

# Privacy Statement for Atikokan Hydro Inc.

effective January 1, 2004 Re-affirmed 2014

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

This Privacy Policy describes the principles Atikokan Hydro Inc. 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 it's confidentially protected and outlines customers' rights with respect to 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. Atikokan Hydro Inc. does, however, protect the confidentiality of such information in accordance with the law and our own policies.

Wilf Thorburn  
CEO / Sec. / Treas

## Personal Information Protection Principles:

### 1. Accountability

Atikokan Hydro Inc. 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. Atikokan Hydro Inc. will require a comparable level of protection of this information from its third party relations. Mr. Wilf Thorburn, CEO / Sec / Treas, is designated as Atikokan Hydro Inc.'s Chief Privacy Officer, and has overall responsibility for our protection of personal information and for Atikokan Hydro Inc.'s compliance with this Privacy Policy.

### 2. Identifying Purposes

Personal information that Atikokan Hydro Inc. collects from customers includes: the customer's name and address and other contact information; the meter number; facts about consumption of power, both historic and current; facts about payment for electric service, including general financial information; credit and reference information, such as date of birth, employment information, drivers licence, previous addresses, telephone numbers, e-mail addresses, and bank information requested for pre-authorized payments.

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

- Billing and collection of payments for electric service
- Pre-authorized payment for services
- Energy sector legal, regulatory and settlement requirements

### 3. Consent

Atikokan Hydro Inc. 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. Atikokan Hydro Inc. 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 Atikokan Hydro Inc. 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

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

Atikokan Hydro Inc. 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 Affiliates Relationship Code, created under the provincial Electricity Act, no customer information will be disclosed by one affiliate to another.

Atikokan Hydro Inc. 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, Atikokan Hydro Inc. 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, Atikokan Hydro Inc. 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, 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

Atikokan Hydro Inc. will make its policies and practices relating to the protection of personal information available to its customers. Atikokan Hydro Inc. will keep its customers informed of these policies and practices and customers shall be provided access to all related policies and procedures via Atikokan Hydro Inc.'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 Atikokan Hydro Inc. can have access to the personal information about them that Atikokan Hydro Inc. 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, via e-mail, or in writing. Contact information is provided under point #10, page four. Response to an individual's request will be made in a timely and efficient manner.

#### 10. Challenging Compliance

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

Contact Information for Atikokan Hydro Inc.'s Chief Privacy Officer:

Mr. Wilf Thorburn, CEO / Sec. Treas

Atikokan Hydro Inc.

Phone 807-597-6600

Cell 807-597-8081

Fax 807-597-6966

Email: [wilf.thorburn@athydro.com](mailto:wilf.thorburn@athydro.com)

If using e-mail as a point of contact, please ensure that you identify "Privacy" in your subject line.