

## ADMINISTRATIVE POLICIES AND PROCEDURES

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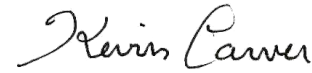
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### Introduction

Welland Hydro-Electric System Corp. ("Welland Hydro") is committed to maintaining the accuracy, confidentiality, security and privacy of customer personal information.

In March 1996, the new Canadian Standards Association *Model Code for the Protection of Personal Information*, CAN/CSA-Q830-96 (the "CSA Code"), was published as a National Standard of Canada. Welland Hydro subscribes to the principles of the CSA Code. This policy has been designed to inform directors, employees, contractors, agents and customers of Welland Hydro's commitment to and recognition of our obligation to meet the spirit and terms of the CSA Code, the Ontario Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). Furthermore, in light of the requirements of MFIPPA and any other applicable provincial legislation (collectively the "Privacy Legislation"), Welland Hydro has created certain documents and procedures, including this Policy, as may be updated from time to time.

This Welland Hydro Privacy Policy is a formal statement of principles and guidelines concerning the requirements for the protection of personal information that we collect, use and disclose with respect to our customers. This Policy not only informs individuals about their rights but also sets out Welland Hydro's privacy operations and goals to implement these rights.

### Glossary of Terms

**Access (Individual Access):** Upon request, an individual shall be informed of the existence, use, and disclosure of his/her personal information and shall be given access to that information. An individual shall have the right to challenge the accuracy and completeness of the information and have it amended as is appropriate.

**Accountability:** An organization is responsible for personal information under its control and shall designate individual(s) who are accountable for the organization's compliance with the Privacy principles and applicable legislation.

**Accuracy:** Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is collected. Personal information shall be updated only when necessary to fulfill the purposes for which it was collected.

**Challenging Compliance:** An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual(s) accountable for the organization's compliance.

**Collection:** the act of gathering, acquiring, recording or obtaining personal information from any source, including third parties, by any means.

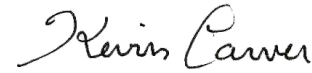
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**Consent:** voluntary agreement of an individual to the collection, use and disclosure of personal information for defined purposes. Consent can be either expressed or implied and can be provided directly by the individual or through an authorized representative of the individual. Expressed consent can be given orally, electronically or in writing but is always unequivocal and does not require any inference on the part of Welland Hydro. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

**Customer:** an individual who uses or applies to use the services of Welland Hydro.

**Customer Personal Information:** means any information, regardless of its form or format (i.e., hard copy, electronic, digital, etc.), that can be used to identify, or to assist in the identification of, an individual who is a customer of Welland Hydro. Customer Personal Information shall remain the property of Welland Hydro at all times.

**Disclosure:** Disclosure occurs when personal information is made available to others outside the organization.

**Identify the purpose:** Purposes, which include why information is being collected and how it will be used, shall be identified by the organization at or before the time of collection. The reason for collecting information should be documented. The individual from whom the information is collected should be informed as to why this information is required.

**Limiting Collection:** The collection of personal information must be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means. The type and amount of information collected should be limited to that which is necessary for the purposes identified. Staff members must be able to explain the reason for collecting information, however questions regarding use can be forwarded to the Privacy Officer.

**Limiting Use, Disclosure, Retention:** Personal information shall not be used or disclosed for purposes other than for which it was collected, except with the consent of the individual or as required by law. Any new use for personal information must be identified. Consent must be obtained from an individual before the information is used for the purpose identified. Personal information shall only be retained as long as is necessary for the fulfillment of the purposes identified. Maximum and minimum retention periods, which take into account any legal requirements or restrictions and redress mechanisms, should be instituted. Information without a specific purpose or that no longer fulfils its intended purpose shall be disposed of in a manner that prevents improper access, such as the shredding of paper files or deletion of electronic records.

Policies outlining the type and frequency of updates to information should be established.

**Openness:** An organization shall make specific information about its policies and practices relating

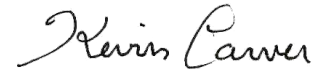
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to the management of personal information readily available to individuals, in a manner that is easy to understand. Customers, clients, and employees shall be informed of these policies.

