

## **PRIVACY POLICY**

GSUI and its wholly owned subsidiaries, Greater Sudbury Hydro Inc. (GSHI), Greater Sudbury Telecommunications Inc. (GSTI) and Greater Sudbury Hydro Plus Inc. (GSHPI) are committed to safeguarding personal information we collect from our customers and staff. Personal information is fundamental to our day-to-day business operations and as such, we strive to ensure privacy and confidentiality of that information.

Personal information means any information about an identifiable individual including any factual or subjective information, recorded or not, in any form such as:

- Name, address, gender, age, ID numbers, income, racial or ethnic origin, employee files, credit records, medical records, financial records, religion, political affiliation, trade union membership and sexual preferences, and;
- Sensitive personal information identified separately in the Act.

The individual's name need not be attached to the personal information in order for it to qualify as personal information.

Personal information does not include information that is publicly available such as:

- Name, title, business address, or telephone number of an employee of an organization, personal information that appears in telephone or other directories, public registries maintained by governments, public court records or that published in the media e.g. birth and marriage announcements.

Our policy is based on the ten (10) key principles of privacy which form part of the Personal Information Protection and Electronic Documents Act:

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

The following section will explain how we fulfill each of the above noted principles.

### **1. Accountability**

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with established privacy principles.

Every director, officer and staff person of GSUI or its subsidiary companies is responsible for the Personal Information in their possession or under their control including information that may have been transferred to a third party for processing.

We have appointed a member of our management team as Privacy Officer for GSUI and its subsidiaries. The Privacy Officer is responsible for our compliance with this Policy and the principles as outlined.

## **2. Identifying Purpose**

The purpose for which personal information is collected shall be identified by the organization at or before the time the information is collected.

GSUI and its subsidiaries collect Personal Information for the following purposes:

- to establish and maintain sound commercial relations with the persons we serve.
- to understand our customers' needs and to establish their eligibility for the products and services which we provide.
- to manage and expand our business and operations
- to meet legal and regulatory requirements
- to provide you with information

The information we collect will be limited to what is necessary for these purposes and we will only use it for these purposes. Should information that we have collected be used for a purpose other than noted above, we will inform you of that new purpose before we use the information.

## **3. Consent**

The knowledge and informed consent of the individual are required for the collection, use or disclosure of personal information, except where exempted by law.

We will not collect, use or disclose to a third party any Personal Information without your express consent unless we are required or permitted to do so by law or where such information could aid in an emergency where people's lives and/or safety are or maybe at stake.

We may disclose Personal Information to a third party without consent if such information is required for billings, settlements, processing of past due accounts, and for market operation purposes.

We may obtain your consent by way of an application form or an opt-out check-off box where failure to opt-out is presumed to constitute consent. Any person can withdraw consent at any time, subject to legal or contractual restrictions and we will explain the implications of such withdrawal.

## **4. Limiting Collection**

The collection of personal information shall 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 of information we usually collect and maintain in the customer service file may include:

1. Name
2. Mailing and local address
3. E-mail address
4. Telephone number
5. Social Insurance Number
6. Date of Birth
7. Credit History and references
8. Transaction History
9. Driver's License Number

With your consent we may collect Personal Information from you in person, at our office, at City of Greater Sudbury Citizens Service Centers, over the telephone or by corresponding with you by mail or the Internet.

#### **5. Limiting Use, Disclosure, and Retention**

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the informed consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

In those instances where we do provide Personal Information to third parties we will provide only the information that is required in the circumstances. Any third party that will receive such information will be subject to strict confidentiality provisions and will represent that they are aware of and comply with this Policy.

#### **6. Accuracy**

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

GSUI and its subsidiaries will ensure that Personal Information is as accurate, complete and up-to-date as is necessary for the purposes for which it was attained. Reasonable efforts will be made to keep your information accurate based on satisfactory evidence provided by you. Every person providing information is encouraged to review and confirm the accuracy of the information on file. Any inaccuracy will be corrected immediately upon our receipt of appropriate evidence.

#### **7. Safeguards**

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

We will protect Personal Information against loss, theft, unauthorized access, disclosure, copying, use or modification. Our methods of protection include:

- physical measures, such as, locked filing cabinets and restricted access to cabinets and offices;
- organizational security clearances and access limited to a "need to know" basis, and;
- technological measures such as the use of passwords and data encryption.

The Privacy Officer will regularly review our procedures and security measures to ensure that they remain effective, appropriate and adhered to.

## **8. Openness**

An organization shall make readily available specific information about its policies and practices relating to the management of personal information.

The privacy policy will be made available in hard copy to all interested parties at our corporate office at 500 Regent Street, Sudbury, Ontario and on-line at [www.sudburyhydro.com](http://www.sudburyhydro.com).

Once in each calendar year every customer that receives a billing invoice from GSUI or its subsidiaries will receive a written statement which references the Corporation's Privacy Policy and the terms and conditions under which we extend service.

## **9. Individual Access**

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Based on a written request, satisfactory identification and a nominal fee we will provide access to the Personal Information that we retain about you. If we deny your individual request for access to your Personal Information we will advise you in writing within a reasonable timeframe of the reason for refusal.

The circumstances under which we will not be able to provide you with access include but are not limited to:

- where providing access would likely reveal Personal Information about a third party;
- where information cannot be disclosed for legal, security or commercial proprietary reasons, and;
- where the information is subject to solicitor-client or litigation privilege.

You may challenge our decision not to grant access to your Personal Information.

## **10. Challenging Compliance**

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

All challenges concerning compliance with the above noted principles, which make up the Corporation's Privacy Policy, requests for information or access to your Personal information should be directed to:

Privacy Officer  
Greater Sudbury Utilities Inc.  
GSHI, GSHPI, or GSTI  
P.O. Box 250  
500 Regent Street  
Sudbury, ON P3E 4P1

Telephone: (705)675-7536  
Fax: (705)675-0528

**Privacy Information Provider's Choice**

Every person is free to refuse or withdraw their consent to the collection, use or release of their Personal Information at any time by contacting the Privacy Officer. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent. We will record and respect your choice.