

# **EPCOR Utilities Inc.**

## **Privacy Policy for Personal Information**

EPCOR Utilities Inc. and its subsidiaries (collectively referred to as “EPCOR”) are committed to ensuring that EPCOR manages Personal Information in a manner that is reasonable, transparent and legal. EPCOR recognizes and respects the importance of protecting Personal Information in its custody or under its control and collecting, using and disclosing it only for purposes that are reasonable.

“Personal Information” is information in EPCOR’s possession about an identifiable individual, such as customers, stakeholders, members of the general public and employees, officers and directors of EPCOR. Personal information includes information such as customer account information and employment records.

In this policy, “employee” means an individual employed by EPCOR and includes an individual who performs a service for, in relation to, or in connection with EPCOR as a partner, director, officer, office-holder, apprentice, volunteer, student or under a contract or an agency relationship with EPCOR.

### **Accountability**

EPCOR is responsible for Personal Information in EPCOR’s custody and control. EPCOR has a designated Privacy Officer who is accountable for establishing policy, investigating potential privacy breaches, breach notification and ensuring EPCOR’s compliance with applicable legislation. The contact information for the Privacy Officer is included in Appendix “A” to this policy and will be updated from time to time as necessary.

The Audit Committee of EPCOR’s Board of Directors is responsible for monitoring compliance with this policy.

When EPCOR engages the services of a third party, EPCOR will be responsible for the third party’s compliance with this policy with respect to those services.

### **Consent to the Collection, Use and Disclosure of Personal Information**

Except where applicable legislation provides otherwise, EPCOR will not collect, use or disclose Personal Information about an individual without that individual’s consent. When obtaining consent, EPCOR will ensure that an individual is informed of the purposes for which Personal Information is being collected and will only use or disclose such Personal Information to reasonably fulfill those purposes

When reasonable and permitted by legislation, consent may not be required for certain collections, uses or disclosures of Personal Information, for example, for certain legal, medical or security reasons.

EPCOR will not, as a condition of supplying a product or service, require an individual to consent to the collection, use or disclosure of Personal Information beyond what is necessary to provide the product or service.

An individual may withdraw or vary consent at any time, subject to legal or contractual restrictions and reasonable notice. Unless the consequences of the withdrawal or variance are obvious, EPCOR will inform the individual of the likely consequences of withdrawing or varying consent.

## **Service Providers outside Canada**

From time to time, EPCOR engages affiliates and service providers located outside Canada, including in the United States of America (“USA”), Europe, India and the Philippines, to help us to provide products and services to you. As a result, in addition to Canada, personal information may be collected, used, processed, stored or disclosed in the USA, Europe, India and the Philippines, for the purposes of providing EPCOR with information technology and data processing services, data retention and storage, communications for outage and emergency situations, and to support our customer service, collections and billing services.

Whenever we utilize an affiliate or engage a service provider located outside Canada, EPCOR communicates, to its affiliate or service provider (as applicable), its commitment to privacy as well as its expectations regarding the confidentiality of personal information and security protocols for handling this information. All of our service providers are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to store and process the personal information with the same standards set out in this policy.

However, the measures we take to protect personal information while processed or handled by affiliates and service providers located in other countries are subject to legal requirements in those countries, including that personal information may potentially be accessible by those countries’ courts, law enforcement, national security authorities and other government authorities in certain circumstances.

In addition, please note that EPCOR uses cloud based solutions and personal information collected may reside in data centers outside of Canada, including in the USA, Europe, India and the Philippines.

If you have any questions about the collection, use, or disclosure of personal information by an affiliate or a service provider outside Canada, you may contact EPCOR’s Privacy Officer for information on EPCOR’s policies and practices.

## **Employee Personal Information**

In this policy, “Employee Personal Information” means Personal Information about an individual who is a potential, current or former Employee of EPCOR and is reasonably required by EPCOR for establishing, managing or terminating an employment or managing a post-employment relationship, but does not include personal information about the individual that is unrelated to that relationship.

When reasonable in the circumstances, EPCOR may collect, use or disclose Employee Personal Information without the consent of the individual only for the purposes of establishing, managing or terminating an employment relationship or managing a post-employment relationship. In the case of a current Employee, EPCOR may collect, use or disclose Employee Personal Information without consent only if EPCOR has first provided the Employee with reasonable notification of the purposes for which the information is to be collected, used or disclosed.

EPCOR may also disclose Employee Personal Information about current or former Employees without consent to a potential or current employer if the disclosure is reasonable for the purpose of assisting that employer to determine eligibility or suitability for a position with a new employer.

## **Retention and Destruction of Personal Information**

EPCOR will only retain Personal Information for as long as it is reasonable to retain such information for business or legal purposes. Once the retention period for records containing Personal Information has expired, EPCOR will destroy or modify those records such that information in the records cannot be linked to an identifiable individual.

## **Protection of Personal Information**

EPCOR will protect Personal Information in its custody or control by making reasonable security arrangements against such risks as unauthorized access, disclosure, collection, use, copying, modification, disposal or destruction.

## **Notification of Loss, Unauthorized Access or Disclosure**

Without unreasonable delay, EPCOR will notify the appropriate authorities and individuals of loss, unauthorized access or disclosure of Personal Information within EPCOR's control if such loss, unauthorized access or disclosure may reasonably be considered to present a real risk of significant harm to an individual.

## **Access to and Correction of Personal Information**

Upon written request by an individual, EPCOR will provide access to the individual's Personal Information and/or details about the use or disclosure of that information. Personal Information will be provided in an understandable form, within a reasonable time period and at a reasonable cost to the individual.

EPCOR may be permitted or required to refuse to provide access to Personal Information in certain circumstances, including if confidential business information would be disclosed, if the information was collected for an investigation, legal proceeding, mediation or arbitration, if disclosure could reveal Personal Information about or threaten the life or security of another individual or if the information would reveal Personal Information about another individual. If access is refused, EPCOR will provide the reasons for denying access to Personal Information and the name of the person who can answer on behalf of EPCOR, the applicant's questions about the refusal.

In addition, upon written request by an individual, EPCOR will correct an error or omission in Personal Information about the individual that is under the control of EPCOR.

## **Seeking Information or Reporting Violations**

Individuals may seek information about this policy, request access to Personal Information or raise concerns about compliance with this Policy by contacting EPCOR's Privacy Officer.

## **Compliance with Law**

This policy is to be read in conjunction with applicable privacy legislation in jurisdictions in which EPCOR operates. Employees must endeavour to ensure that their conduct does not contravene applicable privacy legislation.

## Appendix "A"

Title: EPCOR'S Privacy Officer

Address: 28<sup>th</sup> Floor  
10423 101 Street NW  
Edmonton, Alberta  
T5H 0E8

Privacy Line: 780-412-3304

Fax: 780 441-7118

Email: [privacyofficer@epcor.com](mailto:privacyofficer@epcor.com)