**Personal Information:** Personal information is any factual or subjective information, recorded or not, regarding an identifiable individual. Examples include name and address, age, identification numbers, income, ethnic origin, blood type, opinions, evaluations, comments, social status, disciplinary actions, employee files, credit or loan records, medical records, or the existence of a dispute between a consumer and a merchant. For a Welland Hydro customer, personal information includes a customer's credit information, billing records, service and equipment, and any recorded complaints.

**Personal Information Bank:** A collection of personal information that is organized and capable of being retrieved using an individual's name or an identifying number or particular assigned to the individual.

**Privacy:** Privacy is the fundamental right of an individual to decide about the processing of his/her personal data as well as to protect his/her intimate sphere. Privacy violations include:

- improper acquisition of personal information, including its access, collection, and distribution;
- improper use of information, including its use for reasons other than for which it was explicitly collected or its transfer to other parties;
- unwanted solicitation of personal data; and
- improper storage of information.

**Retention Period:** A retention period is the duration of time personal information is held. Personal information should not be held for longer than is necessary to fulfill the purpose for which it was collected but must be retained long enough to allow individuals to access it if it has formed the basis of a decision that affects them.

**Safeguards:** Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

**Third party:** an individual other than the customer or his agent, or an organization other than Welland Hydro.

**Use:** the treatment, handling, and management of personal information by Welland Hydro.

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### **Distinctions Between Privacy, Security and Confidentiality**

**Privacy:** relates to people, process and accountability. It gives individuals control over their personal information and allows them to grant permission to an organization for the collection, use, disclosure and retention of that information.

**Security:** is the essential component for preventing the inadvertent release of personal information. Security also relates to the availability and integrity of personal information.

**Confidentiality:** addresses the disclosure of personal information.

### **Privacy Policy Directives**

#### ***Principle 1 - Accountability***

**Welland Hydro is accountable for all personal information in its possession or control and shall designate one or more persons who will be responsible for the companies' compliance with the following principles:**

- 1.1 The President & Chief Executive Officer (CEO) of Welland Hydro has ultimate responsibility for the protection of personal information of customers. The CEO may delegate the day-to-day operational privacy responsibilities to another individual. All staff share responsibility for adhering to the Welland Hydro's privacy policies and procedures.
- 1.2 Welland Hydro has designated a Corporate Privacy Officer to oversee compliance with the Welland Hydro Privacy Policy. Welland Hydro shall provide, upon request, the name and contact information of the Corporate Privacy Officer.
- 1.3 Welland Hydro is responsible for personal information in its possession or control, including any personal information that has been transferred to a third party for processing. Welland Hydro will use contractual or other means to provide a comparable level of protection of personal information while such information is being processed by a third party.
- 1.4 Welland Hydro shall implement policies and procedures to give effect to the Welland Hydro Privacy Policy including:
  - a) implementing procedures to protect personal information and to oversee the company's compliance with MFIPPA;

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- b) establishing procedures to receive and respond to inquiries or complaints with respect to an individual's personal information;
- c) training staff and communicating to staff about the company's privacy policies and practices; and
- d) developing information to explain the organization's policies and procedures.

### ***Principle 2 – Identifying Purposes***

2.1 Identifying the purposes for which personal information is collected at or before the time of collection allows Welland Hydro to determine the information needed to fulfill these purposes.

Welland Hydro collects personal information only for the following purposes:

- a) To establish and maintain responsible commercial relationships with customers and to provide ongoing service;
- b) To meet all legal, regulatory, settlement, and market operations requirements;
- c) To identify or contact customers, respond to customer inquiries and otherwise maintain business relations with customers;
- d) To help prevent or investigate fraud, theft of power or other breaches of the law;
- e) Billing and collection of payments for electric service;
- f) To register customers for pre-authorized payment for services;
- g) Priority restoration of electric service to the correct address and meter, as may be required by medical circumstances;
- h) To provide customers with information about our services, the electricity industry, energy conservation and rates;
- i) To request customer participation in surveys or contests; and
- j) To notify customers about events or causes sponsored by Welland Hydro.

Welland Hydro may:

- a) Monitor and/or record any telephone conversations with its customers for quality assurance and training purposes.
- b) Share information with third-party service providers who perform services on our behalf. These service providers are given only the information necessary to perform those services that we have contracted them to provide and are obliged to meet the same privacy standards as Welland Hydro.

