board.

Hydro Ottawa may engage employees, contractors or other companies and third parties to perform services for Hydro Ottawa that involve access to Personal Information. These third parties may be located outside of Ontario or Canada.

In accordance with the Distribution License, Hydro Ottawa will not disclose any consumer information (which may include Personal Information) to any of its affiliates without the consumer's written consent except where consumer information is required to be disclosed:

- (a) for billing or market operation purposes;
- (b) for law enforcement purposes; or
- (c) for the purpose of complying with a legal requirement.

Hydro Ottawa shall keep Personal Information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where Personal Information has been used to make a decision about a customer, Hydro Ottawa shall retain, for a period of time that is reasonably sufficient to allow for access by the customer, either the actual information or the rationale for making the decision.

Hydro Ottawa shall maintain reasonable controls and practices for information and records retention and destruction which apply to Personal Information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

> 6. Accuracy

Personal information used by Hydro Ottawa shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a customer. Hydro Ottawa shall update Personal Information about customers as and when necessary to fulfill the identified purposes or upon notification by the individual.

> 7. Safeguards

Hydro Ottawa shall protect Personal Information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures. Hydro Ottawa shall protect the information regardless of the format in which it is held.

Hydro Ottawa shall protect Personal Information disclosed to third parties by communicating the confidentiality of the information, the purposes for which it is to be used, limits on the number of persons whose job function requires access to the information, and the physical and procedural security measures required to safeguard that information.

All employees of Hydro Ottawa with access to Personal Information shall be required as a condition of employment to respect the confidentiality of Personal Information.

> 8. Openness

Hydro Ottawa is committed to making information about this policy easy to understand, accessible and updated. Hydro Ottawa will make changes to its Privacy Policy from time to time and such changes will be posted on the website, and by bill inserts if appropriate.

> 9. Individual Access

Upon request, customers may obtain information regarding the type, use and disclosure of his, or her, Personal Information that Hydro Ottawa has in its possession and control. Hydro Ottawa may require that a customer provide satisfactory proof of identity prior to obtaining access to his or her Personal Information. Hydro Ottawa may charge a nominal fee for responding to such request. Hydro Ottawa may refuse to provide you with access to your Personal Information where such refusal is permitted or required by law or regulatory authorities.

> 10. Challenging compliance

Any customer may challenge Hydro Ottawa's compliance with this Privacy Policy by contacting the contact information set out above under the heading "Accountability".

Hydro Ottawa shall investigate all complaints concerning compliance with this 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 policies and procedures. A customer shall be informed of the outcome of the investigation regarding his or her complaint.

> Website Analysis Tools and the Collection of Personal Information:

In addition to the 10 principles highlighted above, Hydro Ottawa's website, online services, interactive applications, email messages, and advertisements may use "cookies" and other analytical technologies. These technologies help Hydro Ottawa measure performance and engagement. The purpose of collection of Personal Information by these technologies will be consistent with the purposes stated above under the heading "Identifying Purposes".

For example, "cookies" may be associated with Hydro Ottawa's online forms that customers may wish to submit on a regular basis. Our goal is to make your experience with Hydro Ottawa more convenient and personal. Customers are free to prevent the installation of cookies by simply disabling this feature in your browser option.