



MIDLAND POWER UTILITY CORPORATION

16984 Highway#12 P.O. Box 820

Midland Ontario L4R 4P4

Privacy Policy Statement

Preface

MIDLAND POWER UTILITY CORPORATION 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 customers of MIDLAND POWER UTILITY CORPORATION of our commitment and recognition to our obligation to meet the spirit and terms of the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

Contents

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

Personal Information Protection Principles

1. Accountability

MIDLAND POWER UTILITY CORPORATION 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.

MIDLAND POWER UTILITY CORPORATION will require a comparable level of protection of this information from its third party relations.

Ms. Christine Bell, our Privacy Officer, has overall responsibility for our protection of personal information and for MIDLAND POWER UTILITY CORPORATION's compliance with this Privacy Policy.

2. Identifying Purposes

Personal information that MIDLAND POWER UTILITY CORPORATION collects from customers includes:

- the customer's name and address and other contact information, such as telephone numbers, email address;



- the meter numbers;
- facts about consumption of power and water, both historic and current;
- information about a customer's transactions with us, such as account numbers, account balances, payment history;
- credit and reference information, such as date of birth, employment information, drivers license, 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, MIDLAND POWER UTILITY CORPORATION will make the individual aware of the purposes for which MIDLAND POWER UTILITY CORPORATION is requesting the personal information. If MIDLAND POWER UTILITY CORPORATION identifies other purposes for which the personal information may be used, MIDLAND POWER UTILITY CORPORATION will seek the individual's consent prior to such use. MIDLAND POWER UTILITY CORPORATION will advise that it is the individual's right to refuse permission for MIDLAND POWER UTILITY CORPORATION 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 MIDLAND POWER UTILITY CORPORATION will collect personal information for the following purposes:

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

3. Consent

MIDLAND POWER UTILITY CORPORATION 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. MIDLAND POWER UTILITY CORPORATION 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 MIDLAND POWER UTILITY CORPORATION 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

MIDLAND POWER UTILITY CORPORATION limits the amount and type of personal information it collects to that which is necessary for the business of the utility. Each affiliate of MIDLAND POWER UTILITY CORPORATION (such as The Corporation of the Town of Midland) 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

MIDLAND POWER UTILITY CORPORATION 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. MIDLAND POWER UTILITY CORPORATION 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, MIDLAND POWER UTILITY CORPORATION 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 and water services and the correct billing for such services, 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, MIDLAND POWER UTILITY CORPORATION 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 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

MIDLAND POWER UTILITY CORPORATION will make its policies and practices relating to the protection of personal information available to its customers. MIDLAND POWER



UTILITY CORPORATION will keep its customers informed of these policies and practices and customers shall be provided access to all related policies and procedures via MIDLAND POWER UTILITY CORPORATION's office and bill inserts. The information will be available in a format that is easy to understand.

9. Individual Access

Any customer of MIDLAND POWER UTILITY CORPORATION can have access to the personal information about them that MIDLAND POWER UTILITY CORPORATION 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 **526-9361**, via email midpuc@midlandpuc.on.ca or in writing 16984 Highway #12, P.O. Box 820, Midland, Ontario, L4R 4P4. Response to an individual's request will be made in a timely and efficient manner.

10. Challenging Compliance

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