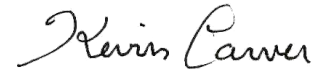
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- 2.2 Welland Hydro shall specify, either orally, in writing or electronically, all identified purposes for the collection, use and disclosure of personal information to the customer at the time such personal information is collected.
- 2.3 Those responsible for collecting personal information should be able to explain to individuals the purposes for which the information is being collected. In certain circumstances, the customer may be referred to a designated person within Welland Hydro who can explain those purposes in greater detail.
- 2.4 Unless required by law, Welland Hydro shall not use or disclose, for any new purpose, personal information that has already been collected without first identifying and documenting the new purpose and obtaining the consent of the customer.
- 2.5 If Welland Hydro identifies other purposes for which any personal information collected may be used, it will seek consent before such use. Customers may refuse permission for Welland Hydro to use their personal information for any new purpose, unless the new purpose is required or permitted by law or regulated authorities.

### ***Principle 3 - Consent***

***The knowledge and consent of a customer are required for the collection, use or disclosure of personal information, except where inappropriate.***

- 3.1 In certain circumstances, personal information may be collected, used or disclosed without the knowledge and consent of the individual. For example, legal or security reasons may make it impossible or impractical to seek consent.

Welland Hydro may collect, use or disclose personal information without an individual's knowledge or consent only in limited circumstances as permitted by law.

Welland Hydro may use or disclose personal information without the individual's knowledge or consent if it is clearly in the individual's best interests to do so and consent cannot be sought in a timely manner. An example of such circumstances is in the case of an emergency where the life, health or security of an individual is threatened.

- 3.2 This principle requires "knowledge and consent" of an individual for the collection, use or disclosure of their personal information. In obtaining consent, Welland Hydro shall use reasonable efforts to ensure that a customer is advised of all the identified purposes for which personal information will be used or disclosed.

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- 3.3 Generally, Welland Hydro shall seek an individual's consent for use and disclosure of personal information before or when it collects, uses or discloses personal information. In certain circumstances, Welland Hydro may seek an individual's consent to use and disclose personal information after it has been collected but before it is used or disclosed for a purpose not previously identified.
- 3.4 Welland Hydro may require customers to consent to the collection, use or disclosure of certain personal information in order to provide the individual with electricity services.
- 3.5 In determining an appropriate form of consent, Welland Hydro shall take into account the sensitivity of the personal information and also the reasonable expectations of its customers with respect to the protection, collection, use and disclosure of their personal information.
- 3.6 A customer may refuse or withdraw consent at any time, subject to legal or contractual restrictions, and reasonable notice. However, refusal to provide such consent or withdrawal of such consent, may prevent Welland Hydro from providing certain services as it requires a minimum amount of personal information to provide electricity distribution services. Customers may contact Welland Hydro for more information regarding the withdrawal of consent and any implications of such withdrawal.
- 3.7 Welland Hydro may obtain customer consent from a third party that has obtained consent directly from the customer to disclose the customers personal information to Welland Hydro.
- 3.8 Due to the structure of the electricity sector in Ontario, it may be necessary to share billing and consumption information with third-party billing and settlement agencies, such as where individuals have signed a separate contract with a retailer. Information may also be shared or disclosed to other agencies or organizations as required or permitted by law or regulatory authorities.
- 3.9 Welland Hydro's billing, settlement and regulatory relationships with third-parties are governed by our license and regulatory codes that are established by the Ontario Energy Board.

### ***Principle 4 - Limiting Collection***

***Welland Hydro shall limit the amount and type of personal information it collects to that which is necessary for the purposes identified by the company. Welland Hydro shall collect personal information using procedures which are fair and lawful.***

- 4.1 Welland Hydro shall collect only the amount and type of information needed for the purposes outlined in the Privacy Policy and Privacy Policy Statement or as otherwise consented by the customer and as authorized or required by applicable law.



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- 4.2 The requirement that personal information be collected through fair and lawful means is intended to prevent Welland Hydro from collecting information by misleading or deceiving individuals about the purposes for which the information is being collected.
- 4.3 Welland Hydro will not collect personal information indiscriminately. Likewise, access to personal information will be restricted to only those employees of Welland Hydro who require access in order to perform their duties and as authorized or required by applicable law.

### ***Principle 5 - Limiting Use, Disclosure and Retention***

***Welland Hydro shall not use or disclose personal information for purposes other than those for which it was collected, unless consent is given by the individual to use or disclose it for another purpose or as required by law. Welland Hydro shall retain personal information only as long as necessary for the identified purposes.***

- 5.1 Welland Hydro will not trade, rent or sell personal information. However, in the course of a business transaction, such as a proposed sale of the Company's business or assets (or a part thereof) or a merger or amalgamation of the company with another company, it may disclose personal information to third parties necessary for the purposes of such transaction(s).
- 5.2 If Welland Hydro uses personal information for a new purpose, it will document this purpose.
- 5.3 With the consent of the customer, Welland Hydro may disclose a customer's personal information to the following:
  - a) an agent retained by Welland Hydro in connection with the collection of the customer's account;
  - b) credit grantors and reporting agencies;
  - c) a person who, in the reasonable judgment of Welland Hydro, is seeking the information as an agent of the customer; and
  - d) any other third party or parties, where the customer has provided consent to such disclosure or disclosure as required by law.
- 5.4 Welland Hydro shall maintain reasonable and systematic controls, schedules and practices for the protection of personal information. Record retention, which shall include minimum and maximum retention periods, and destruction shall apply to personal information. Information that is no longer necessary or relevant for the identified purposes for which it was collected or required by law to be retained shall be destroyed.
- 5.5 Welland Hydro will keep personal information only as long as necessary for the identified purposes.

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- 5.6 Personal information that is no longer required to fulfil the identified purposes will be destroyed, erased or made anonymous. Welland Hydro will develop guidelines and implement procedures to govern the destruction of personal information.
- 5.7 Only those employees of Welland Hydro who require access for business reasons or whose duties reasonably so require, are granted access to personal information about customers.

### **Principle 6 – Accuracy**

***Welland Hydro will keep the Personal information in its possession or control accurate, complete, current and relevant, based on the most recent information provided to Welland Hydro***

- 6.1 Personal information used by Welland Hydro shall be sufficiently accurate, complete, current and relevant to minimize the possibility that inappropriate information may be used to make a decision about a customer.
- 6.2 Welland Hydro shall update personal information about customers upon notification by the individual requesting that their personal information be updated or amended.

### **Principle 7 –Safeguards**

***Welland Hydro shall protect personal information with security safeguards appropriate to the sensitivity of the information.***

- 7.1 Welland Hydro shall protect personal information from loss or theft, unauthorized access, disclosure, copying, use, modification or destruction through appropriate security measures. Welland Hydro shall protect all personal information regardless of the format in which it is held.
- 7.2 The nature of the safeguards will vary depending on the sensitivity of the information, amount, distribution, format and the method of storage of the personal information. Welland Hydro will give the highest level of protection to the most sensitive personal information.
- 7.3 The methods of protection should include:
  - Physical security, such as locked filing cabinets and restricted access to offices;
  - Organizational security, such as security clearances and limiting access on a “need to know” basis; and
  - Technological security, such as, the use of passwords and encryption.

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7.4 Welland Hydro will make all its employees aware of the importance of maintaining the confidentiality of personal information.

### ***Principle 8 - Openness***

***Welland Hydro shall make readily available to customers specific information about its policies and practices relating to the management of personal information.***

- 8.1 Welland Hydro will be open about the policies and practices used to manage personal information. Individuals will have access to information about these policies and procedures. This information will be available in a format that is easy to understand.
- 8.2 Welland Hydro shall make the following information about its privacy policies and practices available:
- the name and address of the Corporate Privacy Officer (or persons) accountable for the Welland Hydro's privacy policies and practices and to whom inquiries or complaints can be forwarded;
  - how to gain access to personal information held by Welland Hydro;
  - a description of the type of personal information held by Welland Hydro including a general account of its use; and
  - a copy of any documents or other information that explains Welland Hydro privacy policies, standards or codes.
- 8.3 Welland Hydro may make information on its privacy policies and practices available in a variety of ways, including information at its place of business, bill inserts, bill messages, email, website or through mailings to customers.

### ***Principle 9 - Individual Access***

***Upon request, an individual shall be informed of the existence, use and/or disclosure of his or her personal information in Welland Hydro's possession and shall be given access to that information.***

***A customer shall be able to challenge the accuracy and completeness of the information and have it amended where necessary.***

***In certain situations, Welland Hydro may not be able to provide access to all the personal information it holds about an individual. However, such exceptions to the access requirement***

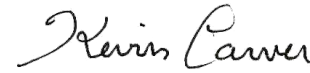
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*are limited and specific. Exceptions may include information that contains references to other individuals and information that cannot be disclosed for legal, security or commercial proprietary reasons.*

*Customers wanting to request access to their personal information, under the access to information legislation (MFIPPA), must complete in full the Access or Correction Request Form and remit a \$5.00 application fee with the completed form. Customers requesting access to original documents must attend Welland Hydro to review.*

- 9.1 Upon request, Welland Hydro shall inform an individual of the personal information that Welland Hydro has in its possession or control about that individual.
- 9.2 Upon request, Welland Hydro shall provide an account of the use and disclosure of such personal information and, where reasonable and possible, shall state the source of the information.
- 9.3 In order to safeguard personal information, a customer may be required to provide sufficient information to properly identify themselves to assure Welland Hydro that they are providing information with respect to the existence, use and disclosure of personal information and authorizing access to an individual's file to the right individual. Any information provided for identification purposes shall only be used for such purpose.
- 9.4 In providing a list of third parties that Welland Hydro has disclosed personal information about a customer to, Welland Hydro will provide as much information as possible to the customer. When it is not possible to provide a list of third parties to which it has disclosed information about an individual, Welland Hydro shall provide a list of third parties to which it may have disclosed information about the individual.
- 9.5 Welland Hydro shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where required, Welland Hydro will disclose or share with third parties who have access to such personal information any amended information and identify the existence of any unresolved differences.

### ***Principle 10 – Challenging Compliance***

***A customer shall be able to challenge Welland Hydro's compliance with the above principles to the designated person or persons accountable for the compliance of the Welland Hydro Privacy Policy.***

- 10.1 Welland Hydro shall maintain procedures for receiving, addressing and responding to all inquiries or complaints from its customers relating to its handling of personal information.

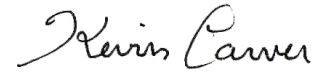
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- 10.2 Welland Hydro shall inform its customers about the existence of these procedures as well as the existence of complaint mechanisms.
- 10.3 The person or persons accountable for compliance with the Welland Hydro Privacy Policy may seek external advice, where appropriate, before providing a final response to individual complaints.
- 10.4 Welland Hydro shall investigate all complaints concerning compliance with the Welland Hydro 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 privacy policies and procedures. A customer shall be informed of the outcome of the investigation regarding his or her complaint in a timely manner.
- 10.5 If individuals are not satisfied with the way Welland Hydro has responded to their complaint, they can contact the:

**Information and Privacy Commissioner, Ontario**  
2 Bloor Street East, Suite 1400  
Toronto, ON M4W 1A8

**Telephone:** 1-800-387-0073 or (416) 326-3333  
**Fax:** (416) 325-9195  
**Website:** [www.ipc.on.ca](http://www.ipc.on.ca)  
**E-mail:** [commissioner@ipc.on.ca](mailto:commissioner@ipc.on.ca)

### **Responsibilities**

***The President & CEO shall:***

- Have the ultimate responsibility for the protection of personal information of customers through the establishment of the Company's privacy policy and compliance of provincial (MFIPPA) legislation.

***The Privacy Officer shall:***

- Administer the Company's privacy policies and practices.
- Receive and manage privacy complaints, inquiries and requests for information under MFIPPA in conjunction with the President & CEO.
- Undertake training of all employees on this policy and its provisions on an annual basis.

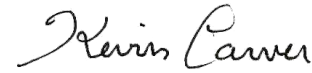
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- Conduct internal random verification checks regarding MFIPPA on an ongoing basis.
- Implement privacy risk assessments every three (3) to five (5) years using an external service provider with expertise in the area of MFIPPA.
- Encourage compliance with the Ten Principles outlined in the CSA Code for the protection of personal information.
- Respond to requests for access to and correction of personal information and general issues concerning personal information as per MFIPPA
- Work with the office of the provincial commissioner during the investigation of any privacy complaint related to MFIPPA against the organization.
- Develop and implement privacy policies and procedures to comply with requirements of MFIPPA.
- Develop and create appropriate consent forms, authorization forms and information notices and materials reflecting current organization and legal practices and privacy requirements under MFIPPA.
- Create and deliver educational training and orientation programs for all employees, volunteers and other appropriate third parties regarding MFIPPA.
- Ensure compliance related to privacy, security and confidentiality of Corporate information as per requirements of MFIPPA, on behalf of the Board.
- Establish and administer a process for receiving, documenting and tracking all complaints concerning personal information as per MFIPPA legislation.
- Maintain current knowledge of provincial privacy legislation and regulations regarding MFIPPA and update the CEO and Board on legislation that may affect the Corporation.
- Receive and respond to all requests for information, as required by MFIPPA, with the approval of the CEO or Board, as applicable.
- Complete and submit reports to the Information and Privacy Commissioner of Ontario as required.

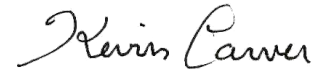
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- Obtain legal assistance and consultant assistance, as required, to address MFIPPA compliance concerns within the approved spending authorization.

***Directors/Supervisors shall:***

- Ensure that the employees under their direction are aware of and abide by this policy and its obligations.

***Employees shall:***

- Understand and adhere to the specified responsibilities outlined in the policy.
- Participate in the Privacy training.

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### **Compliance**

Compliance with the provisions and expectations of this policy is an essential element in Welland Hydro's business success. All employees of Welland Hydro must conduct themselves in accordance with this policy. Failure to do so will result in the individual(s) being subject to appropriate corrective action, which may include, where appropriate, disciplinary action, up to and including termination.

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### WELLAND HYDRO'S PRIVACY POLICY

#### Preface

Welland Hydro-Electric System Corp. ("Welland Hydro") is committed to keeping the personal information of its customers accurate, confidential, secure and private. Our Privacy Policy has been designed to inform customers, employees, and third-party contractors of Welland Hydro's commitment and recognition of our obligation to protect customer personal information in its custody or control and meet the terms of the ***Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)***.

Our Privacy Policy describes the principles by which Welland 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 accessing their personal information. Our Privacy Policy incorporates and expands on the ten principles for the protection of personal information, as established 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. Welland Hydro does, however, protect the confidentiality of such information in accordance with the law and our own policies.

The terms set out in Welland Hydro's Privacy Policy and Policy Statement may change from time to time. Please check our website periodically for any revisions.

#### Ten Principles for the Protection of Personal Information

##### 1. Accountability

Welland 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. Welland Hydro will require a comparable level of protection of this information from its third-party suppliers and contractors.

The President & CEO, in conjunction with the Privacy Officer, has overall responsibility for the protection of personal information and for Welland Hydro's compliance with this Privacy Policy.

##### 2. Identifying Purposes

Personal information that Welland Hydro collects from customers includes:



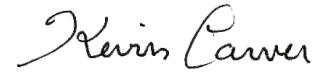
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- the customer's name, address, date of birth, and other contact/occupancy information (as needed);
- the meter number;
- facts about consumption of power, both historic and current;
- information about a customer's transaction with Welland Hydro, such as account numbers, account balances, payment history;
- medical information to be used in case of planned or emergency power outages; and
- bank information for pre-authorized payments.

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

- a) To establish and maintain responsible commercial relationships with customers and to provide ongoing service;
- b) To meet all legal, regulatory, settlement, and market operations requirements;
- c) To identify or contact customers, respond to customer inquiries and otherwise maintain business relations with customers;
- d) To help prevent or investigate fraud, theft of power or other breaches of the law;
- e) Billing and collection of payments for electric service;
- f) To register customers for pre-authorized payment for services;
- g) Priority restoration of electric service to the correct address and meter, as may be required by medical circumstances;
- h) To provide customers with information about our services, the electricity industry, energy conservation and rates;
- i) To request customer participation in surveys or contests; or
- j) To notify customers about events or causes sponsored by Welland Hydro or our affiliates.

**Welland Hydro may:**

- a) Monitor and/or record any telephone conversations with its customers for quality assurance and training purposes.
- b) Share information with third-party service providers who perform services on our behalf. These service providers are given only the information necessary to perform those

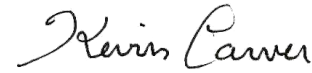
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services that we have contracted them to provide and are obligated to meet the same privacy standards as Welland Hydro.

### 3. Consent

Welland 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. Welland 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. However, refusal to provide such consent or withdrawal of such consent, may prevent the Company from providing some services as it requires a minimum amount of personal information to provide electricity distribution services.

### 4. Limiting Collection

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

Welland Hydro will only use the personal information for the purpose for which it was collected as identified in Principle 2: Identifying Purposes, unless consent is given by the individual to use or disclose it for another purpose. Welland 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, Welland Hydro may have a legal duty or right to disclose personal information without the individual's knowledge or consent.

### 6. Accuracy

Welland Hydro maintains procedures to ensure that all personal information it collects is kept as accurate, complete and up to date as possible.

Individuals may challenge the accuracy and completeness of personal information about them and have it amended, as appropriate.

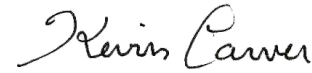
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### 7. Safeguards

In executing its responsibilities with respect to the confidentiality of personal information, Welland 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. These include; 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

Welland Hydro will make its policies and practices relating to the protection of personal information available to its customers. Welland Hydro will keep its customers informed of these policies and practices and customers shall be provided access to all related policies and procedures via separate mailings, bill inserts and bill messages.

### 9. Individual Access

MFIPPA gives customers of Welland Hydro the right to request access to the personal information that Welland 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 formal requests by email, [privacyofficer@wellandhydro.com](mailto:privacyofficer@wellandhydro.com), online, [www.wellandhydro.com/foi-request](http://www.wellandhydro.com/foi-request) or by letter to **950 East Main St., Welland ON L3B 0L9**. Response to an individual’s request will be made within 30 days.

### 10. Challenging Compliance

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

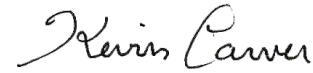
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**Information and Privacy Commissioner, Ontario**  
2 Bloor Street East, Suite 1400,  
Toronto, ON M4W 1A8

**Telephone:** 1-800-387-0073 or (416) 326-3333  
**Fax:** (416) 325-9195  
**Website:** [www.ipc.on.ca](http://www.ipc.on.ca)  
**E-Mail:** [info@ipc.on.ca](mailto:info@ipc.on.ca)

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### FREEDOM OF INFORMATION

Individuals are able to access certain Welland Hydro records without making a formal request under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). Much of our information is routinely available and requests for personal information can generally be made by calling, emailing or writing Welland Hydro. If you feel your records contain errors or omissions, you may informally ask for a correction by contacting Welland Hydro.

Formal requests under MFIPPA should only be used in cases where information is not available through the usual channels. You may contact Welland Hydro's Privacy Officer at 950 East Main St., Welland ON L3B 0L9, 905-732-1381 ext. 233, to determine whether you need to make a formal request.

#### FORMAL REQUESTS UNDER MFIPPA

Individuals wanting to request access to their personal information, make amendments to personal information, and/or request general information pertaining to Welland Hydro-Electric System Corp. ("Welland Hydro"), under the access to information legislation (MFIPPA), must do so by completing, in full, the **Access or Correction Request Form** found on the Welland Hydro website, [www.wellandhydro.com/foi-request](http://www.wellandhydro.com/foi-request). Please note that a \$5.00 application fee must be remitted with the completed form. Completed forms can be mailed or hand delivered to:

**Privacy Officer**  
**Welland Hydro**  
**950 East Main St.**  
**Welland, ON L3B 0L9**

If you are unable to retrieve a copy of the **Access or Correction Request Form** from the Welland Hydro website, please contact the Privacy Officer for a hard copy:

**Telephone: 905-732-1381**  
**E-mail: [privacyofficer@wellandhydro.com](mailto:privacyofficer@wellandhydro.com)**

Copies of the form are also available for pick up at the Welland Hydro office, located at 950 East Main St., Welland, ON.

When completing the **Access or Correction Request Form**, please be sure to describe, in detail, the types of records are seeking and ensure the following is included wherever possible:

- Names of specific files or types of records to which you request access, including specific dates of those records, where possible

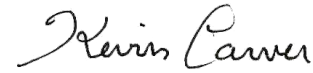
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This detail will help staff conduct a faster search for the requested information and helps keep down any costs for search time, or if necessary, the transfer of your request to a different institution for a response. In addition to the application fee, you may be required to pay other fees. The rules regarding the payment and amount of fees are set out in the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and its regulations <https://www.ontario.ca/laws/regulation/900823>.

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### YOUR PRIVACY AT WELLAND HYDRO

Welland Hydro-Electric System Corp. (“Welland Hydro”) is pleased to be your provider of electricity distribution services. Providing you with a reliable source of electricity requires that Welland Hydro collect and keep certain personal information about you. We are committed to keep accurate and protect the privacy of your personal information. Therefore, we have developed policies and procedures in compliance with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). To access our current privacy policy and learn more about your privacy rights, please visit [www.wellandhydro.com/privacy-policy](http://www.wellandhydro.com/privacy-policy) or call Welland Hydro at 905-732-1381 ext. 233 to request a physical copy of our policy.

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, keep it accurate and secure and your rights with respect to this information.

**Personal information that Welland Hydro collects from customers includes:**

- the customer’s name, address, date of birth, and other contact/occupancy information (as needed);
- the meter number;
- facts about consumption of power, both historic and current;
- information about a customer’s transactions with us, such as account numbers, account balances, payment history;
- medical information to be used in case of planned or emergency power outages; and
- bank information for pre-authorized payments.

**Welland Hydro will collect personal information for the following purposes:**

- a) To establish and maintain responsible commercial relationships with customers and to provide ongoing service;
- b) To meet all legal, regulatory, settlement, and market operations requirements;
- c) To identify or contact customers, respond to customer inquiries and otherwise maintain business relations with customers;
- d) To help prevent or investigate fraud, theft of power or other breaches of the law;
- e) Billing and collection of payments for electric service;
- f) To register customers for pre-authorized payment for services;
- g) Priority restoration of electric service to the correct address and meter, as may be required by medical circumstances;
- h) To provide customers with information about our services, the electricity industry, energy conservation and rates;
- i) To request customer participation in surveys or contests; or

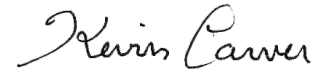
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- j) To notify customers about events or causes sponsored by Welland Hydro.

**Welland Hydro may:**

- a) Monitor and/or record any telephone conversations with its customers for quality assurance and training purposes.
- b) Share information with third-party service providers who perform services on our behalf. These service providers are given only the information necessary to perform those services that we have contracted them to provide.

Welland Hydro will not sell or trade your personal information. Nor will we use or disclose your information for purposes other than those for which it was collected, except with your consent or in accordance with applicable laws.

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. For example, if you have signed a separate contract with a retailer, then we may provide your billing and consumption information to them. Your information may also be shared or disclosed to other agencies or organizations as required by law or regulation. Our billing, settlement and regulatory relationships with third parties are governed by licenses and codes which are established by the Ontario Energy Board.

You have the right to request access to your personal information which we have collected and to request amendments to personal information about you to ensure its accuracy and completeness. To make a formal request for access to personal information we may have collected, disclosed or used about you or to request that your personal information be amended, please complete the [Access or Correction Request Form](#) found on our website at [www.wellandhydro.com/foi-request](http://www.wellandhydro.com/foi-request) and remit a compulsory \$5.00 application fee payment.

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 905-732-1381 ext. 233 if you have concerns about the collection and use of your personal information by Welland Hydro. 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 [privacyofficer@wellandhydro.com](mailto:privacyofficer@wellandhydro.com) or if you write to us at **950 East Main St. Welland ON, L3B 0L9**, our Privacy Officer will respond to any questions or concerns you may have.

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



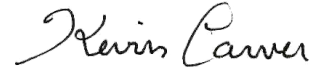
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### RELATED ADMINISTRATIVE PROCEDURES/FORMS:

Procedures/Forms	Document #
Access or Correction Request Form	